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4 BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

5 In the Matter of the Investigation into
6 U S WEST Communications, Inc.'s
7 Compliance with § 271 of the
8 Telecommunications Act of 1996

Docket No. UT-003022

9 In the Matter of U S WEST
10 Communications, Inc.'s Statement of
11 Generally Available Terms Pursuant to
12 Section 252(f) of the Telecommunications
13 Act of 1996

Docket No. UT-003040

14 QWEST'S REQUEST FOR MODIFICATION/
15 CLARIFICATION OF PROCEDURAL
16 SCHEDULE ESTABLISHED IN THE 18TH
17 SUPPLEMENTAL ORDER

18 On September 21, 2001, the Washington Utilities and Transportation Commission
19 ("Commission") entered the 18th Supplemental Order in this matter addressing the process for
20 review of the remaining issues. In accordance with the terms of that order, any changes to the
21 procedural schedule established therein must be requested within 10 days of the mailing of the
22 Order (see, page 6). Qwest is submitting this request today in order to meet that deadline, and
23 recommends that this issue may be discussed further if necessary during the October 17, 2001
24 prehearing conference.

25 Specifically, Qwest requests modification or clarification of the schedule for review of the
26 ROC OSS test results established in paragraph 21 of that order. There, the Commission stated that
27 comments on the OSS testing report should be submitted no later than 7 days after the release of
28 the report. The Commission also states that evidentiary hearings on both the ROC OSS test results
29 and the CICMP process should be held no later than 3 weeks after the release of the testing report.

30 Since the issuance of the 18th Supplemental Order, Qwest and the other parties to the ROC
31 OSS testing process have received additional information regarding the release of the testing
32 report and the process that will take place at the ROC that the Commission should consider in

1 establishing a schedule. Specifically, there will be two final testing reports released – a draft final
2 report, and a final report. Under the schedule now in place at the ROC, all parties (CLECs, states
3 and Qwest) will have 8 business days in which to submit comments regarding the accuracy of any
4 factual statements in the report and suggestions to clarify or correct any errors. KPMG will then
5 release its final report 8 business days after the comments are submitted.

6 Qwest recommends that the Commission modify the existing procedural schedule to allow
7 all parties in Washington the same 8 business days after the release of the draft final report to
8 submit any substantive comments they may have to this Commission. Qwest also recommends
9 and requests that the evidentiary hearings in Washington be held one week after the release of the
10 final report, which would mean that the evidentiary hearings would be a full 4 weeks after the
11 release of the draft final report. Qwest believes that this schedule makes sense because the limited
12 nature and scope of the comments that will be submitted to KPMG after the draft final report
13 indicate that the draft final report will likely not be altered substantively between the draft and
14 final forms, and the Commission here need not delay receipt of comments until the final report.
15 Qwest will be prepared to discuss this proposal in more detail on October 17, 2001.

16 RESPECTFULLY SUBMITTED this 1st day of October, 2001.

17 QWEST

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