

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Six-Month Review)
of Qwest Corporation's Performance) DOCKET NO. UT-033020
Assurance Plan)
)
) PETITION FOR CLARIFICATION
) OF QWEST CORPORATION
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.....)

COMES NOW Qwest Corporation ("Qwest") and requests clarification of the requirements of Order No. 5 ("the Order") in this proceeding with respect to the effectiveness of payment opportunities for standards for EELs which the Order requires to be filed. In support of this request, Qwest shows as follows:

1. The Order requires that Qwest file the changes to Exhibits B and K of the SGAT to reflect the standards and payment opportunities for EELs to which Qwest had agreed in Colorado, within thirty days of the effective date of the Order. According to WAC 480-07-130(1), the filing is due February 17, 2004.

2. Changes in PIDs are effective sixty days after filing. Thus Qwest will begin reporting new standards for EELs April 1, 2004. The standards for EELs which Qwest will file in response to the Order represent new product disaggregations for Washington. Qwest has no process to disaggregate new products for payment and reporting on other than a

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Law Offices of
Douglas N. Owens
1325 Fourth Avenue
Suite 940
Seattle, WA 98101
Tel: (206) 748-0367

calendar month basis. Qwest seeks clarification that it will be required to process payments to CLECs beginning in May, 2004 for service rendered and reported results beginning April 1, 2004 because Qwest currently does not have the capability to prorate or apply payments based on less than one month's reported data. Data are currently gathered and reported on a calendar month basis.

3. The Order did not indicate any intent to change the reporting from a calendar month to any other basis for gathering data. Qwest submits that a reasonable interpretation of the Order is that payments should begin based on the first full month of reported data following the effective date of the change to the QPAP.

CONCLUSION

Based on the foregoing, Qwest asks that the Commission clarify the Order as set forth above.

Respectfully submitted this 26th day of January, 2004

QWEST CORPORATION

LAW OFFICES OF DOUGLAS N. OWENS

Douglas N. Owens (WSBA 641)
Counsel for Qwest Corporation

Lisa A. Anderl (WSBA 13236)
Qwest Corporation
Associate General Counsel
1600 Seventh Ave., Room 3206
Seattle, WA 98191
(206) 345 1574

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Seattle, WA 98101
Tel: (206) 748-0367