

December 6, 2002

Advice No. 3364T

Carole Washburn, Executive Secretary  
Washington Utilities and  
Transportation Commission  
P.O. Box 47250  
Olympia, Washington 98504-7250

Dear Ms. Washburn:

Qwest Corporation (Qwest) is forwarding for filing the sheets listed on Attachment A.

On June 21, 2002, the Commission entered its Thirty-Second Supplemental Order in Docket No. UT-003013, Part B, a final order determining costs and prices for various UNEs and wholesale services. Qwest filed compliance tariffs on June 28, 2002 under Advice Nos. 3329T and 3330T. Those tariffs were approved by the Commission in the Thirty-Third and Thirty-Fourth Supplemental Orders on July 19, 2002.

On September 23, 2002, the Commission entered the Thirty-Eighth Supplemental Order on Reconsideration. On October 7, 2002, the Commission entered its Fortieth Supplemental Order in this proceeding, affirming and clarifying the Thirty-Eighth Supplemental Order. The Thirty-Eighth and Fortieth Supplemental Orders required Qwest to submit separate nonrecurring costs and charges for CLEC service orders processed manually and for CLEC service orders processed electronically. Pursuant to paragraphs 21 and 22 of the Fortieth Supplemental Order, that compliance filing was due on November 7, 2002. The Commission subsequently extended that date to December 6, 2002 at the request of Qwest.

In accordance with the requirements of the Commission orders noted above, Qwest is making this compliance tariff filing. In addition, Qwest is filing cost studies supporting the compliance filings and explanations of the changes made to the nonrecurring rate elements. There is a separate cost study and description of the modifications to the study for both the rate elements from this Docket No. UT-003013 and for the rate elements previously developed and approved in Docket Nos. UT-960369 et al.

As more fully detailed in the descriptions of the modifications to the cost studies, some nonrecurring rates have not been changed. In general, nonrecurring rates that were not modified are those nonrecurring rates that do not reflect any service order processing activity. For example, the nonrecurring charges for cable unloading reflect the technician's time to actually do the necessary work, but do not include any service order processing time. Thus, that rate cannot be separated between manual and mechanized order processing. Similarly, many of the nonrecurring charges associated with collocation are charges that allow Qwest to recover nonrecurring labor expense (e.g., the site visit nonrecurring charge) or nonrecurring capital

investment (e.g. the cable racking nonrecurring investment) and do not include any service order processing time. Thus, those charges cannot be separated.

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Finally, there is one other nonrecurring charge that Qwest did not separate. That charge is the nonrecurring charge for the loop coordinated installation without cooperative testing. Qwest did not separate this element because there has not previously been a cost study filed to support that rate, and it is necessary to review the cost study to determine the proper amount of time to assign for manual and mechanized processing. It appears as though the rate was introduced in Qwest's benchmarking filings in June 2002 for the purpose of having a full array of installation options available to the CLECs. Qwest is currently reviewing that element and will advise the Commission if it is able to determine a reasonable way in which to separate the charge.

To accommodate room for the bifurcated nonrecurring elements, the USOC column has been deleted from the tariff pages.

Copies of this filing have been provided to the UT-003013 Service List.

If you have questions concerning this filing, please contact Sue Henson on (206) 345-4341.

Yours very truly,

By \_\_\_\_\_  
Vice President

Attachments

**INTERCONNECTION SERVICES**  
**WN U-42**

| <b><u>SECTION</u></b> | <b><u>SHEET</u></b> | <b><u>REVISION</u></b> |
|-----------------------|---------------------|------------------------|
| 3                     | 1                   | 1 <sup>st</sup>        |
| 3                     | 2                   | 1 <sup>st</sup>        |
| 3                     | 4                   | 1 <sup>st</sup>        |
| 3                     | 5                   | 1 <sup>st</sup>        |
| 3                     | 8                   | 5 <sup>th</sup>        |
| 3                     | 8.1                 | 2 <sup>nd</sup>        |
| 3                     | 9                   | 4 <sup>th</sup>        |
| 3                     | 9.1                 | 2 <sup>nd</sup>        |
| 3                     | 9.2                 | 1 <sup>st</sup>        |
| 3                     | 9.3                 | 1 <sup>st</sup>        |
| 3                     | 9.4                 | 1 <sup>st</sup>        |
| 3                     | 9.5                 | 1 <sup>st</sup>        |
| 3                     | 9.6                 | 1 <sup>st</sup>        |
| 3                     | 10                  | 2 <sup>nd</sup>        |
| 3                     | 10.1                | 2 <sup>nd</sup>        |
| 3                     | 11                  | 4 <sup>th</sup>        |
| 3                     | 12                  | 4 <sup>th</sup>        |
| 3                     | 13                  | 3 <sup>rd</sup>        |
| 3                     | 14                  | 3 <sup>rd</sup>        |
| 3                     | 14.1                | 2 <sup>nd</sup>        |
| 3                     | 14.2                | 2 <sup>nd</sup>        |
| 3                     | 14.3                | 2 <sup>nd</sup>        |
| 3                     | 14.4                | 1 <sup>st</sup>        |
| 3                     | 14.5                | 1 <sup>st</sup>        |
| 3                     | 15                  | 2 <sup>nd</sup>        |
| 3                     | 16                  | 3 <sup>rd</sup>        |
| 3                     | 17                  | 4 <sup>th</sup>        |
| 3                     | 18                  | 3 <sup>rd</sup>        |
| 3                     | 19                  | 4 <sup>th</sup>        |
| 3                     | 20                  | 4 <sup>th</sup>        |
| 3                     | 21                  | 4 <sup>th</sup>        |
| 3                     | 22                  | 3 <sup>rd</sup>        |
| 3                     | 23                  | 3 <sup>rd</sup>        |
| 3                     | 24                  | 1 <sup>st</sup>        |
| 3                     | 25                  | 1 <sup>st</sup>        |
| 3                     | 26                  | 2 <sup>nd</sup>        |

**RESALE OF REGULATED TELECOMMUNICATION SERVICES**  
**WN U-43**

| <b><u>SECTION</u></b> | <b><u>SHEET</u></b> | <b><u>REVISION</u></b> |
|-----------------------|---------------------|------------------------|
| 3                     | 1                   | 1 <sup>st</sup>        |