

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

QWEST CORPORATION

Petition for Commission Approval of
Stipulation Regarding Certain
Performance Indicator Definitions and
Qwest Performance Assurance Plan
Provisions

DOCKET NO. UT-073034

QWEST'S COMMENTS IN RESPONSE
TO COMMISSION'S 10/20/08 NOTICE OF
OPPORTUNITY TO FILE COMMENTS

- 1 On October 20, 2008, the Washington Utilities and Transportation Commission (“Commission”) requested comments on a set of three questions in connection with the issue of whether further action is necessary in a five and one-half year review proceeding. Qwest Corporation (“Qwest”) hereby responds to the Commission’s questions.
- 2 Question 1. Aside from determining whether the issues pending in the petition for review of Order 07, the initial order in this docket, should be addressed in a five and one-half year review proceeding, the Commission does not believe there is a need to conduct such a proceeding at this point in time, given the fact that the QPAP remains in place for the duration of the AFOR. If any interested person or party believes there is a need to conduct such a proceeding now, please explain why.

Qwest's Response: Qwest does not believe that it is necessary to conduct a five and one-half year review proceeding at this time if the pending issues from Order 07 were to be resolved without conducting a five and one-half year review. With these two issues resolved, Qwest would not object to deferring the "five and one-half year" review until approximately six months prior to the new expiration date.

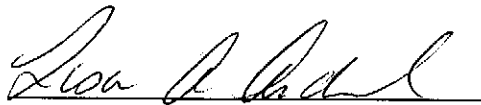
3 Question 2. Should the Commission defer the commencement of a proceeding to take the place of a five and one-half year review to the period approximately six months prior to the expiration of Qwest's AFOR in 2011?

Qwest's Response: Yes.

4 Question 3. Given the modifications to Sections 1.1 and 16.3 of the QPAP approved in Order 06 in Docket UT-073034, what operational or effective changes to any measure, submeasure, Tier 1 payment, or Tier 2 payment, if any, will occur on or after December 23, 2008 (the original expiration date of the QPAP)?

Qwest's Response: By the terms of the QPAP, only the submeasures identified in Attachment 3 and payments will continue beyond December 23, 2008. This provision and deadline was not changed in either the AFOR proceeding or this docket. Thus, the QPAP continues to exist and to operate in accordance with its terms. One of those terms specifies that only certain submeasures and payments, not all of them, continue beyond six years.

QWEST



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