

1 A. Qwest objects because Eschelon's change does not reflect Qwest's current practice
2 in Washington. Under the emergency conditions detailed in the PCAT (Exhibit
3 RA-9), Qwest offers design and non-design service expedites for free in
4 Washington. Qwest offers expedites to CLECs on the same terms and conditions
5 as Qwest's retail customers in all states, consistent with Qwest's obligation to
6 CLECs. Qwest does not offer any expedites for a flat rate charge of \$100 as
7 proposed by Eschelon. The ICB listing in section 9.20.14 allows Qwest to charge
8 current retail rates. Eschelon argues that Qwest's current rate is not appropriate
9 because it is not a cost-based rate.³⁹ However, the expedite charge should not be
10 cost-based; expedites are not UNEs. Expedites are premium services.

11
12 **Q. WHICH LANGUAGE SHOULD THIS COMMISSION CHOOSE FOR THE**
13 **INTERCONNECTION AGREEMENT REGARDING EXPEDITES AND**
14 **EXPEDITE CHARGES?**

15 A. Qwest's language is more reasonable, supports parity in services, and is based on
16 the appropriate terms for expediting orders. This Commission should approve
17 Qwest's language for this section of the Interconnection Agreement.

18 **X. ISSUES 12-68: OSS COSTS**

19 **Q. DO QWEST AND ESCHELON HAVE DIFFERENCES REGARDING ISSUE**
20 **12-68 REGARDING CHARGES FOR SUPPLEMENTAL ORDERS?**

21 A. Yes. Qwest proposes the following language:

22
23 12.2.3.2 There is no transaction charge for the physical act of a CLEC
24 submitting a supplement or re-submitting a service request.

³⁹ Eschelon has not provided a cost study to support its rate either, thus implying that the rate need not be cost-based.