

Qwest
1600 7th Avenue, Room 3206
Seattle, Washington 98191
Phone: (206) 398-2507
Facsimile (206) 343-4040

Lisa A. Anderl
Associate General Counsel
Regulatory Law

*Via E-Mail and
Overnight Mail*

September 5, 2003

Ms. Carole Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Attention: Glenn Blackmon and Erin Hannan

RE: Docket UT-030704
Qwest's Petition for Waiver and Alternative Method of Reporting

Dear Ms. Washburn:

On May 14, 2003, Qwest Corporation filed a petition for permanent waiver of certain provisions of WAC 480-120-439(4). In addition, under WAC 480-120-439(12), Qwest petitioned for an alternate method of reporting of service quality performance measurements detailed in WAC 480-120-439(4).

On August 22, 2003, Qwest amended its original petition seeking an order from the Commission allowing Qwest to continue providing monthly data based on completed orders and orders held due to a lack of available facilities. Qwest seeks permission to begin filing a quarterly pending order report, generated for the OP-15A diagnostic (Docket UT-030388, Qwest's Long-Term PID Administration and QPAP Review) as a proxy for the orders taken requirement in WAC 480-120-439(4)(a) and (b). The quarterly pending order report will include total retail orders by central office completed for the quarter, up to the initial five access lines, total pending orders Qwest was not able to complete by central office, the average age of pending orders in each central office and the number of retail inward line orders pending more than 90 and 180 days beyond the original due date as of the date reported. Qwest seeks permission to begin filing this quarterly pending order report beginning with the required first quarter 2004 report.

Ms. Carole Washburn

September 5, 2003

Page 2

Qwest believes that the proposed method of alternately reporting is an accurate measure of Qwest's retail service quality performance, as intended in WAC 480-120-439(4). Further, should the Commission grant this petition, Qwest believes that neither the Commission nor other parties' ability to enforce compliance with stated performance standards will be impaired by use of these alternate measures of reporting.

Sincerely,

Lisa A. Anderl

LAA/llw