

**Qwest**  
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**Elizabeth M. Weber**  
Senior Paralegal  
Law Department



Via Messenger

July 22, 2003

Ms. Carole J. Washburn, Secretary  
Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Dr. S.W.  
P.O. Box 47250  
Olympia, WA 98504-7254

RECEIVED  
RECORDS MANAGEMENT  
03 JUL 22 PM 12:50  
STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

Re: Docket No. UT-990313  
Submission of Agreement between Qwest Corporation and Focal  
Communications Corporation of Washington

Dear Ms. Washburn:

Pursuant to Section 252(e)(2) of the Telecommunications Act of 1996, and in accordance with the Interpretive and Policy Statement issued on June 28, 1996 in Docket No. UT-960269, Qwest hereby submits three copies of the enclosed negotiated agreements between Qwest Corporation ("Qwest") and Focal Communications Corporation of Washington ("Focal"): 1) Custom Local Area Signaling Services ("CLASS") Network Interconnection Agreement dated June 24, 1999; 2) Internetwork Calling Name Delivery Service Agreement ("ICNAM Agreement") dated February 8, 2000; and 3) Transient Interim Signaling Capability Service Agreement dated February 8, 2000. Please note that original signed agreements are not available for filing nor do we have electronic copies of these agreements.

These agreements reflect standard form contracts containing provisions that are, and have been, available to all competitive local exchange carriers (CLECs) through other approved interconnection agreements, Qwest's SGAT, or through offers made by posting the contract forms on Qwest's wholesale website. Qwest believes that, under the FCC's October 2002 Declaratory Ruling regarding the scope of Section 252, these agreements do not require filing with, and approval by, the Commission.<sup>1</sup> However, Qwest has no objection to filing these form agreements under Section 252(e), and is hereby doing so out of an abundance of caution to make certain that it is in compliance with any possible filing obligations.

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<sup>1</sup> See *In the Matter of Qwest Communications International Inc. Petition for Declaratory Ruling on the Scope of the Duty to File and Obtain Prior Approval of Negotiated Contractual Arrangements under Section 252(a)(1)*, WC Docket No. 02-89, Rel. October 4, 2002, paras. 9 (information made generally available on ILEC's web site need not be filed under Section 252), and 13 (order and contract forms to obtain services are not new interconnection agreements).

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The enclosed agreements do not discriminate against non-party carriers. They are consistent with the public interest, convenience, and necessity. They are also consistent with applicable state law requirements, including Commission orders regarding interconnection issues.

The Order on Arbitration Procedure requests that a proposed order accompany the filing. Qwest requests a waiver of that requirement, and is not providing one with this filing, as the Commission has, in the past, used its own format for Orders. If this is not satisfactory to the Commission, please contact me and I will forward a proposed order immediately.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth M. Weber". The signature is written in a cursive, flowing style.

Elizabeth M. Weber

Enclosures

cc: Todd Lundy/Marjorie Herlth (without enclosures)  
Dave Tatak at Focal Communications (without enclosures)  
Director – Regulatory Affairs at Focal Communications (without enclosures)