

**MATRIX RE TRACK A ISSUES
PURSUANT TO SECTION 271(c)(2)(A)**

QUESTION	TESTIMONY AND/OR EXHIBIT REFERENCE
<p>1. How many interconnection agreements has Qwest negotiated or had arbitrated with CLECs pursuant to Sections 251 and 252 of the Act? List the companies and the effective date of each agreement, and whether or not the agreement was negotiated or arbitrated. Provide copies of the agreements.</p>	<p>Exhibit DLT-1T, Page 11, line 17 to page 12, line 5</p> <p>See also the Washington Utilities and Transportation Commission List of Interconnection Agreements dated 12/12/01 attached hereto. This document identifies the date of Commission approval (i.e. the effective date) and if the agreement was negotiated or arbitrated.</p> <p>Further, the Commission has copies of all Interconnection Agreements within their files for the docket numbers provided in the List of Interconnection Agreements.</p>
<p>2. For all arbitrated agreements in #1 above, indicate whether Qwest has appealed the Commission's decision to Federal District Court. Explain the issues in the appeal and its status.</p>	<p>UT-960310, UT-960310, UT-960323, UT-960326 and UT-960347 were appealed to U.S. District Court. The issues included pricing, terms, and conditions. All of these matters have been resolved.</p>
<p>3. Which CLECs have requested negotiations with Qwest pursuant to sections 251 and 252, but have not yet entered into interconnection agreements with the company? What is the status of negotiations and/or arbitrations that have not yet resulted in an approved agreement? What are the unresolved issues in each of those negotiations and arbitrations?</p>	<p>See Confidential Attachment A and Confidential Attachment B.</p>
<p>4. How many interconnection agreements has Qwest negotiated with CLECs pursuant to state WUTC rules which have not been superseded by section 251/252 agreements? List the companies and give the effective date of each agreements.</p>	<p>None.</p>

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5. What services are CLECs currently purchasing under their interconnection agreements? Show in tabular format, by carrier.	Exhibit DLT-2C
6. Which of Qwest's interconnection agreements contain implementation schedules (indicate percentage of total)? What degree of detail do the implementation schedules contain? Provide implementation schedule details for the five largest (number of lines served) CLECs.	When this question was originally posed to U S WEST, separate implementation schedules were often a part of interconnection agreements. Currently, of the active interconnection agreements, the percentage of them that have a separate implementation schedule is approximately 28%. The detail with the implementation schedule varies quite a bit. Please refer to Attachments C, D, E, F, and G for non-confidential interconnection agreements for the requested detail.
7. For those interconnection agreements with implementation schedules, has Qwest met the commitments specified? Have CLECs met their commitments? Give specific citations to the interconnection agreement and explain which party was responsible for not meeting each commitment.	Yes. Yes. Not applicable.
8. Does Qwest believe that any of the CLECs, with whom agreements could qualify U S WEST under Track A, negotiated in bad faith? If so, describe.	No.
9. For those interconnection agreements with implementation schedules, does Qwest believe that any of its competitors are engaging in strategic manipulation of local market entry – or have intentionally delayed implementation of their interconnection agreements – in order to prevent Qwest from entering the in-region, interLATA market? If so, state the basis for such belief.	No. CLEC entry strategies are outside of Qwest's control. Qwest has no responsive evidence at this time.
10. For each interconnection agreement with a CLEC currently providing service, provide traffic data for all traffic terminated to that CLEC on both a resale and facilities basis. For traffic terminated on a facilities basis distinguish between local and intraLATA toll traffic. All reports should include the three most current months.	Please refer to Confidential Attachment H for the requested detail.