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**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Implementation of the  
Federal Communications Commission's  
Triennial Review Order

Docket No. UT-033025

**SUPPLEMENTAL COMMENTS  
OF QWEST CORPORATION**

Qwest Corporation ("Qwest") hereby submits these supplemental comments in response to the Notice Inviting Comments Concerning Process for Implementing FCC Triennial Review Order (Notice) issued August 22, 2003. In the Notice, the Commission seeks comment on procedural issues relating to the Federal Communications Commission's ("FCC") Triennial Review Order ("Order").

In the Notice, the Commission posed several questions relating to the issues it may need to address as a result of the Order. Qwest filed comments in response to the Notice on September 5, 2003. In those comments Qwest stated that it was in the process of preparing a set of standardized data requests that it would propose the Commission use in this proceeding. Qwest has completed that initial set of proposed data requests and attaches them to these Supplemental Comments. Qwest is continuing to analyze the FCC Order and may suggest additional or different data requests as that analysis progresses.

It is essential that all telecommunications providers (CLECs, ILECs, IXCs, cable providers, wholesale providers, VoIP providers and wireless providers included) in Washington provide this information because they are in possession of much of the factual information identified by the FCC as

1 relevant for state Commission consideration in determining if CLECs are impaired without access to  
2 specific UNEs. Pursuant to the Commission's investigatory powers, responses to these data requests  
3 should be mandatory and should require CLECs, cable providers and wireless providers to provide the  
4 factual information necessary to address the impairment issue, the alternatives to unbundled ILEC  
5 facilities, and other relevant factors to be considered by the Commission when making its decisions. To  
6 ensure that it promptly receives the information it needs, the Commission should explicitly state in any  
7 order or orders issued by the Commission that the responses to the questions are due within 10 business  
8 days and that the responses must be full and complete.

9 DATED this 11th day of September, 2003.

10 QWEST

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