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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION



October 20, 2003

Via Overnight Mail

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket No. UT-031626
Comcast Petition for Declaratory Order re Reporting Requirements

Dear Ms. Washburn:

Qwest hereby responds to the Commission's Notice and Opportunity to Submit Statement regarding the petition filed in this docket by Comcast. Qwest believes that it is a necessary party to this proceeding, and states that it does not object to the determination of this matter by a declaratory order. Qwest's interest in this case is that it competes with Comcast for local telephone service. As such, any determination by this Commission as to the applicability of service quality rules to some companies but not all has an impact on the competitive market, and potentially disadvantages Qwest vis-à-vis those companies who do not have to comply with certain rules. Qwest believes that ideally, competitive markets drive service. However, in the event that the Commission regulates service, it should be for all providers. Imposing disparate standards on providers does not serve customers or the competitive market. Thus, all providers should be regulated in the same manner as to service quality—either subject to the rules or not subject to the rules. If the matter is set for further process, Qwest will participate in hearings or by filing written comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa A. Anderl', written in a cursive style.

Lisa A. Anderl

LAA/llw