

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Second Six-Month)
Review of Qwest Corporation's) DOCKET NO. UT-043007
Performance Assurance Plan)
) INITIAL ISSUES LIST
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.....)

COMES NOW Qwest Corporation (“Qwest”) and submits the following list of issues pursuant to Order No. 1 and Order No. 4, after consultation with all parties.

1. Issues from the LTPA as to which an impasse has been reached at the LTPA.
 - (a) Line Splitting: what standard should be used for this product for the MR-3, 4, 6 and 8 and the OP-5 PIDs?
 - (b) Loop Splitting: should this product be added to the PO-5, OP-3 through 6, OP-15, MR-3, MR-4, MR-6 and 8 PIDs, and if so, what standard should apply?
 - (c) XDSL-i products: how should these products be added to the PIDs and what standard should apply?
 - (d) Should UNE-P Centrex 21 be included in PO-2 and if so, what standards should apply?
2. Issues from LTPA as to which agreement was reached and which may require some modification to the QPAP for implementation.

ISSUES LIST

- (a) PO-20: To what tier should this new PID be assigned, and should Qwest be allowed a low volume exception and a burn-in period for implementation?
 - (b) What changes if any should be made to modify the QPAP for Qwest's May 6, 2004 filing that changed Exhibit B to reflect LTPA agreements?
3. Issues identified by parties to this proceeding that were not considered in the LTPA process. The party suggesting the issue is identified.
- (a) Should Qwest be required to publish its aggregate payments under QPAP?
(Covad)
 - (b) Should a low-volume exception to QPAP payment requirements exist for the line splitting product as measured by the OP-3 and 4 PIDs? (Qwest)
 - (c) Should Line Sharing be subject to a sunset procedure in Exhibit K? (Qwest)
 - (d) Should Dark Fiber be eliminated from Exhibit K? (Qwest)

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