

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Second Six-Month)	
Review of)	
)	DOCKET NO. UT-043007
QWEST CORPORATION'S)	
)	
Performance Assurance Plan)	
)	
.....)	
In the Matter of the Petition of)	DOCKET NO.
)	
QWEST CORPORATION)	QWEST CORPORATION'S
)	NOTICE OF DELETION OF
To Modify its Statement of Generally)	EXHIBIT B-1 AND
Available Terms and Conditions)	MODIFICATIONS TO EXHIBIT B
)	AND EXHIBIT K TO THE
)	STATEMENT OF GENERALLY
.....)	AVAILABLE TERMS AND
)	CONDITIONS

INTRODUCTION

Qwest Corporation (“Qwest”) submits an updated Exhibit B to the Statement of Generally Available Terms and Conditions (“SGAT”) comprising Version 8.0, which is the Performance Indicator Definitions (“PIDs”). Copies of updated Exhibit B are attached.¹ Qwest hereby requests that Exhibit B-1 be deleted from the SGAT.² Qwest also submits its revised Qwest Performance Assurance Plan (“QPAP”) Exhibit K for Washington to modify the QPAP, to reflect changes from the June 25, 2004 filing of an updated Exhibit B that was approved in Order No. 7 and other changes that were the subject of Docket UT-043007 and as

¹ Qwest is submitting “clean” and “red-lined” versions of Exhibit B, as modified.

to which Qwest and the participating CLECs have reached agreement in the Settlement of Disputed Issues that is also filed herewith. Attached is the revised QPAP.³

DESCRIPTION OF CHANGES

These submissions result in part from work during Long Term PID Administration (“LTPA”) sessions where participants identified and agreed upon a number of modifications to the PIDs. The principal change in this category is the addition to the QPAP of Expanded PO-20 and the deletion of Exhibit B-1 containing the old PO-20 and the removal of references in the QPAP to that old version of the PID. The parties to Docket UT-043007 other than Commission Staff agreed on the modifications to the QPAP for the substitution of Expanded PO-20 for the old PO-20. In addition, the parties to Docket UT-043007 reached agreement on the parity standard for Line Splitting for the MR-3, 4, 6 and 8 and OP-5A PIDs, the reporting of Loop Splitting in the PO-5, OP-3 through 6 and 15 and MR-3, 4 and 6 through 8 PIDs with a diagnostic standard, the use of certain standards for xDSL-I capable loops in the OP and MR PIDs, and the making available by Qwest of aggregate payment reports.⁴

A. Changes to Exhibit B appearing in Version 8.0

1. Version 8.0 of Exhibit B contains changes to the MR-3, 4, 6 and 8, and OP-5A PIDs for Line Splitting to adopt the standard of parity with Qwest DSL for that product.

² Qwest is submitting a “redline” version of Exhibit B-1.

³ The QPAP can also be found as Exhibit K to the SGAT. Qwest submits a “clean” and redline version of the QPAP, as modified.

⁴ Commission Staff did not agree on the parity standard for Line Splitting that was agreed to by the other parties or on the absence of a Tier 2 assignment for Expanded PO-20 that was also agreed to by the other parties.

2. Version 8.0 of Exhibit B contains changes to the PO-5, OP-3 through OP-6 and OP-15 and MR-3, 4 and 6 through 8 PIDs to include Loop Splitting as a separately reported product, with a diagnostic standard.

3. Version 8.0 of Exhibit B contains changes to include x-DSL loops in: the OP-3 PID with a standard of 90%; the OP-4 PID with a standard of six business days; the OP-5A PID with a standard of parity with Qwest DSL; the OP-5B, OP-5R and OP-5T PIDs with a diagnostic standard; the OP-6 PID with a standard of parity with Qwest IDSL with dispatch; the MR-3, MR-4, MR-6 and MR-8 PIDs with a standard of parity with Qwest IDSL; and the MR-10 PID with a diagnostic standard.

B. QPAP Changes resulting from Version 8.0 of Exhibit B and the Deletion of Exhibit B-1

Attachment 1 to Exhibit K includes PO-20 as a Tier 1 Medium measurement, and references to PO-20 have been removed from Table 5 and Section 7.4. Attachment 1 includes footnotes to the PO-20 measurement that reflect the low volume relief and the burn in periods that are applicable to this new measurement.

With this filing and pursuant to section 16 of the QPAP, Qwest has modified the QPAP to reflect certain changes. Qwest respectfully requests that the Commission issue its order permitting the changes to become effective no later than October 1, 2004. During implementation of PO-20 Phase 1, reporting will occur on the existing Exhibit B-1 and on the new PO-20 in Exhibit B, Version 7.1. Any required payments will be made under the existing Exhibit B-1 ending with July, 2004 data reported in August, 2004. The three month measurement stabilization for each Phase will allow Qwest to adequately assess the

measurement's reliability and validate results. For example, the QPAP would apply to Phase 1 beginning in October, 2004 on an ongoing basis. Three months after the implementation of Phase 2, the QPAP would apply to both Phase 1 and Phase 2 on an ongoing basis. This cumulative approach would continue until all four phases are subject to the QPAP.

C. Conclusion

By making this filing in Docket No.UT-003022, Qwest requests that the Commission approve Exhibit B and the QPAP, as revised and modified, designate PO-20 as Tier 1 Medium without a Tier 2 assignment, establish a low-volume-differentiated benchmark for PO-20, and allow PO-20 a measurement stabilization for three months with the implementation of each phase, meaning that Qwest will make any required payments for PO-20 on the prior phase or phases, but under Exhibit B-1 for Phase 1 implementation, until October 1, 2004.

Qwest requests that the Commission permit the amended Exhibit B to go into effect no later than 60 days after submission in accordance with 47 U.S.C. § 252(f)(3), and preferably no later than October 1, 2004. In the interim, Qwest will report on the expanded PO-20 contained within Exhibit B; Qwest will also report and make payments on the existing PO-20 contained in Exhibit B-1 until the effective date of the order the Commission issues approving Qwest's request to delete that exhibit. Further, Qwest requests pursuant to Section 16 of the QPAP, that the changes shall automatically apply to all existing interconnection agreements that currently contain Exhibit B, Exhibit B-1 and the QPAP, Exhibit K as exhibits.

REQUESTED RELIEF

Qwest respectfully requests that the Commission permit the amended Exhibit B and Exhibit K to go into effect no later than October 1, 2004 and to approve the simultaneous deletion of Exhibit B-1 in accordance with 47 U.S.C. § 252(f)(3).

Qwest submits this notice in the two dockets captioned above. Pursuant to section 16 of Exhibit K, the changes shall automatically apply to and modify all existing interconnection agreements that currently contain Exhibit K, the QPAP, as an exhibit.

Respectfully submitted this 27th day of August, 2004

QWEST CORPORATION

LAW OFFICES OF DOUGLAS N. OWENS

Douglas N. Owens (WSBA 641)
Counsel for Qwest Corporation

Lisa A. Anderl (WSBA 13236)
Qwest Corporation
Associate General Counsel
1600 Seventh Ave., Room 3206
Seattle, WA 98191
(206) 345 1574

Adam L. Sherr (WSBA 25291)
Qwest Corporation
Senior Attorney
1600 Seventh Ave., Room 3206
Seattle, WA 98191
(206) 398 2507

CERTIFICATE OF SERVICE

I certify that a copy of Notice of Modifications of Qwest Corporation was deposited in the U.S. Mail on August 27, 2004, to the following parties:

<p>Dennis D. Ahlers** Eschelon Telecom, Inc. 730 Second Avenue South, Suite 1200 Minneapolis, MN 55402 Phone: (612) 436-6249 Fax: (612) 436-6349 E-Mail: ddahlers@eschelon.com</p>	<p>Arthur A. Butler Ater Wynne, LLP 601 Union Street, Suite 5450 Seattle, WA 98101-2327 Phone: (206) 623-4711 Fax: (206) 467-8406 E-Mail: aab@aterwynne.com</p>
<p>Robert Cromwell Public Counsel Office of the Attorney General 900 4th Avenue, Suite 2000 Seattle, WA 98164-1012 Phone: (206) 464-6595 Fax: (206) 389-2058 E-Mail: robertc1@atg.wa.gov</p>	<p>Karen S. Frame Senior Counsel Covad Communications Company 7901 Lowry Blvd. Denver, CO 80230 Phone: (720) 208-1069 Fax: (720) 208-3350 E-mail: kframe@covad.com</p>
<p>Brooks Harlow Miller, Nash, Wiener, Hager & Carlsen 4400 Two Union Square 601 Union Street Seattle, WA 98101 Phone: (206) 622-8484 Fax: (206) 622-7485 E-Mail: harlow@millernash.com</p>	<p>Michael B. Hazzard Kelley Drye & Warren, LLP 1200 Nineteenth Street, N.W. Fifth Floor Washington, DC 20036 Phone: (703) 918-2316 Fax: (703) 918-2450 E-mail: mhazzard@kelleydrye.com</p>
<p>Lauraine Harding Senior Manager McLeodUSA Telecom Services, Inc. 6400 C Street SW P.O. BOX 3177 Cedar Rapids, IA 52405-3177 Phone: (319) 790-6480 Fax: (319) 790-7901</p>	<p>Andrew O. Isar Director – State Affairs Telecommunications Resellers Assoc. 7901 Skansie Avenue, Suite 240 Gig Harbor, WA 98335 Phone: (253) 851-6700 Fax: (253) 851-6474 E-Mail: aisar@harbor-group.com</p>

QWEST CORPORATION'S
NOTICE OF MODIFICATIONS

<p>Gregory J. Kopta** Davis Wright Tremaine 2600 Century Square, 25th Floor 1501 Fourth Avenue Seattle, WA 98101-1688 Phone: (206) 622-3150 Fax: (206) 628-7699 E-Mail: gregkopta@dwt.com</p>	<p>Michel Singer-Nelson** MCI WorldCom Inc. Law and Public Policy 707 17th Street, Suite 4200 Denver, CO 80202 Phone: (303) 390-6106 Fax: (303) 390-6333 E-Mail: michel.singer_nelson@mci.com</p>
<p>Mary B. Tribby AT&T 1875 Lawrence Street Suite 1575 Denver, CO 80202 Phone: (303) 298-6508 Fax: (303) 298-6301 E-Mail: mbtribby@att.com</p>	<p>Barbara Young Sprint 902 Wasco Street, MS: ORHDRA0412 Hood River, OR 97031 Phone: (541) 387-9850 Fax: (541) 387-9753 E-Mail: barbara.c.young@mail.sprint.com</p>

Dated this 27th day of August, 2004.

Douglas N. Owens