

Docket No. UT-003022  
Exhibit MES-21  
May 16, 2001

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# **Conducting Business with Qwest Communications Corporation**

## **Section 272 Compliance for Qwest Corporation Wholesale Employees**

# Employee Obligations

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## Employee Obligations

- Please ensure that you have first read the 272 overview package, Conducting Business after Long Distance Re-Entry, found at:  
<http://theq.qwest.net/Departments/legal/training/272training.pdf>

# What does all this mean to me as a Qwest Corporation Wholesale employee?



- Qwest Corporation (QC) is prohibited from discriminating between Qwest Communications Corporation (QCC) and any other entity in the provision or procurement of goods, services, facilities, and information, or in the establishment of standards. With the exception of joint marketing activities, all permitted services provided to QCC must be made available to any other non-Qwest entity under the same terms, conditions and price as provided to QCC.
  - When QCC identifies a need for products, services and information from QC, QCC must submit that request via a formal review process to ensure compliance with the nondiscrimination obligations
  - When other carriers request goods, services, facilities, or information from QC, those requests must be submitted via another review process to determine if similar requests have been granted to QCC. If so, these same goods, services, facilities, and information must be made available to other carriers under the same terms and conditions.

# Qwest Communications

## Corporation Request Process



1. QCC will complete a "Qwest Communications Corporation Request for Affiliate Provided Products/Services/Information" form detailing their business needs. This form can be found at <http://theq.qwest.net/departments/legal/training/requestforservices.doc>
2. Any request for standard tariff offerings will continue to go through the QC Wholesale Carrier Account Team for QCC.
3. QCC will submit the form to their QC Wholesale Senior Account Manager for review and consideration.
  - if the service is not offered by QC - QCC will contact the party directly.
  - if the request is for a service currently offered under the Master Services Agreement the Senior Account Manager will forward the request to the Business Unit Affiliate Manager to prepare a work order.

# Qwest Communications Corporation Request Process

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4. The form is forwarded to the Compliance Team. If this is a new request, the Compliance Team will discuss the request with Legal and the associated business unit to determine the risks to the corporation and the business units willingness to provide the product/service/information to QCC and if necessary, to others, if asked.
5. After a determination is made, the QC, Wholesale Senior Account Manager is notified of the outcome of the request.
6. The Senior Account Manager notifies QCC of the “yes” or “no” answer.
  - if the answer is “no” - QCC can appeal the decision to QC officer level.
  - if the answer is “yes” - the QCC Senior Account Manager sends the request to FCC Regulatory Accounting at Qwest.

# Qwest Communications Corporation Request Process

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7. FCC Regulatory Accounting will check to see if an existing Master Services Agreement exhibit covers this new request.
  - if it does, the QC, Wholesale Senior Account Manager forwards the request to the Business Unit Affiliate Manager (BUAM) to prepare a work order.
  - if it is not covered under an existing Master Services Agreement, the Agreement is amended and approved by QC and QCC. In addition, a new work order is prepared, priced, and approved.
8. New work orders must be approved before the service/product requested can commence.
9. The approved documents (work order/Master Service Agreement Amendment) must be posted on the Internet within 10 days.

# Requests Made by Other Interexchange Carriers

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If the Wholesale Carrier Account Team receives a request for non-standard goods, services, facilities or information (other than FCC 5 products) from other interexchange carriers, the Account Manager must:

1. Forward the request to FCC Regulatory Accounting.
2. FCC Regulatory Accounting will verify if the service is being offered to QCC.
3. If it is, FCC Regulatory Accounting will contact the business unit offering the service.
4. The business unit will work out the details of the service with the interexchange carrier.

# Requests Made by Other Interexchange Carriers

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5. An agreement is drawn up between QC and the interexchange carrier.
6. The business unit will forward the agreement to FCC Regulatory Accounting who verifies the pricing is consistent with the QCC terms.
7. FCC Regulatory Accounting will notify the business unit to proceed with the service.
8. The business unit will begin to provide the service.
9. The services are billed to the interexchange carrier via the Billing and Accounts Receivable Tracking (BART) system.



# Where can I go for more information?

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- FCC/Regulatory Compliance Manager - Debi Adams, 503 242-4617
- Send email questions to “ask272@qwest.com”
- Corporate Compliance Advice Line - 1-800 333-8938
- Carrier Wholesale Organization – [www.qwest.com/wholesale](http://www.qwest.com/wholesale)
- Qwest Corporation Effective Tariffs –  
<http://tariffs.uswest.com:8000/iiop/WAlmap?objectid=0-2826>
- Section 272 Affiliate Transactions Web site  
[www.qwest.com/about/policy/docs/long\\_distance.html](http://www.qwest.com/about/policy/docs/long_distance.html)