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BEFORE THE ARIZONA CORPORATION COMMISSION

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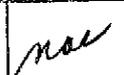
Arizona Corporation Commission

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AZ CORP COMMISSION
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IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S COMPLIANCE
WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

**QWEST CORPORATION'S COMMENTS TO THE STAFF'S FINAL REPORT
ON QWEST'S COMPLIANCE WITH CHECKLIST ITEM: NO. 6 –
UNBUNDLED LOCAL SWITCHING RELEASED OCTOBER 1, 2001**

Qwest Corporation hereby provides its comments to the Staff's Final Report on Qwest's Compliance with Checklist Item: No. 6 – Unbundled Local Switching Released October 1, 2001 (hereinafter, Report). Qwest commends Staff and the Hearing Division for their hard work in generating and issuing the Report. Qwest accepts virtually every conclusion in the Report. Qwest does, however, seek modification of one unbundled switching issue. Qwest respectfully requests that the Arizona Corporation Commission (ACC) adopt the Report with the minor changes reflected below.

DISPUTED ISSUE NO. 1: Whether Qwest must provide unbundled access to Advanced Intelligence Network ("AIN") features? (SW-1)

Qwest agrees with the Staff Recommendation that the FCC has found that Qwest is not required to provide unbundled access to its AIN products, that Qwest already has a legally binding obligation to do what is required under FCC orders in its SGAT, and that

Qwest is meeting its obligations as defined under current FCC Orders.¹ Qwest seeks clarification of paragraph 78 of the Report in which Staff encourages Qwest to undertake periodic reviews of its AIN products and features and to make a good faith concerted effort to make available as many AIN products as possible. In paragraph 77, Staff correctly found that Qwest is not required to make its AIN products available. Since Qwest is not required to make its AIN products available, Qwest is not clear what the good faith effort to make available as many AIN products would involve and what potential CLEC benefit would be provided from this effort. Given that Qwest has no legal obligations to provide such features, Qwest recommends that this portion of ¶ 77 be dropped from the Report. In the second sentence of paragraph 78, Staff “recommend[s] that Qwest include language in its SGAT to reflect this commitment.” As stated above, Qwest seeks removal of the recommended commitment and requests that the requirement to add SGAT language be removed as well. Additionally, Qwest believes that the SGAT is the place to memorialize Qwest’s specific and concrete legal obligations, and that aspirational goals should not be incorporated in the SGAT.

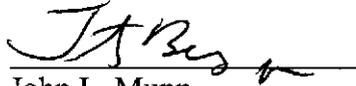
CONCLUSION

Qwest, again, commends the Staff and the Hearing Division for their hard work involved with the Report. Qwest is prepared to accept virtually every aspect of the Report. Nonetheless, Qwest seeks clarification and modification of the one issue mentioned above. Qwest asks that the Commission adopt the Report as modified in Qwest’s comments herein.

¹ See Report, at ¶ 77.

Respectfully submitted this 11th day of October, 2001.

RESPECTFULLY SUBMITTED,



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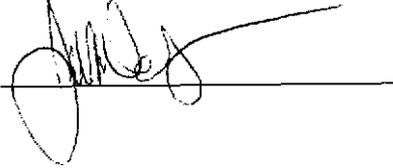
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A handwritten signature in black ink, appearing to read 'Adrienne M. Anderson', is written over a horizontal line. The signature is stylized and cursive.

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