

**Qwest**  
1600 7th Avenue, Room 3206  
Seattle, Washington 98191  
(206) 398-2504  
Facsimile (206) 343-4040

**Elizabeth M. Weber**  
Senior Paralegal  
Law Department



*Via Messenger*

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COMMISSION

July 22, 2003

Ms. Carole J. Washburn, 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-980380  
Submission of Agreement between Qwest Corporation and Integra Telecom of  
Washington, Inc.

Dear Ms. Washburn:

Pursuant to Section 252(e)(2) of the Telecommunications Act of 1996, and in accordance with the Interpretive and Policy Statement issued on June 28, 1996 in Docket No. UT-960269, Qwest hereby submits three copies of the enclosed negotiated Agreement for CMDS Hosting and Message Distribution for CLECs dated February 1, 2001 between Qwest Corporation (“Qwest”) and Integra Telecom of Washington, Inc. Please note that the original signed agreement is not available for filing nor do we have an electronic copies of this agreement.

This agreement reflects standard form contracts containing provisions that are, and have been, available to all competitive local exchange carriers (CLECs) through other approved interconnection agreements, Qwest’s SGAT, or through offers made by posting the contract forms on Qwest’s wholesale website. Qwest believes that, under the FCC’s October 2002 Declaratory Ruling regarding the scope of Section 252, this agreement does not require filing with, and approval by, the Commission.<sup>1</sup> However, Qwest has no objection to filing this form agreement under Section 252(e), and is hereby doing so out of an abundance of caution to make certain that it is in compliance with any possible filing obligations.

The enclosed agreement does not discriminate against non-party carriers. It is consistent with the public interest, convenience, and necessity. It is also consistent with applicable state law requirements, including Commission orders regarding interconnection issues.

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<sup>1</sup> See *In the Matter of Qwest Communications International Inc. Petition for Declaratory Ruling on the Scope of the Duty to File and Obtain Prior Approval of Negotiated Contractual Arrangements under Section 252(a)(1)*, WC Docket No. 02-89, Rel. October 4, 2002, paras. 9 (information made generally available on ILEC’s web site need not be filed under Section 252), and 13 (order and contract forms to obtain services are not new interconnection agreements).

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The Order on Arbitration Procedure requests that a proposed order accompany the filing. Qwest requests a waiver of that requirement, and is not providing one with this filing, as the Commission has, in the past, used its own format for Orders. If this is not satisfactory to the Commission, please contact me and I will forward a proposed order immediately.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth M. Weber".

Elizabeth M. Weber

Enclosure

cc: Todd Lundy/Marjorie Herlth (without enclosure)  
Director of Billing at Integra Telecom of Washington (without enclosure)  
Vice President and General Counsel at Integra Telecom of Washington (without enclosure)