

Qwest Corporation
1600 7th Avenue Room 3206
Seattle, Washington 98191
(206) 345-1568
Facsimile (206) 343-4040



Mark S. Reynolds
Senior Director – Regulatory
Public Policy

October 31, 2008

Advice No. 3653T

Carole Washburn, Executive Secretary
Washington Utilities and
Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

Dear Ms. Washburn:

Qwest Corporation is forwarding for filing the sheets listed on Attachment A.

To ensure accurate jurisdictional reporting and reduce misuse of jurisdictional reporting, Qwest is modifying the Jurisdictional Report Requirements in Section 2 of its Access Service Tariff, by establishing a Percent Interstate Usage (PIU) floor for unidentified Feature Group D (FGD) terminating traffic.

When sufficient call detail is received to identify the jurisdiction of terminating FGD traffic, Qwest will continue to charge at the appropriate jurisdictional rate (Washington or interstate rate).

Terminating FGD traffic that does not contain sufficient call detail to identify the jurisdiction (unidentified traffic) will be assigned jurisdiction as follows:

- The first 3% of unidentified terminating traffic will continue to be jurisdictionally assigned based on the carrier's PIU report or, if the carrier has not filed a PIU report, a PIU of 50 (50% interstate – 50% intrastate) will be assigned per the current terms in Section 2.3.10.B.2.c.
- Unidentified traffic in excess of the 3% floor will be designated intrastate traffic and charged at Qwest's current Washington rates.

The proposed effective date of this filing is December 1, 2008. Notification has been sent to customers.

Qwest's proposed method of jurisdictional assignment for unidentified FGD traffic is similar to terms already in effect for Verizon in Washington and other states. (See Verizon Northwest Inc., Washington Access Tariff, Section 4, Sheets 280-281.)

WA2008-029

Qwest Corporation
1600 7th Avenue Room 3206
Seattle, Washington 98191
(206) 345-1568
Facsimile (206) 343-4040

Mark S. Reynolds
Senior Director – Regulatory
Public Policy

If you have questions concerning this filing, please contact Sue Henson at 206-345-4341.

Sincerely,

A handwritten signature in black ink that reads "Mark Reynolds". The signature is written in a cursive, flowing style with a prominent initial "M".

Mark Reynolds

ACCESS SERVICE
WN U-44

| <u>SECTION</u> | <u>SHEET</u> | <u>REVISION</u> |
|-----------------------|---------------------|------------------------|
| 2 | 12 | 3 |
| 2 | 12.1 | Original |
| 2 | 15 | 2 |