

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation Into)
U S WEST Communications, Inc.'s) Docket No. UT-003022
Compliance With Section 271 of the)
Telecommunications Act of 1996)
_____)

In the Matter of U S WEST Communications,) Docket No. UT-003040
Inc.'s Statement of Generally Available)
Terms Pursuant to Section 252(f) of the)
Telecommunications Act of 1996)
_____)

ADDITIONAL STATEMENT OF SUPPLEMENTAL AUTHORITY

AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services on behalf of TCG Seattle and TCG Oregon (“AT&T”) submit their additional statement of supplemental authority attaching the Colorado Public Utilities Commission’s “Order Denying Motion” (attached). As support thereof, AT&T states as follows:

Qwest Corporation (“Qwest”) has requested that this Commission accept Qwest’s proposed PO-20 with a 95 percent benchmark standard for inclusion in Washington’s PAP. On September 18, 2002, the Colorado Public Utilities Commission addressed and denied Qwest’s analogous motion for Qwest’s proposed PO-20 inclusion in Colorado’s PAP, indicating that “PO-20 as currently defined will result in more confusion and errors in reporting.”¹ The Commission further stated “(we) believe the best way to handle the development of a PID is with the upfront input and collaboration of all parties.”² For

¹ Order Denying Motion, In the Matter of Qwest Corporation’s Colorado Performance Assurance Plan, Colorado Public Utilities Commission, Docket No. 02M-259T, Decision No. C02-1029 (September 18, 2002) at p.3.

² *Id.*

these reasons, the Colorado Public Utilities Commission denied Qwest's Request for Acceptance of PO-20 for Inclusion in the Colorado Performance Assurance Plan.

Respectfully submitted this 25th day of September, 2002.

**AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC., AND
AT&T LOCAL SERVICES ON BEHALF
OF TCG SEATTLE AND TCG OREGON**

By: _____

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