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2004 JUL 26 P 3: 38
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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 SIXTH (2Q/04) QUARTERLY FILING
OF ACTUAL CLEC EDI RESPONSE TIMES**

Qwest Corporation (Qwest) hereby provides aggregated actual CLEC EDI response times for the months of April, May, and June 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

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

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 sixth quarterly filing of CLEC aggregated EDI response times. The results for each month in the second quarter of 2004 are listed below.

Transactions for CLECs on all Releases Compared to IRTM Transactions - April 2004								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg - IA Process	IRTM	Differences
		Obs.	Time (1)	Process Time	Process Time	(1) - (2) - (3)	Avg.	
				(Inbound) (2)	(Outbound) (3)		Time (4)	
All CLECs	ADDRVAL	190372	4.727	0.692	0.387	3.648	2.68	0.968
(Excluded all	SERVAVAL	0	N/A	N/A	N/A	N/A	9.3	N/A
Internal Trading	CSR	250182	6.555	0.702	0.442	5.411	3.56	1.851
Partners (IRTM))	APPTSCHED	3306	3.907	0.606	0.141	3.16	3.58	-0.42
	TN	7135	4.771	0.602	0.143	4.026	4.09	-0.064
	FACCHECK	4648	10.09	0.665	0.135	9.29	6.41	2.88
	LOOPQUALTOOLS	712	7.768	0.765	0.267	6.736	10.48	-3.744
	RESALELOOPQUAL	0	N/A	N/A	N/A	N/A	9.09	N/A
	CFA	4602	7.658	0.458	0.301	6.899	8.98	-2.081
	MPQ	0	N/A	N/A	N/A	N/A	5.05	N/A

Transactions for CLECs on all Releases Compared to IRTM Transactions - May 2004								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg - IA Process	IRTM	Differences
		Obs.	Time (1)	Process Time	Process Time	(1) - (2) - (3)	Avg.	
				(Inbound) (2)	(Outbound) (3)		Time (4)	
All CLECs	ADDRVAL	253307	4.951	0.789	0.488	3.674	1.87	1.804
(Excluded all	SERVAVAL	0	N/A	N/A	N/A	N/A	7.74	N/A
Internal Trading	CSR	309623	6.613	0.848	0.528	5.237	3.07	2.167
Partners (IRTM))	APPTSCHED	6111	3.889	0.595	0.137	3.157	3.54	-0.383
	TN	12175	4.709	0.598	0.14	3.971	4	-0.029
	FACCHECK	7683	10.991	0.642	0.134	10.215	7.02	3.195
	LOOPQUALTOOLS	1348	13.224	0.838	0.237	12.149	10.61	1.539
	RESALELOOPQUAL	0	N/A	N/A	N/A	N/A	9.13	N/A
	CFA	4513	7.943	0.479	0.307	7.157	9.41	-2.253
	MPQ	0	N/A	N/A	N/A	N/A	5.19	N/A

Transactions for CLECs on all Releases Compared to IRTM Transactions - June 2004								
CLEC	TRANS_TYPE	CLEC	Avg.	Avg. IA	Avg. IA	CLEC Avg - IA Process	IRTM	Differences
		Obs.	Time (1)	Process Time (Inbound) (2)	Process Time (Outbound) (3)	(1) - (2) - (3)	Avg. Time (4)	
All CLECs	ADDRVAL	248161	5.73	1.403	0.62	3.707	1.84	1.867
(Excluded all	SERVAVAL	0	N/A	N/A	N/A	N/A	6.71	N/A
Internal Trading	CSR	295490	7.335	1.268	0.667	5.4	2.91	2.49
Partners (IRTM))	APPTSCHED	7827	4.903	1.632	0.132	3.139	3.64	-0.501
	TN	14235	5.766	1.599	0.142	4.025	4	0.025
	FACCHECK	9255	10.579	1.724	0.125	8.73	6.23	2.5
	LOOPQUALTOOLS	1441	12.317	0.77	0.231	11.316	10.27	1.046
	RESALELOOPQUAL	0	N/A	N/A	N/A	N/A	8.75	N/A
	CFA	4397	7.983	0.439	0.293	7.251	9.63	-2.379
	MPQ	0	N/A	N/A	N/A	N/A	5.13	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 certain queries in a way that increases the processing time, *e.g.*, by including multiple lines in a single ADSL Loop Qualification query.

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

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

Qwest now provides, with this filing the results for the second quarter of 2004.

RESPECTFULLY SUBMITTED this 26th day of July, 2004.

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