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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 those  
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  
DEMONSTRATION OF §272(e)(1)  
COMPLIANCE – JUNE 11, 2002

In the 34th Supplemental Order (*34th Order*), the Washington Utilities and Transportation Commission (Commission) required Qwest to “modify its chart demonstrating section 272(e)(1) compliance by including information similar to that provided by Verizon in Pennsylvania and BellSouth for Georgia and Louisiana, i.e., by describing how the section 272(e)(1) measures are defined and calculated.” *34th Order* at ¶189. Other requirements are set forth in paragraphs 190 and 191 of the *34th Order*, and include requirements for additional explanations of Qwest’s reporting measures.

As the Commission noted in its *31<sup>st</sup> Supplemental Order*,<sup>1</sup> Section 272(e)(1) requires BOCs, after receiving 271 approval, to disclose data on provisioning intervals so that unaffiliated parties can evaluate the performance the BOC provides itself and its affiliates and compare such performance to the service quality provided to competing carriers. Qwest has committed that it will make such disclosures in

<sup>1</sup> *31<sup>st</sup> Supplemental Order Granting Qwest’s Petition for Reconsideration of the 24th Supplemental Order and Granting and Denying Petitions for Reconsideration of the 28th Supplemental Order*, Docket Nos. UT-003022 and 003040, April 15, 2002 (“*31<sup>st</sup> Supplemental Order*”), ¶ 50.

1 accordance with FCC requirements and, pursuant to the Commission's 31<sup>st</sup> *Supplemental Order*,  
2 submitted a chart depicting the format it plans to use to make these disclosures.

3 In 34<sup>th</sup> *Supplemental Order*, the Commission directed Qwest to modify that chart to "includ[e]  
4 more detail about how the section 272(e) measures are defined and calculated,"<sup>2</sup> in a manner similar to  
5 that provided by Verizon in its Pennsylvania 271 application and BellSouth in its 271 application for  
6 Georgia and Louisiana.<sup>3</sup> Qwest has now done so, and its chart as modified is attached hereto as  
7 Attachment A. Qwest's modified format describes how each performance measure in its chart is defined  
8 and calculated. Like BellSouth's format, Qwest also provides the output convention for each measure.<sup>4</sup>  
9 As also required by the 34<sup>th</sup> *Supplemental Order*,<sup>5</sup> these definitions and calculation methods are  
10 consistent with those in the applicable PIDs, since the ordering processes for local exchange access and  
11 long distance access are the same. Each performance measure that has a corresponding PID is defined  
12 and calculated in a way that conforms to that used in connection with that PID (which is referenced in  
13 each case in the chart).

14 The Commission also ordered Qwest to explain "seeming inconsistencies" between its 272(e)(1)  
15 commitment and its testimony that it cannot disaggregate data on special access services provided to itself  
16 from data on such services provided to its competitors.<sup>6</sup> That testimony was that Qwest (at the time of  
17 the testimony) did not "currently" need to and did not differentiate on the "retail" side between service  
18 provided to affiliated and non-affiliated customers. Tr. 6983-84, 6986. However, Qwest anticipates no  
19 barrier to distinguishing and separately reporting data on special access services provided to the BOC  
20 and to BOC affiliates at such time as it initiates in-region interLATA service following 271 approval. In

21 <sup>2</sup> 34<sup>th</sup> *Supplemental Order Regarding Qwest's Demonstration of Compliance with Commission Orders*, Docket Nos.  
UT-003022 and 003040, May 29, 2002 ("34<sup>th</sup> Supplemental Order"), ¶¶ 125, 189.

22 <sup>3</sup> See Declaration of Susan C. Browning, *In the Matter of Application of Verizon Pennsylvania Inc., Verizon Long*  
23 *Distance, Verizon Enterprise Solutions, Verizon Global Networks Inc., and Verizon Select Services Inc. for*  
24 *Authorization To Provide In-Region, InterLATA Services in Pennsylvania* (filed Sep. 19, 2001) at 20-21 & Atts. 14 and  
25 *Louisiana Affidavit").*

26 <sup>4</sup> See BellSouth Georgia-Louisiana Affidavit, Exhibit JAR/CKC 7.

<sup>5</sup> 34<sup>th</sup> *Supplemental Order* ¶¶ 126, 190.

<sup>6</sup> 34<sup>th</sup> *Supplemental Order* ¶¶ 127, 191.

