

Qwest

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Maura E. Peterson

Paralegal
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VIA E-MAIL AND WEB PORTAL

May 24, 2007

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, WA 98504-7254

Re: Docket No. UT-063055
Request for Approval of Amendment to the Interconnection Agreement
between Qwest Corporation and Verizon Business Network Services, Inc.
(successor in interest to MCI Worldcom Network Services, Inc.) and its
affiliates MCI Communications Services, Inc. and MCImetro Access
Transmission Services, LLC

Dear Ms. Washburn:

In accordance with WAC 480-07-640 and Section 252 of the Telecommunications Act, please find enclosed an original and two (2) copies of the Business Escalation Agreement to the Interconnection Agreement between Qwest Services Corporation and its affiliates, including Qwest Corporation ("Qwest") on one hand, and Verizon Business Network Services, Inc., and its affiliates on the other.

The purpose of this Agreement is, generally, to improve the business-to-business relations between the parties and agree to resolve business issues through standard escalation processes.

Please note that the Agreement addresses a broad array of issues that would be subject to its escalation procedures. Thus, the language of Section 4 in the Agreement, which states that interconnection agreement "disputes" shall still be governed by the dispute resolution terms of the existing interconnection agreement, addresses not all of the matters that could arise between the parties that are within the scope of the Agreement. Further, the parties' business-to-business relationship pertains to Section 251 services as well as other services. For these reasons, Qwest believes that the Agreement reflects changes and additions to its existing interconnection agreement with Verizon and it is appropriate to file this Agreement pursuant to Section 252 filing requirements.

Qwest has also enclosed a Request for Approval form, completed per the informal request of Commission Staff on May 12, 2004.

The enclosed Amendment does not discriminate against non-party carriers. It is consistent with state and federal law, and is in the public interest.

Qwest respectfully requests that the Commission approve this Amendment expeditiously.

Sincerely,

Maura E. Peterson

MEP:mep

Enclosures

cc: Margie Herlth (without enclosure)
Michael Beach (without enclosure)

CERTIFICATE OF SERVICE

Docket No. UT-063055

I hereby certify that I have this day served this cover letter without the enclosed amendment upon all persons listed below who are parties of record in this proceeding, by United States Postal Service first class mail in accordance with WAC 480-07-150.

MCImetro Vice President, Carrier Management Attn: Michael Beach 6415-6455 Business Center Drive Highlands Ranch, CO 80130	MCImetro Chief Network Counsel Attn: Robert A. Peterson 1133 19th St. Northwest Washington, DC 20036
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Dated at Seattle, Washington this ____ day of May 2007.

Maura E. Peterson