

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Six Month Review of
Qwest Corporation's Performance
Assurance Plan

DOCKET NO. UT-033020

COMMISSION STAFF'S
RESPONSIVE COMMENTS

1 Staff provides the following comments in response to comments filed by other parties to this docket on October 17, 2003:

2 Staff agrees with the CLECs that some issues should be considered in the first six-month review. First, since Qwest has already submitted OP-5 as a PID for inclusion in the SGAT, the time is ripe to assign tier designations and payment levels for inclusion in the QPAP. In addition, since PO-20 is nearing conclusion, if the Commission decides to take up the issue of tier designations and payment levels for OP-5, Staff believes that some efficiency could be gained by also setting the tier designations and payment levels for PO-20.

3 Staff partially agrees with Covad's and WorldCom's comments regarding Line Splitting. Staff believes that this item should be included as a diagnostic in the QPAP. This will help to prepare for the transition from line sharing to line splitting, as required by the FCC's Triennial Review Order (TRO). If Qwest is willing to delay the grandfathering of line sharing, then the line splitting/line sharing issue could be delayed until January.

4 With respect to the issue of including EELs in the QPAP, Staff agrees with Eschelon's proposal to have the Commission consider adopting the Colorado standards that included in the Colorado PAP (CPAP) Ex. K.

5 Finally, Staff recommends that if any changes are considered in this first six-month review, Qwest's request to review PO-2 should also be included.

DATED this 27th day of October, 2003.

CHRISTINE O. GREGOIRE
Attorney General

GREGORY J. TRAUTMAN
Assistant Attorney General
Counsel for Commission Staff
(360) 664-1187