

APPENDIX A

Qwest Compliance With Evidentiary Requirements Included in Supplemental Interpretive and Policy Statement

Checklist Item 3: Poles, Ducts, Conduits and Rights of Way

For each section 271 checklist item, U S WEST should provide relevant, detailed information in response to the generic questions below, as well as to the specific questions for each item.

Generic Questions:

Question	Testimony/Evidence Reference
1. Describe how U S WEST has fully implemented this checklist item as required by section 271 of the Act.	Ex. 151-T, at 3-5.
2. What performance standards must U S WEST meet regarding the quality, reliability, and timeliness of providing checklist items to CLEC's, affiliates, and itself? How were these performance standards determined?	Ex. 151-T, at 8-11.
3. To whom is U S WEST presently providing, on a commercial basis, this checklist item?	Ex. 151-T, at 18-20; Ex. C-156.
4. Describe how the quality and reliability of checklist items provided to competitors by U S WEST are comparable to the quality and reliability of such items U S WEST provides to itself or its own customers.	Response to BR #17; Response to BR#19.
5. What technical standards and/or business rules is U S WEST providing to CLECs for each checklist item? Explain the process and scheduling for updating these technical standards and/or business rules.	N/A
6. What is the rate of each checklist item? How was the pricing of each item (as applicable) determined? Is pricing equitable?	Ex. 106.

<p>7. If U S WEST is not currently providing this checklist item, is U S WEST offering the item? If so, how is it offering the item and under what terms, conditions, and rates? Describe how the checklist item is readily available and easily obtained by competitors.</p>	<p>N/A - item is being provided.</p>
<p>8. If U S WEST is not currently offering this checklist item, is U S WEST capable of commercially providing it? What is U S WEST's anticipated schedule to provide the item? Has any CLEC requested the checklist item?</p>	<p>N/A - item is being provided.</p>
<p>9. Has U S WEST received any formal or informal written complaints from new entrants regarding provision of this checklist item? If so, what was the nature of the complaint, what is its current status and, if applicable, how was it resolved? For complaints that were found to be valid, what steps did U S WEST take to avoid recurrences?</p>	<p>Ex. 151-T, at 19; Ex. 157-T, at 9-11.</p>
<p>10. Is U S WEST able to provide this checklist item in all parts of its Washington state service territory? If not, describe in which parts of its territory the service cannot be provided, and why.</p>	<p>Ex. 151-T, at 18.</p>

Questions Specific to Checklist Item 3:

Question	Testimony/Evidence Reference
<p>1. How is U S WEST providing nondiscriminatory access to poles, ducts, conduits and rights-of-way at just and reasonable rates?</p>	<p>Ex. 151-T, at 6, 7; SGAT, Ex. 106, Sec. 10.8.2. There is an impasse issue w/ respect to nondiscriminatory access to rights-of-way.</p>
<p>2. Does U S WEST provide the same access to these facilities to CLECs as it provides itself? Describe how it does so.</p>	<p>Ex. 151-T, at 12-15.</p>

3. Does U S WEST make available to CLECs its maps, plats, and other relevant data, and what are the terms and conditions of such availability? Describe how it does so.	Ex. 151-T, at 15; SGAT, Ex. 106, Sec. 10.8.2.4. There is an impasse issue w/respect to “extensive requests.”
4. Describe any municipal (or other type of government) franchise, grant, or additional requirement that affects U S WEST's access to pathways, poles, conduits, and rights-of-way differently from that of unaffiliated carriers.	Ex. 151-T, at 6-7; SGAT, Ex. 106.
5. What is U S WEST's policy for reservation of space for its own use? How does this affect access to rights-of-way of competitors?	SGAT, Ex. 106, Sec. 10.8.2.
6. How many competitors gain access to customer dwellings in multidwelling units, including access to interbuilding cabling?	Ex. 151-T, at 20.

Checklist Item 7: 911/E911, Directory Assistance, and Operator Services

For each section 271 checklist item, U S WEST should provide relevant, detailed information in response to the generic questions below, as well as to the specific questions for each item.

Generic Questions:

Question	Testimony/Evidence Reference
1. Describe how U S WEST has fully implemented this checklist item as required by section 271 of the Act.	911: Ex. 131-T, at 6; DA: Ex. 111-T, at 5; OS: Ex. 111-T, at 13.
2. What performance standards must U S WEST meet regarding the quality, reliability, and timeliness of providing checklist items to CLEC’s, affiliates, and itself? How were these performance standards determined?	911: Ex. 131-T, at 21, 22; No info on how performance standards were determined. Ex. 131-T, at 7-8, on NENA industry guidelines. DA/OS: Ex. 120; Ex. 121. No info on how standards were determined.
3. To whom is U S WEST presently providing, on a commercial basis, this checklist item?	911: Ex. 131-T, at 6; Ex. C-140; DA: Ex. 111-T, at 7; Ex. 114-T, at 9-10. OS: Ex. 111-T, at 15.

<p>4. Describe how the quality and reliability of checklist items provided to competitors by U S WEST are comparable to the quality and reliability of such items U S WEST provides to itself or its own customers.</p>	<p>911:Ex. 131-T, at 15, 16,18, 19; DA: Ex. 111-T, at 8-11, Ex. 114-T, at 7-8; SGAT, Ex. 106, revised Secs. 10.6.2.1.1, 10.6.2.2, 10.4.2.1.3, 10.5.2.10.; OS; Ex. 111-T, at 18-20.</p>
<p>5. What technical standards and/or business rules is U S WEST providing to CLECs for each checklist item? Explain the process and scheduling for updating these technical standards and/or business rules.</p>	<p>911: Ex. 131-T, at 7. Process, Ex. 132; No info on update scheduling; DA: SGAT, Ex. 106,10.5, 10.6; OS: SGAT, Ex. 106, 10.7. No process or schedule for updating rules.</p>
<p>6. What is the rate of each checklist item? How was the pricing of each item (as applicable) determined? Is pricing equitable?</p>	<p>SGAT, Ex. 106; Matrix of what docket things are being addressed in; pricing deferred to 3013.</p>
<p>7. If U S WEST is not currently providing this checklist item, is U S WEST offering the item? If so, how is it offering the item and under what terms, conditions, and rates? Describe how the checklist item is readily available and easily obtained by competitors.</p>	<p>NA - items are being offered.</p>
<p>8. If U S WEST is not currently offering this checklist item, is U S WEST capable of commercially providing it? What is U S WEST's anticipated schedule to provide the item? Has any CLEC requested the checklist item?</p>	<p>NA - items are being offered.</p>
<p>9. Has U S WEST received any formal or informal written complaints from new entrants regarding provision of this checklist item? If so, what was the nature of the complaint, what is its current status and, if applicable, how was it resolved? For complaints that were found to be valid, what steps did U S WEST take to avoid recurrences?</p>	<p>911: No information provided. DA/OS: Ex. 111-T, at 28 - none known about.</p>

10. Is U S WEST able to provide this checklist item in all parts of its Washington state service territory? If not, describe in which parts of its territory the service cannot be provided, and why.	911: Ex. 131-T, at 9. DA/OS: Ex. 111-T, at 28.
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Questions Specific to Checklist Item 7:

Question	Testimony/Evidence Reference
1. How is U S West providing nondiscriminatory access to 911 and E911 services/ Directory assistance services? Operator call completion services?	911: Ex. 131-T, at 6-20.
2. How is U S WEST trying to resolve any problems it has experienced in integrating CLEC customer information into the 911 system? Discuss what problems, if any, are caused by CLEC error.	911: Ex. 131-T, at 19.
3. Please provide data showing the percentage of errors found in CLEC end user information and U S WEST end user information, respectively, and the frequency of updates to the database for CLEC end user information and U S WEST end user information, respectively.	911: Ex. 131-T, at 21. Data is not available for CLEC end user information and Qwest end user information separately. Reports are due out by second quarter 2000. DA./OS: Ex. 111-T, at 21 and Ex. 112; measures are being implemented (see Checklist Item #8)

Checklist Item 8: White Pages Directory Listings

For each section 271 checklist item, U S WEST should provide relevant, detailed information in response to the generic questions below, as well as to the specific questions for each item.

Generic Questions:

Question	Testimony/Evidence Reference
1. Describe how Qwest has fully implemented this checklist item as required by section 271 of the Act.	Ex. 111-T, at 29 - 35.

<p>2. What performance standards must Qwest meet regarding the quality, reliability, and timeliness of providing checklist items to CLEC's, affiliates, and itself? How were these performance standards determined?</p>	<p>Ex. 111-T, at 36; Ex. 114-T, at 14; and Ex. 120.</p> <p>NOTE: There is no discussion of specifically how the company came to develop these two approaches for the needed standards. The first performance report is due now.</p>
<p>3. To whom is Qwest presently providing, on a commercial basis, this checklist item?</p>	<p>Ex. 111-T, at 31; and Ex. 113-C.</p>
<p>4. Describe how the quality and reliability of checklist items provided to competitors by Qwest are comparable to the quality and reliability for such items Qwest provides to itself or its own customers.</p>	<p>Ex. 111-T, at 32 - 34; and Ex. 112.</p>
<p>5. What technical standards and/or business rules is Qwest providing to CLEC's for each checklist item? Explain the process and scheduling for updating these technical standards and/or business rules.</p>	<p>Ex. 111, at 33 - 36, Qwest Reseller and Facility-based Co-Provider Directory Listings User Documents, Ex. 118</p> <p>NOTE: There is no explanation or schedule provided for the updating of these technical standards and/or business rules.</p>
<p>6. What is the rate of each checklist item? How was the pricing of each item (as applicable) determined? Is pricing equitable?</p>	<p>Ex. 111-T, at 31.</p>
<p>7. If Qwest is not currently providing this checklist item, is Qwest offering the item? If so, how is it offering the item and under what terms, condition, and rates? Describe how the checklist item is readily available and easily obtained by competitors?</p>	<p>N/A - item is being provided</p>
<p>8. If Qwest is not currently offering this checklist item, is Qwest capable of commercially providing it? What is Qwest's anticipated schedule to provide the item? Has any CLEC requested the checklist item?</p>	<p>N/A - item is being provided</p>

<p>9. Has Qwest received any formal or informal written complaints from new entrants regarding provision of this checklist item? If so, what was the nature of the complaint, what is its current status and, if applicable, how was it resolved? For complaints that were found to be valid, what steps did Qwest take to avoid recurrences?</p>	<p>N/A - no known complaints on this item</p>
<p>10. Is Qwest able to provide this checklist item in all parts of its Washington state service territory? If not, describe in which parts of its territory the service cannot be provided, and why.</p>	<p>Ex. 111-T, at 31; Ex. 112; TR 163, lines 20-25.</p>

Questions Specific to Checklist Item 8:

Question	Testimony/Evidence Reference
<p>1. How is Qwest providing white pages directory listings for customers of the CLEC's telephone exchange service?</p>	<p>Ex. 111-T, at 30, 35, 36, and 37; and Ex. 112.</p>
<p>2. Under what terms does Qwest provide white pages directory listings?</p>	<p>Ex. 111-T, at 36; Ex. 112; SGAT, Ex. 106, Section 10.4; Qwest Reseller and Facility-based Co-Provider Directory Listings User Documents, Ex. 118.</p>
<p>3. Under what terms does Qwest provide nondiscriminatory access to basic directory listings for business accounts (name, address, telephone number, and primary business classification)?</p>	<p>SGAT, Ex. 106, Section 10.4, NOTE: There is no specific comment in the SGAT, Section 10.4 about <i>business accounts</i> specifically. The SGAT puts it on the CLEC to ensure all listings are given all the appropriate classifications.</p>
<p>4. Under what terms does Qwest provide: (1) complete content of white page local exchange directory in electronic format; (ii) specific white page directory publication schedules and deadlines; and (iii) specific white page directory publication schedules and delivery dates/locations?</p>	<p>Ex 111-T, at 35, 37; SGAT, Ex 106, section 10.4.2.3; TR 168; Ex 118.</p>

<p>5. Under what terms does Qwest deliver white and yellow page directories to customers of new carriers? How do those terms differ from those Qwest affords itself, its affiliates, or its retail customers? How do those terms differ from the requirements contained in WAC 480-120-042?</p>	<p>Ex 111-T, at 35; SGAT, Ex 106, 10.4.2.12,</p> <p>NOTE: The terms about delivery of white and yellow pages do differ from the WAC. The Washington SGAT is more specific about the terms.</p>
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Checklist Item 9: Nondiscriminatory Access to Telephone Numbers

For each section 271 checklist item, U S WEST should provide relevant, detailed information in response to the generic questions below, as well as to the specific questions for each item.

Generic Questions:

Question	Testimony/Evidence Reference
<p>1. Describe how U S WEST has fully implemented this checklist item as required by section 271 of the Act.</p>	<p>Ex. 131-T, at 25-27.</p>
<p>2. What performance standards must U S WEST meet regarding the quality, reliability, and timeliness of providing checklist items to CLEC's, affiliates, and itself? How were these performance standards determined?</p>	<p>Ex. 131-T, at 25. Guidelines are external (Industry Numbering Committee). No info on how guidelines were determined.</p>
<p>3. To whom is U S WEST presently providing, on a commercial basis, this checklist item?</p>	<p>Number assignment function now performed by third party. Qwest currently provides NXX Code activations. No information provided re: to whom it provides NXX activations.</p>
<p>4. Describe how the quality and reliability of checklist items provided to competitors by U S WEST are comparable to the quality and reliability of such items U S WEST provides to itself or its own customers.</p>	<p>Non-compliant. For NXX code activations, Qwest's performance results indicate that its performance for CLECs is deteriorating, while it is improving for Qwest itself. (See NP-1 NXX Code Activation, Supplemental Response to BR #12)</p>
<p>5. What technical standards and/or business rules is U S WEST providing to CLECs for each checklist item? Explain the process and scheduling for updating these technical standards and/or business rules.</p>	<p>Ex. 131-T, at 26, for NXX activations. Carriers are responsible for accuracy and complete information submitted to LERG.</p>

<p>6. What is the rate of each checklist item? How was the pricing of each item (as applicable) determined? Is pricing equitable?</p>	<p>N/A - service is provided at no charge.</p>
<p>7. If U S WEST is not currently providing this checklist item, is U S WEST offering the item? If so, how is it offering the item and under what terms, conditions, and rates? Describe how the checklist item is readily available and easily obtained by competitors.</p>	<p>N/A - item is being provided.</p>
<p>8. If U S WEST is not currently offering this checklist item, is U S WEST capable of commercially providing it? What is U S WEST's anticipated schedule to provide the item? Has any CLEC requested the checklist item?</p>	<p>N/A - item is being provided.</p>
<p>9. Has U S WEST received any formal or informal written complaints from new entrants regarding provision of this checklist item? If so, what was the nature of the complaint, what is its current status and, if applicable, how was it resolved? For complaints that were found to be valid, what steps did U S WEST take to avoid recurrences?</p>	<p>Issues re local routing numbers and double assignment of numbers have been deferred to Checklist items 1 and 11, respectively.</p>
<p>10. Is U S WEST able to provide this checklist item in all parts of its Washington state service territory? If not, describe in which parts of its territory the service cannot be provided, and why.</p>	<p>Yes.</p>

Questions Specific to Checklist Item 9:

Question	Testimony/Evidence Reference
1. How is U S WEST providing nondiscriminatory access to telephone numbers for assignment to other carriers' telephone exchange service customers?	Ex. 131-T, at 25-27. For NXX code activations, Qwest is not in compliance according to the performance results. For number assignment, question is N/A - Access to phone numbers is administered through a third party.
2. Under what terms do carriers, including U S WEST and its affiliates, obtain access to telephone numbers for assignment?	Ex. 131-T, at 25.
3. How is U S WEST managing limitations in numbering resources (e.g., NXX freezes)?	Ex. 131-T, at 28. Process is managed by a third party.

Checklist Item 10: Databases and Associated Signaling

For each section 271 checklist item, U S WEST should provide relevant, detailed information in response to the generic questions below, as well as to the specific questions for each item.

Generic Questions:

Question	Testimony/Evidence Reference
1. Describe how U S WEST has fully implemented this checklist item as required by section 271 of the Act.	Ex. 106; Ex. 131-T, at 30-42.
2. What performance standards must U S WEST meet regarding the quality, reliability, and timeliness of providing checklist items to CLEC's, affiliates, and itself? How were these performance standards determined?	Ex. 141-T, at 18; Ex. 145; Ex. 146-C.
3. To whom is U S WEST presently providing, on a commercial basis, this checklist item?	Ex. 131-T, at 30, 35, 38-39; Ex. 140-C.

<p>4. Describe how the quality and reliability of checklist items provided to competitors by U S WEST are comparable to the quality and reliability of such items U S WEST provides to itself or its own customers.</p>	<p>Ex. 131-T, at 34-35, 39-41.</p>
<p>5. What technical standards and/or business rules is U S WEST providing to CLECs for each checklist item? Explain the process and scheduling for updating these technical standards and/or business rules.</p>	<p>Ex. 106, Section 21.0; Ex. 131-T at 30-31, 39-40; Ex. 138, Ex. 139; Ex. 149-C; Ex. 150.</p>
<p>6. What is the rate of each checklist item? How was the pricing of each item (as applicable) determined? Is pricing equitable?</p>	<p>Ex. 131-T, at 30.</p>
<p>7. If U S WEST is not currently providing this checklist item, is U S WEST offering the item? If so, how is it offering the item and under what terms, conditions, and rates? Describe how the checklist item is readily available and easily obtained by competitors.</p>	<p>(Currently providing access to some databases and associated signaling - see (3) above.) Ex. 106; Ex. 131-T, at 30, 34-36.</p>
<p>8. If U S WEST is not currently offering this checklist item, is U S WEST capable of commercially providing it? What is U S WEST's anticipated schedule to provide the item? Has any CLEC requested the checklist item?</p>	<p>Qwest offering access through SGAT if not provided in interconnection agreements. Ex. 131-T, at 30-42.</p>
<p>9. Has U S WEST received any formal or informal written complaints from new entrants regarding provision of this checklist item? If so, what was the nature of the complaint, what is its current status and, if applicable, how was it resolved? For complaints that were found to be valid, what steps did U S WEST take to avoid recurrences?</p>	<p>No. <u>See</u> Ex. 131-T, at 41.</p>

10. Is U S WEST able to provide this checklist item in all parts of its Washington state service territory? If not, describe in which parts of its territory the service cannot be provided, and why.	Ex. 131-T, at 30-42.
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Questions Specific to Checklist Item 10:

Question	Testimony/Evidence Reference
1. How is U S WEST providing nondiscriminatory access to databases and associated signaling necessary for call routing and completion?	Ex. 106, at Section 9.13.1.1; Ex. 131-T, at 33-35, 38.
2. To which CLECs is U S WEST providing such access, and under what terms, conditions, and rates?	Ex. 131-T, at 30, 35, 38-39; Ex. 140-C.
3. Are there any databases that competitors have requested access to that U S WEST is unwilling or unable to supply? Identify the databases and state why U S WEST is unable or unwilling to supply access. Identify the competitors involved.	No; Ex. 131-T, at 39.
4. Are there any pending requests for access to databases that U S WEST has not granted or completed? Identify the nature of the request, the competitor involved and the reason(s) why the request has not been granted or completed.	Yes, WorldCom's request for access to entire ICNAM database, rather than on a per dip or query basis. <u>See</u> Ex. 141-T, at 15-16.

Checklist Item 12: Dialing Parity

For each section 271 checklist item, U S WEST should provide relevant, detailed information in response to the generic questions below, as well as to the specific questions for each item.

Generic Questions:

Question	Testimony/Evidence Reference
1. Describe how U S WEST fully implemented this checklist item as required by section 271 of the Act.	Ex. 131-T, at 43 - 46; TR 191 - 192.
2. What performance standards must U S WEST meet regarding the quality, reliability, and timeliness of providing checklist items to CLEC's, affiliates, and itself? How were these performance standards determined?	N/A NOTE: There are no performance standards listed in the testimony.
3. To whom is U S WEST presently providing, on a commercial basis, this checklist item?	Ex. 131-T, at 44.
4. Describe how the quality and reliability of checklist items provided to competitors by U S WEST are comparable to the quality and reliability of such items U S WEST provides to itself or its own customers.	Ex. 131-T, at 44-46.
5. What technical standards and/or business rules is U S WEST providing to CLECs for each checklist item? Explain the process and scheduling for updating these technical standards and/or business rules.	Ex. 131-T, at 44. NOTE: No detail was provided about these technical standards, nor was there any reference to updating them. Also, the document referenced in the footnote has not been included, to my knowledge, in the filed documentation.
6. What is the rate of each checklist item? How was the pricing of each item (as applicable) determined? Is pricing equitable?	Ex. 131-T, at 45.

<p>7. If U S WEST is not currently providing this checklist item, is U S WEST offering the item? If so, how is it offering the item and under what terms, conditions, and rates? Describe how the checklist item is readily available and easily obtained by competitors.</p>	<p>N/A - item is being provided</p>
<p>8. If U S WEST is not currently offering this checklist item, is U S WEST capable of commercially providing it? What is U S WEST's anticipated schedule to provide the item? Haas any CLEC requested the checklist item?</p>	<p>N/A - item is being provided</p>
<p>9. Has U S WEST received any formal or informal written complaints from new entrants regarding provision of this checklist item? If so, what is its current status and, if applicable, how was it resolved? For complaints that were found to be valid, what steps did U S WEST take to avoid recurrences?</p>	<p>Ex. 131-T, at 46.</p>
<p>10. Is U S WEST able to provide this checklist item in all parts of its Washington territory? If not, describe in which parts of its territory the service cannot be provided, and why.</p>	<p>Ex. 131-T, at 44.</p>

Questions Specific to Checklist Item 12:

Question	Testimony/Evidence Reference
<p>1. How is U S WEST providing nondiscriminatory access to such services or information, as is necessary, to allow a requesting carrier to implement dialing parity in accordance with the requirements of section 251 (b)(3)?</p>	<p>Ex. 131-T, at 44; SGAT, Ex. 106, section 14.1.</p>
<p>2. What percentage of U S WEST switches are providing dialing parity to competitors for local calls?</p>	<p>Ex. 131-T, at 44.</p>

3. What percentage of U S WEST switches, serving what percentage of access lines, have been equipped to provide dialing parity for intraLATA toll calls, and in what percentages of switches, serving what percentage of access lines, has that capability been tested?	Ex. 131-T, at 45.
4. Will intraLATA toll dialing parity be implemented in such switches using the “full 2 - PIC” subscription method, and if not, what method will be used?	Ex. 131-T, at 45.
5. Does U S WEST plan to provide dialing parity for intraLATA toll calls before, or only coincident with, its provisioning of in-region interLATA services? Why or why not?	N/A - item is being provided.
6. After receiving section 271 authorization, when a customer calls U S WEST to establish new local exchange service or to switch the location of it existing service, how does U S WEST plan to have its service representatives inform the customer of their long distance provider options in the manner prescribed in Ameritech/Michigan and Bell South/South Carolina Orders (i.e., offering to list the optional providers, using a random order)? Please provide scripts to be used by service representatives to inform customers of their provider options.	Ex. 131-T, at 45. NOTE: No scripts were provided..

Checklist Item 13: Reciprocal Compensation Arrangements

For each section 271 checklist item, U S WEST should provide relevant. detailed information in response to the generic questions below, as well as to the specific questions for each item.

Generic Questions:

Question	Testimony/Evidence Reference
1. Describe how U S WEST has fully implemented this checklist item as required by section 271 of the Act.	Ex. 151-T; Ex. 157-T; Ex. 106.

<p>2. What performance standards must U S WEST meet regarding the quality, reliability, and timeliness of providing checklist items to CLEC's, affiliates, and itself? How were these performance standards determined?</p>	<p>Not addressed in testimony. <i>See</i> Ex. 106, Section 20 (Under Development).</p>
<p>3. To whom is U S WEST presently providing, on a commercial basis, this checklist item?</p>	<p>Ex. 151-T, at 4, 32-33.</p>
<p>4. Describe how the quality and reliability of checklist items provided to competitors by U S WEST are comparable to the quality and reliability of such items U S WEST provides to itself or its own customers.</p>	<p>Not addressed in testimony. <i>See</i> Ex. 106, Section 20 (Under Development).</p>
<p>5. What technical standards and/or business rules is U S WEST providing to CLECs for each checklist item? Explain the process and scheduling for updating these technical standards and/or business rules.</p>	<p>Ex. 106, Section 21; Ex. 151-T, at 31-32, 36; Ex. 154.</p>
<p>6. What is the rate of each checklist item? How was the pricing of each item (as applicable) determined? Is pricing equitable?</p>	<p>Ex. 106, Exhibit A; Ex. 151-T, at 23, 27-31.</p>
<p>7. If U S WEST is not currently providing this checklist item, is U S WEST offering the item? If so, how is it offering the item and under what terms, conditions, and rates? Describe how the checklist item is readily available and easily obtained by competitors.</p>	<p>Providing through interconnection agreements, <i>also see</i> SGAT, Ex. 106.</p>
<p>8. If U S WEST is not currently offering this checklist item, is U S WEST capable of commercially providing it? What is U S WEST's anticipated schedule to provide the item? Has any CLEC requested the checklist item?</p>	<p>Providing through interconnection agreements, <i>also see</i> SGAT, Ex. 106.</p>

<p>9. Has U S WEST received any formal or informal written complaints from new entrants regarding provision of this checklist item? If so, what was the nature of the complaint, what is its current status and, if applicable, how was it resolved? For complaints that were found to be valid, what steps did U S WEST take to avoid recurrences?</p>	<p>Yes. NEXTLINK brought a formal complaint on this checklist item to the Commission concerning payment of reciprocal compensation for ISP traffic. NEXTLINK also raised the issue during the workshops in June and July.</p>
<p>10. Is U S WEST able to provide this checklist item in all parts of its Washington state service territory? If not, describe in which parts of its territory the service cannot be provided, and why.</p>	<p>Ex. 151-T, at 33.</p>

Questions Specific to Checklist Item 13:

Question	Testimony/Evidence Reference
<p>1. How is U S WEST providing reciprocal compensation arrangements in accordance with the requirements of section 252(d)(2)?</p>	<p>Ex. 151-T, at 4-5, 31.</p>
<p>2. Describe arrangements for reciprocal compensation, including bill-and-keep, for local exchange traffic between U S WEST and CLECs and other ILECs?</p>	<p>Qwest does not completely explain for interconnection agreements, but primarily for the SGAT. <i>See</i> Ex. 151-T, at 27 to 31.</p>
<p>3. For carriers with bill-and-keep arrangements, specify whether bill-and-keep is replaced with explicit compensation arrangements when traffic is not in balance. How is traffic balance determined?</p>	<p>Ex. 151-T, at 31.</p>

<p>4. For all carriers with explicit compensation arrangements, specify the type of arrangements and rates (i.e., call termination rates).</p>	<p>Qwest does not completely explain for interconnection agreements, but primarily for the SGAT. <i>See</i> Ex. 151-T, at 27 to 30.</p>
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