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November 12, 2008

Via Email and Federal Express

David W. Danner, Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: *In re Petition of Qwest*, Docket No. UT-073034

Dear Mr. Danner:

XO Communications Services, Inc., and tw telecom of washington, llc (collectively "Joint CLECs") provide the following Initial Comments in response to the Commission's Notice of Opportunity to File Comments dated October 20, 2008 ("Notice"). The Joint CLECs respond to the questions posed in the Notice as follows:

1. The Joint CLECs agree with the Commission that there is no need to conduct a five and one-half year review of Qwest's Performance Assurance Plan ("QPAP") at this point in time.
2. The Joint CLECs do not see a need to conduct the five and one-half year review described in the QPAP at any time in the foreseeable future because the Joint CLECs believe that the QPAP will always be necessary to help ensure that Qwest provides adequate wholesale service quality as required under federal and state law, including Qwest' interconnection agreements. If the Commission is to conduct such a proceeding, however, it should not do so before the period approximately six months prior to the expiration of Qwest's AFOR in 2011.
3. In light of the Commission's orders in the Qwest AFOR proceeding, Docket No. UT-061625, including Order 08, and the modifications to Sections 1.1 and 16.3 of the QPAP the Commission approved, there should be no operational or effective changes to any measure, submeasure, Tier 1 payment, or Tier 2 payment on or after December 23, 2008, unless and until the AFOR expires and/or the Commission determines otherwise.

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The Joint CLECs appreciate the opportunity to provide comments to the Commission on these issues. Please contact me if you have any questions about these comments.

Sincerely,

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to read 'G. Kopta'.

Gregory J. Kopta

cc: Parties of Record