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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of the
Telecommunications Act of 1996

Docket No. UT-003022

**QWEST'S REQUEST FOR ACCEPTANCE OF
PO-20 FOR INCLUSION IN THE QPAP**

In the Matter of U S WEST Communications,
Inc.'s Statement of Generally Available Terms
Pursuant to Section 252(f) of the
Telecommunications Act of 1996

Docket No. UT-003040

Qwest Corporation ("Qwest"), through its undersigned counsel, respectfully requests that the Commission approve the attached PO-20 performance measurement and payment scheme for inclusion in the Qwest Performance Assurance Plan ("QPAP") as described herein. As grounds for its request, Qwest states as follows:

1. In the Reply Declaration of Lynn M. V. Notarianni and Christie L. Doherty filed with the Federal Communications Commission ("FCC") on July 29, 2002, in Docket No. WC-Docket No. 02-148, ¶¶ 90-92, the Declarants explained that Qwest began providing performance results based on a Manual Service Order Accuracy Performance Indicator Definition ("PID"), PO-20, with June results reported in July 2002. In a subsequent *ex parte* communication with the FCC, Qwest Communications agreed that it would request that this Commission accept Qwest's proposed PO-20, with a 95%

1 benchmark standard, for inclusion in the QPAP in the manner described below to be effective coincident
 2 with the effective date of the QPAP. (See Attachment 1, Qwest *ex parte* dated August 9, 2002). The
 3 95% standard is consistent with order accuracy measurements in other BOC regions.

4 2. Qwest is filing this request in conformance with that *ex parte* and requests that the
 5 attached PO-20 (See Attachment 2) be included in section 7.4 of the QPAP which contains the payment
 6 amounts for other Tier 2 regional measurements, GA-1, 2, 3, 4, 6; PO-1; OP-2; and MR-2. Section 7.4
 7 provides for per measurement payments to the state for the aforementioned measurements based upon
 8 the degree of non-conformance of aggregate regional performance results. Because PO-20 is
 9 disaggregated into two product categories, Resale POTS/UNE-P POTS and Unbundled Loop (Analog
 10 and Non-loaded 2-wire), Qwest has disaggregated the payment levels. The proposed payment structure
 11 for PO-20 is as follows:

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

I. Measurement	A. Performance	B. State Payment	C. 14-State Payment
II. PO-20			
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

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 22 With this filing, Qwest is providing a QPAP revised to include this change. (See Attachment 3).

23 3. Qwest requests that the Commission accept its proposal on an expedited basis so that the
 24 PID, 95% performance standard, and associated payments will be effective at the same time that the
 25 QPAP is effective. No prejudice to any party will result from the Commission's acceptance of this
 26 proposal. This filing does not eliminate the opportunity to consider changes to PO-20 in any long-term

1 PID forum or at the six-month review (as provided for under the PAP).

2 Wherefore, Qwest respectfully requests expedited Commission consideration and acceptance of
3 this proposal to include PO-20 in the QPAP for this state.

4 DATED this 19th day of August, 2002.

5 QWEST

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