

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Second Six-Month
Review of

QWEST CORPORATION'S

Performance Assurance Plan

DOCKET NO. UT-043007

COMMISSION STAFF'S
COMMENTS ON QWEST'S
SGAT FILING

1 On July 13, 2004, the Commission issued Order No. 6 in Docket UT-043007
and in the procedural schedule requested comments on Qwest's SGAT filing
(Docket UT-043029) on July 16, 2004. Staff's comments are set forth below.

2 Qwest's SGAT filing consists of revisions to Exhibits B and K of the SGAT.
With respect to Exhibit K, Qwest has waived the 60 days action requirement in order
to allow parties to address the proposed changes to Exhibit K in the six-month
review. Hence, Staff will not address that at this time.

3 With respect to Exhibit B, Staff's review of the filing shows that Qwest has
modified Exhibit B to add PO-20 (Expanded) – Manual Service Order Accuracy,
which includes a phased-in approach to assessing manual service order accuracy
with benchmark standards applicable to each stage of the phase-in. The phase-in
approach was worked out and agreed to by Qwest and participating CLECs over the

last year and one-half in an ad-hoc forum, and finalized in the LTPA collaborative. Staff compared the changes in Exhibit B with the agreed-upon language from the LTPA and believes that the additions to Exhibit B accurately reflect the language agreed to by the parties in the LTPA. Staff, therefore, recommends that Commission issue an order approving the Exhibit B changes filed in Docket UT-043029.

DATED this 16th day of July, 2004.

CHRISTINE O. GREGOIRE
Attorney General

GREGORY J. TRAUTMAN
Assistant Attorney General
Counsel for Commission Staff
(360) 664-1187