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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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IN THE MATTER OF QWEST CORPORATION'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996

Docket No. T-00000A-97-0238

QWEST CORPORATION'S FIFTH (1Q/04) QUARTERLY FILING OF ACTUAL CLEC EDI RESPONSE TIMES

Qwest Corporation (Qwest) hereby provides aggregated actual CLEC EDI response times for the months of January, February, and March 2004, produced in compliance with the Arizona Corporation Commission Staff's Impasse Issue #940 Resolution: Use of IRTM for PID PO-1B. In this resolution, Staff required Qwest to develop the capability to report actual CLEC Pre-Order/Order Response Times for EDI transactions at Qwest's Interactive Agent (IA) by year end 2002, and to track these results with PO-1B until the 18 and/or 24 month review, at which time a decision will be made whether to modify the PIDs to utilize EDI response times as measured at the Qwest IA.¹

On February 12, 2003, Qwest filed its Notice of Compliance Regarding CLEC Actual EDI Response Times (Notice of Compliance), confirming that Qwest had developed the required capability to report actual CLEC Pre-Order/Order response times for EDI transactions and proposing that the monthly aggregated results be reported on a quarterly basis until the 18 and/or 24 month review. Accordingly, Qwest submits this fifth quarterly filing of CLEC aggregated EDI response times. The results for each month in the first quarter of 2004 are listed below.

¹ Staff's Impasse #940 resolution: Use of IRTM for PID PO-1B at section E.

Transactions for CLECs on all Releases Compared to IRTM Transactions – January 2004								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC	IRTM	Differences
		Obs.	Time	Process	Process	CLEC	Avg.	
			(1)	Time	Time	IA	Time	
				(Inbound)	(Outbound)	(1) - (2) -	Time	
				(2)	(3)	(3)	(4)	
All CLECs	ADDRVAL	231838	5.225	1.062	0.733	3.43	3.42	0.01
(Excluded all	SERVAVAIL	0	N/A	N/A	N/A	N/A	7.87	N/A
Internal	CSR	302871	5.469	0.882	0.634	3.953	4.02	-0.067
Trading								
Partners	APPTSCHED	2580	4.513	0.548	0.168	3.797	3.52	0.277
(IRTM))	TN	6262	6.251	0.563	0.195	5.493	5.13	0.363
	FACCHECK	4765	10.074	0.677	0.156	9.241	6.15	3.091
	LOOPQUALTOOLS	2300	14.785	2.314	0.993	11.478	14.22	-2.742
	RESALELOOPQUAL	0	N/A	N/A	N/A	N/A	11.81	N/A
	CFA	25	8.587	0.399	0.13	8.058	8.73	-0.672
	MPQ	0	N/A	N/A	N/A	N/A	5.68	N/A

Transactions for CLECs on all Releases Compared to IRTM Transactions – February 2004								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC	IRTM	Differences
		Obs.	Time	Process	Process	CLEC	Avg.	
			(1)	Time	Time	IA	Time	
				(Inbound)	(Outbound)	(1) - (2) -	Time	
				(2)	(3)	(3)	(4)	
All CLECs	ADDRVAL	274778	4.989	0.85	0.484	3.655	3.4	0.255
(Excluded all	SERVAVAIL	0	N/A	N/A	N/A	N/A	8.93	N/A
Internal	CSR	324846	5.757	0.796	0.524	4.437	4.07	0.367
Trading								
Partners	APPTSCHED	2848	4.324	0.557	0.162	3.605	3.59	0.015
(IRTM))	TN	6230	6.345	0.581	0.155	5.609	5.25	0.359
	FACCHECK	4617	10.17	0.663	0.149	9.358	6.67	2.688
	LOOPQUALTOOLS	2690	13.039	1.473	0.463	11.103	10.94	0.163
	RESALELOOPQUAL	0	N/A	N/A	N/A	N/A	10.07	N/A
	CFA	6645	8.024	0.499	0.318	7.207	9	-1.793
	MPQ	0	N/A	N/A	N/A	N/A	5.51	N/A

Transactions for CLECs on all Releases Compared to IRTM Transactions – March 2004								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC	IRT	Differences
		Obs.	Time	Process	Process	CLEC	M	
			(1)	Time	Time	IA	Avg.	
				(Inbound)	(Outbound)	(1) - (2) -	Time	
				(2)	(3)	(3)	(4)	
All CLECs	ADDRVAL	289814	4.854	0.7	0.455	3.699	3.38	0.319
(Excluded all	SERVAVAIL	0	N/A	N/A	N/A	N/A	8.89	N/A
Internal Trading	CSR	388490	5.576	0.685	0.456	4.435	4.02	0.415
Partners (IRTM))	APPTSCHED	5510	3.946	0.566	0.142	3.238	3.56	-0.322
	TN	9188	6.365	0.588	0.152	5.625	5.28	0.345
	FACCHECK	6054	9.957	0.656	0.147	9.154	6.46	2.694
	LOOPQUALTOOLS	1361	12.738	2.467	1.338	8.933	10.51	-1.577
	RESALELOOPQUAL	0	N/A	N/A	N/A	N/A	8.42	N/A
	CFA	9859	7.595	0.442	0.295	6.858	8.87	-2.012
	MPQ	0	N/A	N/A	N/A	N/A	5.65	N/A

The results show aggregated CLEC actual response times with and without IA processing time. Please note that N/A stands for not applicable and indicates that no CLEC issued those types of queries during the month. As stated in the Notice of Compliance, Qwest is providing the results in this manner to allow for an accurate comparison of the results from actual transactions with results from IRTM transactions, since the processing time at the IA, as captured in actual transactions, is directly impacted by a CLEC's selection of hardware and software.

As Qwest has previously stated, the type of hardware a CLEC chooses can directly impact the transaction measurements. For example, if a CLEC uses nonstandard configurations, a slower server, or slower than normal network connections, then that CLEC's results will be much greater than those of a CLEC using more efficient hardware. Additionally, because the time period measured does not end until Qwest receives an acknowledgement from the CLEC, the response time will be longer if a CLEC's IA takes longer to send the acknowledgement. Further, it is possible for a CLEC to structure

1 certain queries in a way that increases the processing time, e.g., by including multiple
2 lines in a single ADSL Loop Qualification query.

3 Qwest has excluded response times from IMA's internal production load, release
4 and pre-start testing. These transactions are similar to Qwest's internally generated IRTM
5 transactions, except they are used to verify a major release, check systems performance
6 and load levels, or pretest all systems during system maintenance windows before
7 excepting co provider transactions. Since these transactions are easily identified due to the
8 unique co provider identifiers used, and are not CLEC transactions they are not included
9 in the quarterly measurements. Any active production co provider sending data during a
10 production load test would still have all their data measurements reported.

11 In conclusion, Qwest has complied with the Staff's Impasse Resolution to develop
12 the capability to measure actual EDI transactions by year-end 2002.

13 Qwest now provides with this filing the results for the first quarter of 2004.

14 RESPECTFULLY SUBMITTED this 30th day of April, 2004.

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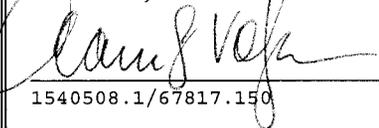
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