

February 28, 2003

Qwest's Response to WorldCom's Proposal Re Time and Motion Studies

In accordance with the timeline established by the Commission, Qwest hereby responds to WorldCom's request to participate in the Time and Motion Study process.

- A. WorldCom requested that it be provided with a copy of the "Time and Motion Study Workplan". WorldCom also provided a list of items it believes should be included in the workplan. Qwest has not yet developed a workplan or designed the time and motion study. Thus, Qwest cannot commit to any specific contents or particular documentation that will be associated with the study. However, Qwest is willing to provide WorldCom with study documentation when it becomes available, and in advance of the observations of the nonrecurring activities.
- B. WorldCom stated that after it receives a copy of the workplan, it could better identify the steps/exercises it would like to observe. In the meantime, WorldCom believes it could limit its observation to the following:
- Observation of the process whereby ILEC Time and Motion study managers convey to actual observation personnel the process by which the Time and Motion Study will be undertaken
 - 3-5 individual observation events, including 2-3 WorldCom representatives observing actual measurement activities, and
 - Observation of the assimilation and compilation process whereby the raw data from Time and Motion Study observations are compiled into activity time estimates (from multiple activities) for purposes of estimating actual NRC charges.

Qwest is willing to agree to allow observation in the first two areas requested, as described and limited by WorldCom. Qwest will be able to advise WorldCom of the opportunity to observe actual measurement activities, but is unable, given the scope of the study required, to engage in any special scheduling for WorldCom of observation events. Finally, Qwest will not allow WorldCom to participate in or observe the process of assimilating and compiling the raw data. This activity is an internal Qwest work activity in anticipation of the preparation of cost studies and testimony for the hearing. Observation of this aspect of the study could therefore intrude on privileged matters, and would be disruptive to the process. Qwest therefore believes that the nature of this activity does not lend itself to observation by a third party.