

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Six-Month)	
Review of Qwest Corporation's)	DOCKET NO. UT-033020
Performance Assurance Plan)	
)	WORLDCOM'S COMMENTS IN
)	RESPONSE TO ORDER NO. 2
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.....)	

WorldCom, Inc., on behalf of its regulated subsidiaries in Washington (n/k/a MCI) file the following comments in response to the Washington Utilities and Transportation Commission's October 10, 2003 Prehearing Conference Order.

1. At the October 2, 2003 Prehearing Conference, Judge Rendahl distributed a list of issues raised by the parties in their May 2003 comments. The Prehearing Conference Order asks the parties to file additional comments identifying the issues that are currently under review by or could be addressed by the Long Term PID Administration (LTPA) collaborative, issues that are unique to Washington State and any new issues the Commission should consider in the first six-month review period. These comments will address some of the issues raised.

- 2. **Add modified PIDs into QPAP that are agreed to in LTPA, i.e., PO-20, OP-5 (Qwest, AT&T, Eschelon – including partially agreed upon PIDs)**

OP-5 – MCI agrees that the revised OP-5 measure that the LTPA has now agreed upon needs to be included in the Washington Performance Assurance Plan (PAP). Reporting and PAP payments should be based on this revised PID. MCI understood Qwest to represent during the Pre-hearing Conference that it intends to file the revised OP-5 in this proceeding. MCI believes that the parties have resolved this issue and that the Commission should immediately incorporate OP-5 into the Washington PAP.

PO-20 – Parties are still negotiating this measure via the *ad hoc* LTPA process. MCI believes that the parties should continue efforts to refine this measure via the LTPA process. However, once agreement is reached, Qwest should be required to file the new PID with the Commission for immediate addition to the Washington PAP. In addition, if agreement cannot be reached within a reasonable period of time, any party should be permitted to bring the issue to the Commission for resolution on an expedited basis.

3. Include line splitting and line-sharing products in relevant PIDs, e.g., OP-5 and PO-20 (Covad)

Starting in May of this year, MCI began to order Qwest's Line Splitting product. Currently, the PIDs and the Washington PAP do not include product reporting and PAP payments for missed performance related to Line Splitting. When the subject of including Line Splitting as a product category in the PID was addressed in the *ad hoc*

LTPA meeting, Qwest took the position that it was premature to discuss until after the FCC's Triennial Review Order (TRO) was issued. The TRO has now been issued and it has made clear that Line Splitting is a critical service offering. Thus, Line Splitting performance needs to be adequately measured.

The Colorado and Minnesota PAPs both currently include Line Splitting/Line Sharing on a combined basis for the following measures:

OP-3 (A,B,C), OP-4 (A,B,C), OP-6 (A-1,2,3 and B-1,2,3), MR-3 (A,B,C), MR-6 (A,B,C), MR-7 (A,B,C), and MR-8.

While payments are made on the basis of combined results for Line Splitting/Line Sharing, the Colorado Commission required Qwest to begin to report Line Splitting performance as a separate product category for performance purposes. Colorado also included OP-5 New Service Quality to include Line Splitting as a separate product category for performance purposes.

This is an issue that may now be addressed again in LTPA, however, MCI is concerned that the LTPA may not address the issue as quickly as it is needed. To date, it is MCI's understanding that the contract with the LTPA administrator has yet to be finalized. In addition, a backlog of issues exists to be addressed in the LTPA once the process is officially underway. This includes finalization of PO-20 Manual Service Order Accuracy, discussion of Qwest's proposed BI-5 Billing Claims Processing, and the

development of a Line Loss measure. Because of the likely delay in addressing this issue in the LTPA process, MCI asks the Commission to address the Line Sharing and Line Splitting PIDs in this 6-month review process.

Given the importance of Line Splitting as a product offering, MCI also believes that Qwest should not only report Line Sharing and Line Splitting as separate product categories, as has been done in Colorado and Minnesota, but payments should be made separately. This includes the measures OP-3, OP-4, OP-6, MR-3, MR-6, MR-7, and MR-8. Standards for Line Sharing and Line Splitting need to be established under OP-6, OP-5 and PO-5.

In sum, MCI believes that the Commission should address the following in the 6-month review process:

- Order Qwest to include the agreed upon OP-5 in the Washington PAP;
- Provide a forum for the parties to bring disputes with PO-20 to the Commission on an expedited basis;
- Conduct the necessary proceedings to include Line Sharing and Line Splitting PIDs in the performance and payment provisions of the Washington PAP.

Dated this 17th day of October 2003.

MCI

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