

QWEST CORPORATION

STATE: Washington  
DOCKET NO: Docket No. UT-003022  
CASE DESCRIPTION: In the Matter of the Investigation into U S WEST's  
Compliance with Section 271  
INTERVENOR: Washington Utilities and Transportation Commission  
REQUEST NO: WUTC INF-04-042

REQUEST:

In response to Bench Request No. 38, Qwest provided an Excel File titled WA BENCH.XLS which contains formulae and definitions for terms used in the formulae. The worksheet titled "Definitions" contains the following definition: "Parity Value - The result at which the CLEC and Qwest are exactly at parity, Used to calculate misses." Sections 6 and 8 of the QPAP concerning calculation of Tier I Payments to CLECs and Monthly Tier I Payments to CLECs, make no reference to the use of parity values for calculating misses. Please explain why there is a difference between the QPAP and the bench request response regarding the calculation of misses and provide corrections as necessary.

RESPONSE:

There is no difference between the worksheet calculations provided in response to Bench Request No. 38 and QPAP Sections 6 and 8. Even though the QPAP may not use the exact phrase "parity value", the concept is used in all parity payment calculations. The relevant QPAP sections referring to "parity values" are shown below (emphasis added to statistical parity references).

6.1.1 The critical z-values are the statistical standard that determines for each CLEC performance measurement whether Qwest has met parity.

8.2.1 Performance Measurements that are Averages or Means:

8.2.1.1 Step 1: For each performance measurement, the average or the mean that would yield the critical z-value shall be calculated. The same denominator as the one used in calculating the z-statistic for the measurement shall be used. (For benchmark measurements, the benchmark value shall be used.)

8.2.1.2 Step 2: The percent difference between actual averages and the calculated average should be calculated. The calculation is % diff = (CLEC result - Calculated Value)/Calculated Value. The percent difference shall be capped at a maximum of 100%. In all calculations of percent differences in sections 8.0 and 9.0, the calculated percent differences is capped at 100%.

8.2.2 Performance Measurements that are Percentages

8.2.2.1 Step 1: For each performance measurement, the percentage that would yield the critical z-value shall be calculated. The same denominator as the one used in calculating the z-statistic for the measurement shall be used. (For benchmark measurements, the benchmark value shall be used.)

8.2.1.2 Step 2: The percent difference between actual averages and the calculated average should be determined.

### 8.2.3 Performance Measurements that are Ratios or Proportions

8.2.3.1 Step 1: For each performance measurement, the ratio that would yield the critical z-value shall be calculated. The same denominator as the one used in calculating the z-statistic for the measurement shall be used. (For benchmark measurements, the benchmark value shall be used.)

8.2.1.2 Step 2: The absolute difference between actual rate for the CLEC and the calculated rate should be determined.

Similar language is found in QPAP Section 9.0 relating to Tier 2 payment calculations.

Respondent: Dennis Wu