Qwest

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STATE OF WASH. UTIL. AND TRANSP. COMMISSION



August 22, 2003

Ms. Carole Washburn, Executive Secretary Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive S.W. P.O. Box 47250 Olympia, Washington 98504-7250

Attention: Glenn Blackmon and Erin Hannan

RE: Docket UT-030704

Qwest's Petition for Waiver and Alternative Method of Reporting

Dear Ms. Washburn:

On May 14, 2003, Qwest Corporation filed a petition for permanent waiver of certain provisions of WAC 480-120-439(4). In addition, under WAC 480-120-439(12), Qwest petitioned for an alternate method of reporting of service quality performance measurements detailed in WAC 480-120-439(4).

Qwest hereby amends its original petition in this docket. Qwest seeks an order from the Commission allowing Qwest to continue providing monthly data based on completed orders and orders held due to a lack of available facilities. In addition, Qwest seeks permission to begin filing a quarterly pending order report based on the data generated for the OP-15A diagnostic performance measurement (Docket UT-030388, Qwest's Long-Term PID Administration and QPAP Review) as a proxy for the orders taken requirement in WAC 480-120-439(4)(a) and (b). The quarterly pending order report will include total retail orders by central office completed for the quarter, up to the initial five access lines, total pending orders the Company was not able to complete by central office, the average age of pending orders in each central office and the number of retail inward line orders pending more than 90 and 180 days beyond the original due date as of the date reported. Qwest seeks permission to begin submitting this quarterly pending order report beginning with the required first quarter 2004 report. This additional time is requested to allow for development of the necessary processes and programs needed to generate the quarterly report.

Sincerely,

Lisa A. Anderl LAA/llw

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