

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Petition of Qwest
Corporation for Arbitration with Eschelon
Telecom, Inc. Pursuant to 47 U.S.C. Section
252 of the Federal Telecommunications Act of
1996**

Docket No. UT-063061

EXHIBIT DD-19

TO THE

REBUTTAL TESTIMONY OF DOUGLAS DENNEY

ON BEHALF OF ESCHELON TELECOM, INC.

DECEMBER 4, 2006



September 29, 2006

Doug Denney
Eschelon Telecom Inc.
730 2nd Av S Suite 900
Minneapolis, MN 55402
dkdenney@eschelon.com

TO: Doug Denney

Announcement Date: September 29, 2006
Effective Date: October 1, 2006
Document Number: BILL.09.29.06.A.001496.ColloInventoryAvailableError
Notification Category: Billing
Target Audience: CLECs
Subject: Collocation - Available Inventory Augment QPF Error

It has come to Qwest's attention that a charge for Qwest Available Inventory (AI) Special Sites has been incorrectly quoted in the past. Qwest has been charging the Special Site Assessment Fee on all AI Special Site requests, whether they were purchased with or without an augment.

Per terms and conditions outlined in section 8.3.1.20 of the Interconnection Agreement, the standard QPF defined in your Exhibit A will apply in place of the Special Site Assessment Fee when you request an augment to the existing AI Special Site at the same time you are purchasing that site.

*"8.3.1.20 Collocation Available Inventory Charges. For standard Qwest Postings of Collocation Available Inventory, CLEC will be charged the standard Collocation rates, including the applicable QPF or Engineering and Planning Fee. CLEC will also be charged for removal of terminations. **For Special Sites, assuming CLEC will be charged a Special Site Assessment Fee instead of the standard QPF, unless CLEC requests an augment to the existing site in its initial Collocation Application, then the standard approved QPF will be charged as defined in Exhibit A.** CLEC ordering a Special Site, in addition to the standard Collocation rates, will also be charged a nonrecurring Network Systems Administration Fee for the systems and record updates required to transfer the Collocation Site to assuming CLEC and, if a site survey is requested by CLEC, a Site Survey Fee. Any CLEC equipment left in the site will be transferred to assuming CLEC at no charge. Recurring charges for all products and services will be charged at rates listed in assuming CLEC Interconnection Agreement without a discount."*

Effective October 1, 2006 Qwest will modify its Quoting Process to correctly apply the Special Site Assessment Fee (if no augments are requested) or the standard QPF (if an augment is requested) pursuant to the terms of your Interconnection Agreement. This change will apply to Special Sites that are submitted on or after October 1, 2006. No past true ups will be performed to collect the higher QPF amount where it was not previously applied.

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager, Joshua Nielsen on (801) 239-5335. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest Corporation

Note: If you would like to unsubscribe to mailouts please go to the "Subscribe/Unsubscribe" web site and follow the unsubscribe instructions. The site is located at:

<http://www.qwest.com/wholesale/notices/cnla/maillist.html>

cc: Patty Hahn
Joshua Nielsen

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