

1. THE CONCERNS OF ESCHELON AND MCI ON THEIR FIRST AND SECOND ISSUES ARE MOOT.

Eschelon and MCI request the Commission to reject the proposed changes in Qwest's Notice of Modification that revise Section 7.4 of Exhibit K and Attachment 1 of Exhibit K to reflect the introduction of the expanded PO-20 PID into the QPAP. The parties object that these changes are the subject of dispute in the Second Six Month review proceeding and ask the Commission to reject the changes and require Qwest to refile Exhibit K at the conclusion of that proceeding to reflect the Commission's decisions on the disputed issues. The concerns of these parties are moot because on June 29, 2004, pursuant to discussion with all parties at the prehearing conference in the Second Six Month Review proceeding, Qwest filed a letter consenting to the extension of the sixty day approval period established by 47 U.S.C. §252(f)(3) for those changes, to extend to the conclusion of Docket UT-043007.

2. ESCHELON AND MCI HAVE FAILED TO INDICATE ANY SUBSTANTIVE ISSUE WITH OR INTEREST IN THE PROPOSED CHANGE TO SECTION 14.2 OF EXHIBIT K WHICH WAS MADE AT THE REQUEST OF PUBLIC COUNSEL.

The concluding issue is that Eschelon and MCI have not shown what objection they have to the proposed change to Section 14.2 of Exhibit K, which simply eliminated the requirement to provide a paper copy of the monthly performance report to Public Counsel. Public Counsel, for whose benefit the requirement to provide a paper copy, has requested the elimination of the requirement and wishes to rely on the electronic copy. Eschelon and MCI have no standing to object to the removal of this requirement, and they have stated no reason

for their opposition that would justify the Commission in rejecting the request in the SGAT proceeding. MCI stated informally that it had no objection to this change. Eschelon has not returned a telephone call from counsel for Qwest that sought to understand the basis of Eschelon's opposition to this request. Because MCI has stated it has no opposition to this request and because Eschelon has no standing to oppose the request, the request should be granted.

Respectfully submitted this 23rd day of July, 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

Adam L. Sherr (WSBA 25291)
Qwest Corporation
Senior Attorney
1600 Seventh Ave., Room 3206
Seattle, WA 98191
(206) 398 2507

QWEST CORPORATION'S
REPLY COMMENTS

CERTIFICATE OF SERVICE

Docket No. UT-003022 and UT-003040

I certify that a copy of Reply Comments of Qwest Corporation was deposited in the U.S. Mail on July 23, 2004, to the following parties:

Dennis D. Ahlers** Eschelon Telecom, Inc. <u>730 Second Avenue South, Suite 1200</u> Minneapolis, MN 55402 <u>Phone: (612) 436-6249</u> <u>Fax: (612) 436-6349</u> E-Mail: ddahlers@eschelon.com	Arthur A. Butler Ater Wynne, LLP 601 Union Street, Suite 5450 Seattle, WA 98101-2327 Phone: (206) 623-4711 Fax: (206) 467-8406 E-Mail: aab@aterwynne.com
Robert Cromwell Public Counsel Office of the Attorney General 900 4th Avenue, Suite 2000 Seattle, WA 98164-1012 Phone: (206) 464-6595 Fax: (206) 389-2058 E-Mail: robertc1@atg.wa.gov	Karen S. Frame Senior Counsel Covad Communications Company 7901 Lowry Blvd. Denver, CO 80230 Phone: (720) 208-1069 Fax: (720) 208-3350 E-mail: kframe@covad.com
Brooks Harlow Miller, Nash, Wiener, Hager & Carlsen 4400 Two Union Square 601 Union Street Seattle, WA 98101 <u>Phone: (206) 622-8484</u> <u>Fax: (206) 622-7485</u> E-Mail: harlow@millernash.com	Michael B. Hazzard Kelley Drye & Warren, LLP 1200 Nineteenth Street, N.W. Fifth Floor Washington, DC 20036 Phone: (703) 918-2316 Fax: (703) 918-2450 E-mail: mhazzard@kelleydrye.com
Lauraine Harding Senior Manager McLeodUSA Telecom Services, Inc. 6400 C Street SW P.O. BOX 3177 Cedar Rapids, IA 52405-3177 Phone: (319) 790-6480 Fax: (319) 790-7901	Andrew O. Isar Director – State Affairs Telecommunications Resellers Assoc. 7901 Skansie Avenue, Suite 240 Gig Harbor, WA 98335 Phone: (253) 851-6700 Fax: (253) 851-6474 E-Mail: aisar@harbor-group.com

QWEST CORPORATION'S
REPLY COMMENTS

Page 4

Law Offices of
Douglas N. Owens
P.O. Box 25416
Seattle, WA 98101
Tel: (206) 748-0367

<p>Gregory J. Kopta** Davis Wright Tremaine 2600 Century Square, 25th Floor 1501 Fourth Avenue Seattle, WA 98101-1688 Phone: (206) 622-3150 Fax: (206) 628-7699 E-Mail: gregkopta@dwt.com</p>	<p>Michel Singer-Nelson** MCI WorldCom Inc. Law and Public Policy 707 17th Street, Suite 4200 Denver, CO 80202 Phone: (303) 390-6106 Fax: (303) 390-6333 E-Mail: michel.singer_nelson@mci.com</p>
<p>Mary B. Tribby AT&T 1875 Lawrence Street Suite 1575 Denver, CO 80202 Phone: (303) 298-6508 Fax: (303) 298-6301 E-Mail: mbtribby@att.com</p>	<p>Barbara Young Sprint 902 Wasco Street, MS: ORHDRA0412 Hood River, OR 97031 Phone: (541) 387-9850 Fax: (541) 387-9753 E-Mail: barbara.c.young@mail.sprint.com</p>

** Denotes signed protective agreement

Dated this 23rd day of July, 2004.

Douglas N. Owens