

**BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation Into )  
U S WEST Communications, Inc.'s ) Docket No. UT-003022  
Compliance With Section 271 of the )  
Telecommunications Act of 1996 )  
\_\_\_\_\_ )

In the Matter of U S WEST Communications, ) Docket No. UT-003040  
Inc.'s Statement of Generally Available )  
Terms Pursuant to Section 252(f) of the )  
Telecommunications Act of 1996 )  
\_\_\_\_\_ )

**AT&T'S REPLY TO QWEST'S RESPONSE TO  
AT&T'S STATEMENT OF SUPPLEMENTAL AUTHORITY  
REGARDING QPAP**

On February 21, 2002, Qwest Corporation filed its "Response of Qwest Corporation to AT&T's Statement of Supplemental Authority" along with a copy of a letter from R. Steven Davis of Qwest Corporation to the Wyoming Public Service Commission ("Wyoming Commission"). In its response and accompanying letter, Qwest indicated that it would be filing a Petition for Reconsideration because the Wyoming Commission's Order "represents an unprecedented and wide-scale departure from the FCC's Section 271 precedents."

On February 28, 2002, Qwest filed its "Petition for Reconsideration of the Commission's QPAP Recommendation" with the Wyoming Public Service Commission arguing that the Wyoming Public Service Commission failed "to take a hard look at the salient problems" and, as such, the Wyoming Commission's decision "lacked the

hallmarks of rational decision making.”<sup>1</sup> On March 14, 2002, the Wyoming Public Service Commission held hearings related to Qwest’s Motion. In such hearing, Qwest was again provided extensive opportunity on the record to argue its position. On March 18, 2002, the Wyoming Public Service Commission denied Qwest’s Petition for Reconsideration, *in toto*, in a three to zero vote utilizing strong FCC mandates in its written decision.<sup>2</sup> Accordingly, the Wyoming Commission’s Order is final.

Respectfully submitted on April 1, 2002.

AT&T COMMUNICATIONS OF THE  
PACIFIC NORTHWEST, INC. AND  
AT&T LOCAL SERVICES ON BEHALF  
OF TCG SEATTLE AND  
TCG OREGON

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<sup>1</sup> *Qwest Corporation Petition for Reconsideration of the Commission’s QPAP Order* at p.4.

<sup>2</sup> *See* Exhibit A attached.