

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
SUPPLEMENTAL RESPONSE TO DATA REQUEST

DATE PREPARED: May 4, 2004
CASE NO.: UT-991358
REQUESTER: Qwest

WITNESS: Glenn Blackmon
RESPONDER: Glenn Blackmon
TELEPHONE: (360) 664-1112

REQUEST NO. 144:

Regarding paragraph 2 of the Statement of Commission Staff dated April 14, 2004, please provide all data, workpapers, and/or analyses that support the statement that the “program [SQPP] has contributed to the public interest by improving the quality of Qwest’s retail service.” Specifically, Qwest seeks any information that shows an independent direct correlation (i.e., cause and effect) between the SQPP and service quality improvements in the relevant areas measured under the program.

RESPONSE:

Staff does not have any documents responsive to this request.

SUPPLEMENTAL RESPONSE:

Staff does not have any documents directly responsive to this request. The statement that the SQPP has contributed to the public interest by improving the quality of Qwest’s retail service is based on the Staff’s general and ongoing oversight of Qwest’s overall operation and management. This includes statements made by employees of Qwest and U S WEST at the time the SQPP was agreed to by the companies and approved by the WUTC, observation of the company’s activities following implementation of the SQPP, statements made by company employees over time to the effect that the SQPP reflected the new owner’s commitment to resolving the chronic service problems of U S WEST, and statements made by Richard C. Notebaert at an August 22, 2002 meeting with WUTC staff in Olympia. Staff has not asserted an “independent direct correlation” between the SQPP and Qwest’s performance, and such correlation is not necessary for a “cause and effect” relationship to exist.