

November 24 2008

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

Re: *In re Petition of Qwest*
Docket UT-073034

Dear Mr. Danner:

The Commission's October 20, 2008, Notice of Opportunity to File Comments regarding Section 16.3 of Qwest's Performance Assurance Plan allows for two rounds of comments, with responsive comments due today.

Staff's only response is to note that the other parties' initial comments (Qwest's, on the one hand, and those of the CLECs Integra, XO Communications Services, Inc., and tw telecom of washington, llc, on the other) indicate an apparent disagreement with regard to the third question in the Commission's Notice.

Qwest's comments indicate its position that only the submeasures identified in Attachment 3 and payments will continue beyond December 3, 2008. The CLECs' comments, however, state a different understanding—that there should be no change to any measure, submeasure or payments until the AFOR expires or the Commission determines otherwise.

Staff's initial comments anticipated this controversy and therefore Staff has nothing further to add in response to the other parties' initial comments.

Sincerely,

JONATHAN C. THOMPSON
Assistant Attorney General

JCT:emd
Enclosures
cc: Parties