

**QWEST'S RESPONSE TO REQUEST FOR COMMENTS ON PROCESS
FOR COMMISSION'S SIX-MONTH REVIEW OF QWEST'S
PERFORMANCE ASSURANCE PLAN (QPAP)
(May 30, 2003)**

RE: In the Matter of the Six-Month Review of Qwest Corporation's Performance Assurance Plan, Docket No. UT-033020.

1. The Long Term PID Administration (LTPA) governing documents have recently been finalized, and the LTPA process will soon begin. The LTPA process will not address all issues identified for the six-month review in Section 16.1 of the QPAP. If Washington State participates in the LTPA process, when should the Commission begin its six-month review process? Should we begin our proceeding in late June, or wait for the LTPA process before beginning proceedings in Washington State?

Based upon comments from participants in the Colorado Commission's six-month review meetings, it appears that Qwest and the participating CLECs believe that changes or modifications to performance measurements should be first addressed through LTPA. The LTPA is in the process of reviewing measurements such as PO-20, Order Accuracy and OP-5, New Service Installation Quality, and that process has resulted in substantial progress toward defining issues of agreement and dispute. It would be useful and efficient to allow the LTPA review of performance measurements to conclude before beginning a six-month review process.

2. What specific issues do you believe the Commission should consider in its six-month review of the QPAP? For example, are there particular performance measures or sections of the QPAP that should be addressed?

Qwest believes that Qwest and/or the CLEC participants will ask the Commission to consider adding new performance measurements vetted through LTPA, such as PO-20. However, what will be agreed to and what will be disputed is still unknown. If agreement is reached, the only issues for the Commission to address at the six month review will be the classification and/or weighting of those measurements in the PAP. Qwest also anticipates asking the Commission to consider whether PO-2 was appropriately incorporated into the Washington QPAP.

3. What type of process should the Commission establish to consider proposals from parties during the six-month review, *i.e.*, a paper record, workshop process, or formal hearing?

Qwest suggests that the Commission consider written comments followed by a hearing, if there are any disputed issues.

4. If you prefer a workshop or formal hearing process, how many days of hearing would you require to present your position or discuss the issues? Would you prefer that the Commissioners be present at the hearing or workshop, or should an administrative law judge preside without the Commissioners?

Qwest does not believe that it is currently in a position to answer this question. The answer will depend on the number and type of issues disputed.

5. If you prefer a workshop process or hearing led only by an administrative law judge, should the Commission schedule a time for presenting issues to the Commissioners for review?

Qwest believes that the Commission should ultimately hear these issues.

6. Do you anticipate sponsoring a witness to testify during the six-month review process, or do you plan to submit only written comments? If you anticipate sponsoring a witness, do you plan to submit pre-filed testimony, or have the witness present direct testimony on the record?

Qwest anticipates submitting a witness on disputed issues and supports the requirement that all testifying witnesses provide pre-filed testimony.

7. Should parties file comments or briefs prior to the proceeding or at the conclusion of the proceeding?

Qwest supports comments, followed by pre-filed testimony on disputed issues, followed by post-hearing briefs.

8. Should the Commission set a deadline for concluding the proceeding? Should the Commission establish an expedited schedule for the six-month review proceeding or allow the proceeding to progress at its own pace?

Qwest does not believe that an expedited process is necessary, but for the sake of efficiency, supports a schedule that includes a time in which any hearing on the matter will be concluded.

Your comments and responses to these questions will assist the Commission in developing and scheduling the six-month review proceeding in Washington. Soon after the Commission receives comments in response to this notice, the Commission will schedule a prehearing conference to determine the process and schedule for the six-month review proceeding.

If you have questions concerning this matter, please contact me at (360) 664-1144 or via e-mail at arendahl@wutc.wa.gov.

Sincerely,

ANN E. RENDAHL
Administrative Law Judge