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**Lisa A. Anderl**  
Senior Attorney  
Policy and Law Department

January 11, 2001

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UTILITY AND TRANSPORTATION  
COMMISSION

Via UPS

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-003006  
Request for Approval of Amendment No. 1 to the Interconnection  
Agreement between Qwest Corporation and Sprint Communications

Dear Ms. Washburn:

In accordance with the Order on Arbitration Procedure in Docket No. UT-960269, please find enclosed an original and five (5) copies of Amendment No. 1 to the Interconnection Agreement between Qwest Corporation and Sprint Communications. Also enclosed are an original and five (5) copies of a Request for Approval of Amendment No. 1 to the Interconnection Agreement.

The Order on Arbitration Procedure also 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.

If you have any questions or need any further information, please do not hesitate to contact me at the number listed above, or my paralegal, Elizabeth M. Weber at (206) 398-2504.

Sincerely,

Lisa A. Anderl

Enclosures

cc: Debi Hartl (with pleading, without amendment)  
Ken Ross at Sprint (with pleading, without amendment)

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COMMUNICATIONS DIVISION

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Request for Approval of	)	
Amendment No. 1 to the Interconnection	)	Docket No. UT-003006
Agreement Between Qwest Corporation and	)	
Sprint Communications	)	REQUEST FOR APPROVAL OF
	)	AMENDMENT NO. 1 TO THE
	)	INTERCONNECTION AGREEMENT
	)	

**I. INTRODUCTION**

Pursuant to Section III of the Interpretive and Policy Statement Regarding Mediation, Arbitration, and Approval of Agreements under the Telecommunications Act of 1996 ("Interpretive and Policy Statement") issued by this Commission in Docket No. UT-960269, Qwest Corporation ("Qwest") and Sprint Communications ("Sprint") hereby submit for approval by the Washington Utilities and Transportation Commission ("Commission" or "WUTC") the attached Amendment No. 1 to the Interconnection Agreement executed on January 2 and 4, 2001 (the "Amendment"). This amendment supplements the original interconnection agreement between Sprint and Qwest which was approved by the Commission on August 28, 2000 in this same docket. This amendment adds terms, conditions and rates for complex firm order

1 confirmation.

2 The original Agreement set forth terms, conditions and prices under which Qwest agreed  
3 to provide services for resale and certain Unbundled Network Elements, Ancillary Functions and  
4 additional features in each LATA in which both Qwest and Sprint operate within the state of  
5 Washington. The Agreement also had terms, conditions and prices under which the parties  
6 agreed to provide interconnection and reciprocal compensation for the exchange of local traffic  
7 for the purpose of offering telecommunications services. The Agreement stated that the pricing  
8 for these services is subject to the outcome of the Commission's determination in the Generic  
9 Pricing Docket, UT-960369, et al.

10 This Amendment is submitted for approval pursuant to Section 252(e) of the  
11 Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the "Act")  
12 and the requirements of the Commission's Interpretive and Policy Statement.

## 13 II. REASONS FOR APPROVAL

14 Section 252(e)(2) of the Act directs that a state commission may reject an Agreement  
15 reached through negotiation and/or arbitration only if the Commission finds that:

- 16 1) The Agreement (or portions thereof) discriminates against a  
17 telecommunications carrier not a party to the Agreement; or
- 18 2) The implementation of such Agreement or portion is not consistent with the  
19 public interest, convenience and necessity.

20 Qwest and Sprint respectfully submit that the Amendment provides no basis for either of  
21 these findings and thus request that the Commission approve the Amendment expeditiously.

22 First, the Amendment does not discriminate against any other telecommunications carrier. There  
23 is no finding that the terms of this Amendment are more favorable than terms provided to other

1 carriers.

2 Second, the Amendment is consistent with the public interest as identified in the pro-  
3 competitive policies of the state of Washington, the WUTC, the U.S. Congress and the Federal  
4 Communications Commission. In addition, because this Agreement does not discriminate  
5 against any other telecommunications carrier, state law policies prohibiting unreasonable  
6 discrimination are preserved by approval of this Amendment.

7 For the foregoing reasons, Qwest and Sprint submit that approval of this Amendment is  
8 warranted because it satisfies the state and federal criteria for approval.

9 **III. UNDERSTANDING AND AGREEMENT OF PARTIES**

10 With respect to the Amendment, the Parties understand and agree that this amendment  
11 adds a description, terms, and conditions for complex firm order confirmation.

12 **IV. CONCLUSION**

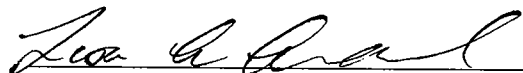
13 For the foregoing reasons, Qwest and Sprint respectfully request expeditious approval of  
14 the Amendment. Both Parties request approval earlier than the 90 day time period allowed for  
15 by the Interpretive and Policy Statement, in order to facilitate the immediate availability of  
16 additional local exchange competition between Qwest and Sprint.

17 Respectfully submitted this 11<sup>th</sup> day of January, 2001.

18 Qwest

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Lisa A. Anderl, WSBA No. 13236  
1600 - 7th Avenue, Room 3206  
Seattle, WA 98191  
(206) 345-1574

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24 REQUEST FOR APPROVAL  
OF AMENDMENT

**Amendment No. 1  
to the Interconnection Agreement between  
Qwest Corporation and  
Sprint Communications  
for the States of Arizona, Colorado, Minnesota and Washington**

This is Amendment No. 1 ("Amendment") to the Interconnection Agreement between Qwest Corporation ("Qwest"), formerly known as U S WEST Communications, Inc., a Colorado corporation, and Sprint Communications Company ("Sprint"), a Delaware Limited Partnership. Sprint and Qwest shall be known jointly as the "Parties".

**RECITALS**

WHEREAS, the Parties entered into an Interconnection Agreement that was approved by the Arizona Corporation Commission October 10, 2000; the Colorado Public Utilities Commission August 29, 2000, the Minnesota Public Utilities Commission September 7, 2000 and the Washington Utilities and Transportation Commission August 28, 2000, (the "Underlying Agreement"); and

WHEREAS, the Parties wish to amend the Agreement further under the terms and conditions contained herein.

**AGREEMENT**

NOW THEREFORE, in consideration of the mutual terms, covenants and conditions contained in this Amendment and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

**Amendment Terms**

The Agreement is hereby amended by adding terms and conditions for Complex Firm Order Confirmation ("FOC"), as set forth in Attachment 1, to this Amendment, attached hereto and incorporated herein by this reference.

**Effective Date**

This Amendment shall be deemed effective upon approval by the appropriate state Commissions; however, the Parties may agree to implement the provisions of this Amendment upon execution. To accommodate this need, Sprint must generate, if necessary, an updated Customer Questionnaire. In addition to the Questionnaire, all system updates will need to be completed by Qwest. Sprint will be notified when all system changes have been made. Actual order processing may begin once these requirements have been met.

**Further Amendments**

Except as modified herein, the provisions of the Agreement shall remain in full force and effect. Neither the Agreement nor this Amendment may be further amended or altered except by written instrument executed by an authorized representative of both Parties.

The Parties intending to be legally bound have executed this Amendment as of the dates set forth below, in multiple counterparts, each of which is deemed an original, but all of which shall constitute one and the same instrument.

**Sprint Communications Company**

W. Richard Morris  
Signature

W. Richard Morris  
Name Printed/Typed

Vice President External Affairs  
Title Local Markets

January 2, 2001  
Date

**Qwest Corporation**

Cynthia L. Humphrey  
Signature

Cynthia L. Humphrey  
Name Printed/Typed

General Manager  
Title

01/04/01  
Date

**ATTACHMENT 1****Complex Firm Order Confirmation**

Qwest will provide confirmation, via a Complex Firm Order Confirmation ("FOC") that Sprint's LSR has been received and successfully processed. The FOC will confirm the schedule of dates assigned by Qwest for the provisioning of service requested. The Complex FOC will be issued no later than seventy-two (72) hours after receipt of a complete and accurate LSR for the requested non-loaded, xDSL-I, ISDN, ADSL and DS1 unbundled Loops. If the results of the verification process show the loop to be fully functional, Qwest will provide the FOC to Sprint upon such verification. If a facility issue is identified, the standard held order process will be initiated, or a new installation interval will be provided, based on the type of work needed to provision the service; e.g., conditioning.