

Qwest

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**VIA FAX AND
U.S. MAIL**

April 18, 2003

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

Re: Clarification to Qwest's Petition for Temporary Waiver
Docket No. UT-030459

Dear Ms. Washburn:

Qwest is writing to modify the request for waiver submitted in Docket No. UT-030459. In its petition in that docket, Qwest asked for an extension of time for various reporting deadlines due to the current unavailability of audited financial results. However, certain subsets of the reporting requirements for which the extension was requested do not involve financial information, and Qwest will be able to file those parts of the reports within the established deadline.

Qwest hereby clarifies that as to WAC 480-146-360, it will be able to comply with subsection (2), subsections (3)(c), (3)(d), (3)(e), and (3)(f). Thus, the requested waiver is only as to WAC 480-146-360(3)(a), (b), and (g). Qwest also clarifies that it will be able to file the Regulatory Fee Report that accompanies its regulatory fee.

Qwest clarifies that it continues to seek a waiver of the reporting deadline established in WAC 480-120-031(4) for the Annual Report because it will not be able to prepare its Annual Report to the FCC by that time, for reasons stated in its petition. That rule requires Qwest, as a Class A, Tier 1 telecommunications company, to use the FCC form for filing. Qwest also continues to seek a waiver of the deadline for filing the supplemental information required in subsection (9) of the rule, as stated in its petition.

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However, there is one section of Qwest's Annual Report filing that does not consist of financial information – this is the ARMIS operating data information, the ARMIS 48-03 Report. Qwest could file that information by May 1, 2003 if necessary.

Finally, Qwest would like to clarify one additional point. Staff has raised the question of whether Qwest is intending to refile its annual reports for 2000 and 2001, based on the audited financial information. Qwest is willing to do so, but would prefer to wait to see if the audited, restated financial information results in material changes to the annual report information, and at that point will discuss with Staff whether those changes necessitate refiling.

Sincerely,

Lisa A. Anderl