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BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
Chairman

WILLIAM A. MUNDELL
Commissioner

MIKE GLEASON
Commissioner

JEFF HATCH-MILLER
Commissioner

KRISTIN K. MAYES
Commissioner

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Arizona Corporation Commission
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IN THE MATTER OF QWEST
CORPORATION'S PERFORMANCE
ASSURANCE PLAN

Docket No. T-01051B-02-0666

**MCI'S COMMENTS ON QPAP
SIX MONTH REVIEW PROCESS**

MCImetro Access Transmission Services LLC ("MCImetro") submits these comments in response to the Procedural Order issued in this docket dated June 18, 2004.

1. The Scope of Such Proceeding.

MCI Response: The scope is defined in the Qwest Performance Assurance Plan ("QPAP") in Section 16.1 as follows:

16.1 Every six (6) months, Qwest, CLECs, and the Commission shall review the performance measurements to determine whether measurements should be added, deleted, or modified; whether the applicable benchmark standards should be modified or replaced by parity standards; and whether to move a classification of a measure to High, Medium, or Low or Tier-1 to Tier-2. Criteria for review of performance measurements, other than for possible reclassification, shall be whether there exists an omission or failure to capture intended performance, and whether there is duplication of another

1 measurement. The first six-month period will begin upon the FCC's
2 approval of Qwest's 271 application for the state of Arizona. Staff shall
3 seek the mutual consent of the parties to any proposed changes.
4 Notwithstanding the limitations set forth above, Qwest acknowledges that
5 the Commission reserves the right to modify the PAP including, but not
6 limited to performance measurements, penalty amounts, escalation factors,
7 audit procedures and reevaluation of confidence levels, at any time as it sees
8 fit and deems necessary upon Commission Order after notice and hearing.

6 **2. A List of Issues Which Should be Addressed in the Six Month Review.**

7
8 A. *Line Splitting: What standard should be used for this product for the*
9 *following Performance Indicator Definitions ("PIDs") MR-3, 4, 6*
10 *and 8 and the OP-5?*

11 **MCI Position:** Incorporate the LTPA facilitator's and State Staff's
12 recommendation to implement the standard of parity with "Res and Bus POTS" for line
13 splitting for the following PIDs OP-5A, MR-3, 4, 6, and 8.

14 B. *Loop Splitting: Should this product be added to the following PIDs*
15 *PO-5, OP-3, 4, 5, 6 and 15, MR-3, 4, 6, 7 and 8 and if so, what*
16 *standard should apply?*

17 **MCI Position:** Incorporate the LTPA facilitator's and State Staff's
18 recommendation to begin reporting loop splitting for the following PIDs PO-5, OP-3, 4, 5,
19 6 and 15, MR-3, 4, 6, 7 and 8 with a diagnostic standard for six-months.

20 C. *PO-20: What Tier should be assigned to this new PID?*

21 **MCI Position:** Qwest filed a revised Exhibit B to its Arizona SGAT on
22 June 24, 2004, in Docket No. T-01051B-99-0068, which among other things adds PO-20 to
23 Exhibit B. However, the treatment of the PO-20 measure in the PAP needs to be added as
24 a Tier 1 High and Tier 2 High to be consistent with the treatment of the companion
25 measure OP-5.
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D. Should Qwest be required to publish its aggregate payments under QPAP?

MCI Position: Require Qwest to make available CLEC aggregate PAP performance and payment reports at the product level (e.g., report payments for “MR-8-DS-1 capable loops” rather than payments for the measure MR-8) for the state of Arizona on Qwest’s website.

E. What changes should be made to modify the QPAP for Qwest’s May 3, 2004 SGAT revision that changed Exhibit B to reflect LTPA agreements filed in Docket No. T-01051B-99-0068?

MCI Position: Agreed upon changes to measures in Exhibit B such as the inclusion of Line Splitting should result in a complementary changes to Exhibit K for measures addressed in the QPAP.

3. How Should Proceeding be Conducted? Is a Hearing Necessary?

The LTPA process is an efficient, resource conserving and timesaving method of discussing and resolving disputes among interested parties. The members of the LTPA have been working with Qwest for over a year and a half. MCI, and other parties, have expended a great deal of resources. MCI believes that a “paper” process can be used to present the matters at issue from the LTPA to the Commission. Therefore, MCI does not believe any hearing is necessary.

4. Other Proceedings.

Washington -- pending proceeding with Initial Briefs (with supporting affidavits as necessary) due Friday July 16, 2004 and Reply Briefs (with supporting affidavits as necessary) due Friday, July 30, 2004. An Order is anticipated on or about August 13, 2004.

Colorado -- The staff has issued its Third Six-Month Review Report of the Colorado Performance Assurance Plan on June 7, 2004 in Docket No. 02M-259T. MCI

1 filed comments with Covad to that report on June 21, 2004. Qwest has asked for a
2 hearing, but no hearing has been set as of this date.

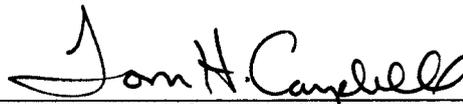
3 **5. Other Issues.**

4 **MCI Position:** None at this time.

5 AT&T and Covad have authorized MCI to state that they support and join in these
6 comments, except that Covad takes no position on 2(C).

7
8 Dated: July 7, 2004.

9 LEWIS AND ROCA

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11 By 

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23 ORIGINAL and thirteen (13) copies
24 of the foregoing filed this 7th day of
25 July, 2004, with:

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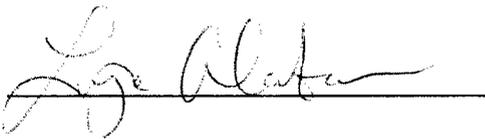
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