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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

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'S
NOTICE OF UPDATED EXHIBIT A
TO STATEMENT OF GENERALLY
AVAILABLE TERMS AND
CONDITIONS**

Qwest Corporation ("Qwest"), through its undersigned counsel, submits this notice of its update to Exhibit A of Qwest's Statement of Generally Available Terms and Conditions ("SGAT") in the State of Washington along with the Amended SGAT Exhibit A itself, which is filed herewith.¹ Qwest respectfully requests that the Commission allow this version of Exhibit Appendix A to go into effect pursuant to 47 U.S.C. § 252(f)(3)(B).

¹ Apart from the revisions to Exhibit A, Qwest did not change any terms and conditions set forth in the SGAT itself.

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I. DISCUSSION

Qwest most recently filed a complete SGAT in Washington on June 25, 2002, a Third Amended Exhibit A on September 26, 2002, and a Corrected Third Amended Exhibit A on October 7, 2002. In the Third Amended Exhibit A, the rates for switching and transport were calculated using a benchmarking approach that combined the costs for these rate elements when comparing rates between states.

In recent 271 filings, AT&T has asserted that benchmarking rates for switching and transport together, instead of through separate rate elements, violates the Act. Even though the standard practice before the FCC has been to combine these two elements when performing the benchmark comparisons, AT&T contends that each element must be reviewed in isolation. AT&T proffered this argument in Qwest's original 271 application for the states of Montana, Utah, Washington, and Wyoming, as well as Verizon's 271 application for New Hampshire. Although the FCC has never specifically accepted this argument, Qwest has decided to revise its benchmarking calculations to remove this issue from consideration in the 271 process.

Accordingly, Qwest calculated a new rate for shared transport in §9.8.1 of the proposed Fourth Amended Exhibit A using a benchmarking process that is separate for switching and transport. This resulted in individual rates for switching and transport that are equal to the previous rate elements, but a shared transport rate that is lower than previously filed. This approach will result in lower rates for CLECs, and should alleviate any concerns the FCC might have over the previously-combined rate elements.

Qwest points out that in the past, it has also filed tariff changes to reflect rate reductions such as this in the appropriate parallel tariff provisions. However, in this case there is no parallel tariff provision. The shared transport rate in the tariff is structured on a capacity basis, not a per-minute-of-use basis. Either rate structure is available to a CLEC, but the benchmarking process affected only the per-minute-of-use rates.

II. CONCLUSION

1 For the foregoing reasons, Qwest respectfully requests that the Commission allow this version of
2 Exhibit A to the SGAT to go into effect pursuant to 47 U.S.C. § 252(f)(3). Qwest would still request
3 that rates in the prior Exhibit A (Corrected Third Amended) become effective as of September 29, 2002
4 in order to have those rates effective at the same time as parallel tariff provisions that were effective the
5 same day.

6 RESPECTFULLY SUBMITTED this 17th day of October, 2002.

7 QWEST CORPORATION

8
9 By: _____
10 Lisa Anderl
11 Qwest Corporation
12 1600 7th Avenue, Room 3206
13 Seattle, WA 98191
14 (206) 345-1574

15 Blair A. Rosenthal
16 Qwest Corporation
17 1801 California Street, Suite 4900
18 Denver, Colorado 80202
19 (303) 672-2974

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