

[Service Date July 19, 2002]

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

In the Matter of the)	
)	DOCKET NO. UT-003013
)	
Continued Costing and Pricing)	
Proceeding for Interconnection,)	THIRTY-FOURTH
Unbundled Network Elements, Transport)	SUPPLEMENTAL
and Termination, and Resale)	ORDER; APPROVING
)	COMPLIANCE TARIFF FILINGS;
)	REQUIRING ADDITIONAL
.....)	COMPLIANCE FILINGS

BACKGROUND

- 1 On June 21, 2002, the Commission entered its Thirty-Second Supplemental Order (“Part B Order”) and resolved issues relating to certain compliance filings. The Part B Order, paragraph 455, required Qwest Corporation (“Qwest”) to submit certain compliance filings by July 3, 2002.
- 2 Qwest, on June 28, 2002, filed Advice No. 3330T containing tariff revisions for its Tariff No. WN U-42, and represented that the tariffs are in compliance with paragraphs 160, 171, 174, and 147 of the Thirty-Second Supplemental Order. These include the following pages:

INTERCONNECTION SERVICES
WN U-42

<u>SECTION</u>	<u>SHEET</u>	<u>REVISION</u>
3	14.1	1 st
3	14.2	1 st
3	14.3	1 st
3	14.4	Original
3	14.5	Original
3	29	1 st

3 Commission Staff has reviewed Qwest's compliance tariff filing and states that it appears to comply in all substantive respects with the Commission's Order, except that the company did not file sub-loop rates based on paragraph 237 of the Part B Order. Paragraph 237 states that "Qwest must utilize the feeder and distribution ratios proposed by Staff, at Table 1 of Exhibit T-1350, when calculating sub-loop rates." No other party filed comments within the permitted time.

4 Qwest's compliance filing Advice No. 3330T states an effective date of July 28, 2002.

5 The Commission finds that the tariff revisions stated in Advice No. 3330T filed with the Commission by Qwest on June 28, 2002, are consistent with the Commission's Part B Order and therefore concludes that the substance of the tariff revisions should be approved as filed for effect on July 28, 2002.

6 However, Qwest fails to make a compliance filing that is consistent with paragraph 237 of the Part B Order. Further, we note that Qwest has not requested reconsideration of the requirements of paragraph 237. Qwest must make an additional compliance filing applying the feeder and distribution ratios proposed by Staff, at Table 1 of Exhibit T-1350, to Qwest's zone rates approved in Docket No. UT-020724. Qwest may state objections as part of its filing, but if it does so the company must also provide further explanation:

(a) Staff's July 3, 2002 submission states: "In discussing this matter with the company, Qwest's position is that the revised loop and sub-loop rates approved by the Commission on June 26, 2002 in Docket UT-020724 are based on benchmarking to Colorado loop rates and it would be inappropriate to mix the Washington sub-loop ratios with the benchmarked rates." If Staff's representation is not correct, then Qwest should explain its position on applying Washington sub-loop ratios to the benchmarked rates. If Staff's representation is correct, Qwest should explain why it would be inappropriate to mix the Washington sub-loop ratios with the benchmarked rates.

(b) Staff's July 3, 2002 submission states: "The revised loop rates in Docket No. UT-020724 will become effective July 10, 2002. Staff notes however, that the revised sub-loop rates in Docket UT-020724 do not contain any sub-loop rates for the feeder portion of the loop." Qwest should explain why its revised loop rates in Docket No. UT-020724 do not contain any sub-loop rates for the feeder portion of the loop.

(c) Qwest should describe the process used to establish the two-wire loop rates proposed by Qwest in Docket No. UT-020724, including a copy of the work papers associated with the development of the proposed rates.

7 Qwest must make its additional compliance filing regarding feeder and distribution sub-loop rates no later than July 26, 2002. Other parties may file comments to Qwest's additional compliance filing no later than August 1, 2002.

ORDER

THE COMMISSION ORDERS That:

- 8 (1) The tariff revisions in Advice No. 3330T filed by Qwest on June 28, 2002, in accordance with the Thirty-Second Supplemental Order in this proceeding, shall become effective as filed on July 28, 2002.
- 9 (2) Qwest must make an additional compliance filing applying the feeder and distribution ratios proposed by Staff, at Table 1 of Exhibit T-1350, to Qwest's zone rates approved in Docket No. UT-020724 no later than July 26, 2002. Other parties may file comments to Qwest's additional compliance filing no later than August 1, 2002.
- 10 (3) THE COMMISSION ORDERS FURTHER That it retains jurisdiction over the subject matter and the Parties to effectuate the provisions of this and prior orders in these proceedings.

DATED at Olympia, Washington, and effective this day of July, 2002.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MARILYN SHOWALTER, Chairwoman

RICHARD HEMSTAD, Commissioner