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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Six Month Review of
Qwest Corporation's Performance
Assurance Plan

DOCKET NO. UT-033020

COMMISSION STAFF'S
RESPONSE TO PETITION FOR
CLARIFICATION OF QWEST
CORPORATION

1 On January 27, 2004, the Commission issued a Notice of Opportunity to Respond to Petition for Clarification in Docket UT-033020, the Six Month Review of Qwest's Performance Assurance Plan. Specifically, the Commission seeks a response to Qwest's statement that "Changes in PIDs are effective sixty days after filing," as well as Qwest's proposed dates for reporting and making payments for new standards for enhanced extended loops (EELs).

2 In response to the specific Commission requests, Staff has reviewed both Exhibit B (The ROC 271 Working PID Version 5.0a) and Exhibit K (The Washington QPAP) to the Qwest SGAT and does not find any language regarding the 60-day time frame within which PID changes would be made that Qwest offers in its petition. Hence, Staff does not know where the 60-day effective date originates.

Insofar as it is necessary to change the Washington version of the PID, the work to be accomplished consists of adding the EEL product to the list of products covered under the relevant performance measures. In addition to making that change, Qwest must also implement measurements for each PID based upon the relevant standards applied to each performance measure and it may be that Qwest normally requires 60 days to accomplish such work. However, it appears to Staff that this work has already been performed in the course of implementing the Colorado PUC stipulation, in which Qwest stipulated to provide payments for EELs on certain performance measures. Since this Commission adopted the Colorado measures and standards, Staff does not believe that Qwest needs sixty days before being able to report performance and make payments for the EEL product.

3 The Commission order required Qwest to file to incorporate the standards and payment opportunities for EELs within 30 days of the effective date of the order, which was January 16, 2004. Staff does not dispute Qwest's assertion that it cannot prorate or measure on less than a monthly basis. Therefore, it seems reasonable to Staff to require Qwest to begin measuring EELs for payment purposes

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on March 1, 2004, and to make payments on March performance, if warranted, in May, 2004, with the data being processed and payments prepared during April.

DATED this 29th day of January, 2004.

CHRISTINE O. GREGOIRE
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