

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

Docket No. 02M-259T

**IN THE MATTER OF QWEST CORPORATION'S COLORADO PERFORMANCE
ASSURANCE PLAN**

QWEST CORPORATION'S REPLY COMMENTS

Qwest Corporation ("Qwest") submits its reply to the Comments filed by WorldCom, Inc. ("MCI") on behalf of its regulated subsidiaries on October 17, 2003, as permitted in Staff's request for comments at the October 8, 2003 meeting on Staff's second six-month review of the Colorado Performance Assurance Plan ("CPAP"). Qwest's comments filed on October 17, 2003, address the issues contained in MCI's October 17th Comments except for the CLEC-specific Line Splitting reporting issue; therefore, Qwest limits its comments to this issue only in reply to MCI's Comments.

Line Splitting Reporting

MCI comments that, although Qwest did report line splitting as a separate product category from line sharing in its aggregate performance results for August 2003, which were filed on September 30, 2003, it did not appear that Qwest was reporting line splitting as a separate category in its CLEC specific performance results. As MCI commented, it raised the issue in the October 8th meeting and Dean Buhler subsequently advised MCI by e-mail that Qwest was investigating and would advise further once the investigation was completed. On or about October 21, 2003, Dean Buhler telephoned Chad Warner of MCI and advised that Qwest had identified a problem which was being corrected and that line splitting would be reported as a

separate product category in the CLEC specific performance results reports for September 2003, and would also reflect August 2003 historical results, if any. The problem has been corrected. CLEC specific performance results reports for September performance reflect line splitting as a separate product category from line sharing for PIDs OP-3, OP-4, OP-5, OP-6, MR-3, MR-6, MR-7 and MR-8, as well as reflect August historical data and the issue should be considered closed.

Dated this 4th day of November, 2003.