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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of the
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST Communications,
Inc.'s Statement of Generally Available Terms
Pursuant to Section 252(f) of the
Telecommunications Act of 1996

Docket No. UT-003040

**QWEST'S SUPPLEMENTAL AUTHORITY
REGARDING PROPORTIONAL PRICING
OF FACILITIES USED FOR BOTH INTER-
CONNECTION AND SPECIAL ACCESS**

On April 5, 2002, Qwest Corporation ("Qwest") filed its Notice of Updated Statement of Generally Available Terms and Conditions ("SGAT") and its Demonstration of Compliance with Commission Orders. Among the matters addressed in those filings was SGAT Section 7.3.1.1.2, which addresses the applicable rates for entrance facilities used for both local interconnection and special access services. The Commission required Qwest to apply TELRIC rates to the portion of the facility used for local interconnection and special access rates to the portion used for private line or special access services. See WUTC 26th Supplemental Order at ¶¶ 13-16. Electric Lightwave, Inc. ("ELI") and AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services, on behalf of TCG Seattle and Oregon (collectively, "AT&T"), have responded to Qwest's filings concerning this issue, among others.

**QWEST'S SUPPLEMENTAL AUTHORITY
REGARDING PROPORTIONAL PRICING
OF FACILITIES USED FOR BOTH INTER-
CONNECTION AND SPECIAL ACCESS**

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1 The parties addressed this issue in oral argument to the Commission on April 25, 2002.

2 Qwest would like to call the Commission's attention to a recent decision by the New Mexico
3 Public Regulation Commission. On May 7, 2002, that Commission reversed its initial decision and
4 withdrew its order requiring proportional pricing (or "ratcheting") of these facilities. Order on Rehearing
5 Concerning Proportional Pricing System for Entrance Facilities, *In the Matter of Qwest Corporation's*
6 *Section 271 Application and Motion for Alternative Procedure to Manage the Section 271 Process*
7 (NM PRC May 7, 2002). Qwest has attached a copy of this Order as Attachment A. As does the New
8 Mexico Commission, Qwest continues to believe this Commission should not order proportional pricing
9 at all. At a minimum Qwest's proposed pricing of spare facilities and its limitation of proportional pricing
10 to facilities obtained from Qwest's intrastate tariff are appropriate.

11 Respectfully submitted this 16th day of May, 2002.

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QWEST

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