

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

**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

**COMMENTS OF QWEST CORPORATION**

Qwest Corporation ("Qwest") files these comments in response to the Notice of Modification of Commission Order and Notice of Opportunity to File Comments released by the Commission on July 21, 2003. Qwest addresses the three proposals set forth in the Notice.

First, the Commission proposes to rescind the requirements for Qwest to file requests to modify SGAT Exhibit A rates in a Tariff Advice Letter and to place all rates listed in Exhibit A into its tariffs. For reasons set forth below, Qwest supports rescinding these requirements.

Second, the Commission proposes that all requests to modify the SGAT be addressed in the Commission's open meeting on a 60-day calendar to correspond with the filing requirements of 47 U.S.C § 252(f). Qwest has no objection if the Commission chooses to review SGAT changes in the Commission's open meetings. However, pursuant to Section 252(f), if the Commission does not take action within 60-days after the date of submission, then the SGAT changes would automatically be

1 permitted to go into effect.

2 Finally, the Commission proposes to establish a 60-day filing requirement for changes to tariffs  
3 that may have a corresponding change in SGAT Exhibit A. Qwest understands that this proposal is  
4 intended to provide a more coordinated review process for the Commission. However, Qwest objects  
5 to this proposal because extending the time required before tariffs can become effective would hinder  
6 Qwest's ability to provide interconnection services to its customers and to be responsive to CLEC  
7 requests.

8 For example, recently Qwest has filed tariffs to implement rate reductions agreed to in Qwest's  
9 Change Management Process ("CMP").<sup>1</sup> The CMP process was established in this proceeding, and  
10 provides a forum for exchange and resolution between the CLECs and Qwest. If a 60-day requirement  
11 were established, Qwest's ability to promptly implement agreements reached with CLECs in the CMP  
12 process would be hindered.

13 A second issue concerns the filing of compliance tariffs ordered in the cost dockets. These tariff  
14 filings are complex and often supported with new cost studies. Currently, Qwest makes the compliance  
15 tariff filings and, after receiving Commission approval, files the updated SGAT Exhibit A. The added  
16 coordination and administrative work necessary to file both compliance tariffs and updated SGAT Exhibit  
17 A simultaneously would be burdensome. Additionally, filing changes to SGAT Exhibit A prior to the  
18 Commission approving the compliance tariffs could cause confusion, particularly in those cases where  
19 Qwest files replacement tariff pages, or is ordered to withdraw its tariff filing and file anew.<sup>2</sup>

20 The only parties who subscribe to services from Qwest's Interconnection and Resale tariffs are  
21 CLECs with interconnection and resale agreements. Qwest is unaware of any CLEC complaints or  
22 issues concerning the current process for filing changes to Qwest's tariffs or SGAT Exhibit A in  
23 Washington. Therefore, Qwest urges the Commission to allow Qwest's current process to remain in

24 \_\_\_\_\_  
25 <sup>1</sup> Temporary rate reduction for Loop Conditioning (UT-030615) and removal of Channel Regeneration charges (UT-  
031062).

26 <sup>2</sup> In a "worst-case" scenario, Exhibit A rates could become effective by operation of law after 60 days while the  
Commission was still in the process of reviewing the compliance filing.

1 effect. Under that process, Qwest files tariffs pursuant to the Commission rules and statutes and, as soon  
2 as it is reasonably possible, Qwest updates SGAT Exhibit A.

3 DATED this 4th day of August, 2003.

4 QWEST

5  
6 \_\_\_\_\_  
7 Lisa Anderl, WSBA # 13236  
8 Adam Sherr, WSBA # 25291  
9 Qwest  
10 1600 7<sup>th</sup> Avenue, Room 3206  
11 Seattle, WA 98191  
12 Phone: (206) 398-2500  
13 *Attorneys for Qwest*  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26