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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

March 8, 2004

Ms. Carole Washburn  
Secretary  
Washington Utilities & Transp. Comm.  
1300 S. Evergreen Park Dr. SW  
P.O. Box 47250  
Olympia, WA 98504-7250

Re: *In the Matter of Qwest Corporation's Notice of Modifications to Exhibit B and Exhibit K to the Statement of Generally Available Terms*, Docket No. \_\_\_\_\_ ; *In the Matter of the Six-Month Review of Qwest Corporation's Performance Assurance Plan*, Docket No. UT-033020

Dear Ms. Washburn:

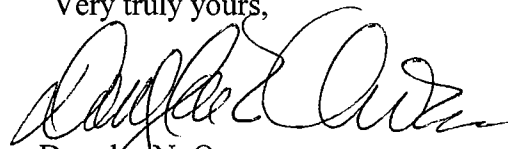
This letter replies to the Staff's Responsive Comments relating to Qwest's compliance filing modifying Exhibits B and K of the SGAT. Staff's comments acknowledge that the Staff's concern is not related to the immediate compliance filing, but raise the concern that PID PO-20, Manual Service Order Accuracy, was not contained in the replacement Exhibit B which Qwest filed on February 17, 2004. Qwest would like to clarify this issue by explaining how it came to be that PO-20 is contained in a separate exhibit to the Washington SGAT, namely Exhibit B1.

The current performance measurement PO-20, Manual Service Order Accuracy, was developed during Qwest's early 271 applications with the FCC. At the time reporting commenced, performance measurements were subject to the managerial processes of the Regional Oversight Committee ("ROC") and the ROC did not address the inclusion of PO-20 in the Performance Indicator Definitions ("PID") document. This Commission accepted Qwest's SGAT filing, which contained Exhibit B (the "ROC PID Document") without PID PO-20, in late 2002. PID PO-20 had not then been approved by the ROC and was not then required in all of Qwest's states. The intent of Exhibit B to the SGAT was that it reflect the ROC approved PIDs and be identical in all Qwest's states. Therefore PID PO-20 was filed as a separate Exhibit B1 to the SGAT.

Carol Washburn  
March 8, 2004 – page 2

Qwest has discussed this issue with Staff, and believes that Staff's concerns may lie more with the timing of a revision to Exhibit B to include PO-20, rather than with a concern that Qwest has omitted a required PID from its Washington SGAT. Qwest can represent in that regard that after the events discussed above, Qwest and the CLECs began collaboratively addressing revisions to PO-20. Those discussions are now in the final stages of negotiation within the auspices of the Long Term PID Administration, the inheritor of the ROC's performance measurement-related processes. Once agreement on the revised PO-20 is reached with the parties, Qwest will file for the removal of Exhibit B1 and incorporate the revised PO-20 into Exhibit B. If the parties cannot reach agreement, disputed issues appropriate for the LTPA to consider will be worked through the LTPA's impasse process and then potentially the individual states' dispute resolution processes.

Very truly yours,



Douglas N. Owens

cc: Lisa Anderl  
Mark Reynolds  
Barbara Brohl  
Parties