

# HOGAN & HARTSON

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August 9, 2002

**Ex Parte**

*BY ECFS*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket No. 02-148  
Qwest Communications International Inc.  
Consolidated Applications for Authority to Provide  
In Region, InterLATA Services in Colorado, Idaho,  
Iowa, Nebraska and North Dakota**

**WC Docket No. 02-189  
Qwest Communications International Inc.  
Consolidated Applications for Authority to Provide  
In Region, InterLATA Services in Montana, Utah,  
Washington and Wyoming**

Dear Ms. Dortch:

In response to questions from FCC Staff, Qwest hereby advises the Commission that it will file requests with the Regulatory Authorities in each of the nine states for which Qwest has pending Section 271 applications asking that each Authority include in Qwest's Performance Assurance Plan the "Manual Service Order Accuracy" performance measurement, PO-20, as described in the Reply Declaration of Lynn M. V. Notarianni and Christie L. Doherty at ¶¶ 90-92. Qwest will make this request through a filing in each state on or before August 18, 2002,

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and will request that the PID, a 95% performance standard and associated payments be effective coincident with the PAP becoming effective in that state.

In its state filings, Qwest will propose that PO-20 be included as a Tier 2 measurement consistent with the payment approach employed by the PAPs for region-wide measurements, GA-1, -2, -3, -4, and -6; PO-1; OP-2; and MR-2. Section 7.4 of the QPAPs and Appendix A of the CPAP (pp. 43-44) provide for per measurement payments to the state for these measurements based on the degree of non-conformance of aggregate regional performance results. Because PO-20 is disaggregated into two product categories, Resale POTS/UNE-P POTS and Unbundled Loop (Analog and Non-loaded 2-wire), Qwest has disaggregated the payment levels. The proposed payment structure for PO-20 is as follows:

**TIER-2 PER MEASUREMENT PAYMENTS TO STATE FUNDS**

Measurement	Performance	State Payment	14-State Payment
<b>PO-20</b>			
Resale POTS/ UNE-POTS	1% or lower	\$500	\$7,000
	>1% to 3%	\$2,500	\$35,000
	>3% to 5%	\$5,000	\$70,000
	>5%	\$7,500	\$105,000
Unbundled Loops (Analog and Non-Loaded 2 Wire)	1% or lower	\$500	\$7,000
	>1% to 3%	\$2,500	\$35,000
	>3% to 5%	\$5,000	\$70,000
	>5%	\$7,500	\$105,000

The 20-page limit does not apply to this filing.

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Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,



Yaron Dori  
Counsel for Qwest

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