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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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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

AT&T'S COMMENTS REGARDING
QWEST'S REVISED SGAT
SECTIONS ON RE SALE

AT&T Communications of the Mountain States, Inc. and TCG Phoenix
(collectively "AT&T") hereby submit their Comments Regarding Qwest's Revised
SGAT Sections on Resale.

COMMENT

AT&T reviewed the following revised SGAT sections on resale: § 6.2.3 *et seq.*
and § 6.4.1. Its Comments are limited to those two sections, but it reserves the right to
address any other resale sections with the Federal Communications Commission ("FCC")
at the appropriate time.

I. SGAT § 6.2.3 *et seq.*

With respect to the Commission's decision related to § 6.2.3 *et seq.*, AT&T
appreciates that the Commission recognizes the distinctions between the PAP penalties
and the unmet harm the competitive local exchange carriers ("CLECs") may encounter.
In light of that recognition, AT&T recommends that the Commission further order Qwest
to delete from its SGAT the following language:

6.2.3 Qwest shall provide to CLEC Telecommunications Services for resale that are at least equal in quality and in substantially the same time and manner that Qwest provides these services to itself, its subsidiaries, its affiliates, other Resellers, and Qwest's retail end users. Qwest shall also provide resold services to CLEC in accordance with the Commission's retail service quality requirements, if any. Qwest further agrees to reimburse CLEC for credits or fines and penalties assessed against CLEC as a result of Qwest's failure to provide service to CLEC, ~~subject to the understanding that any payments made pursuant to this provision will be an offset and credit toward any other penalties voluntarily agreed to by Qwest as part of a performance assurance plan, and further~~ subject to the following provisions:

Offset, in-and-of-itself, is not a concept that AT&T disagrees with, but in this context because the PAP provides absolutely no recovery for the particular damage contemplated by § 6.2.3, Qwest should not be engaged in any unilaterally determined offset. It is simply inappropriate.

II. SGAT § 6.4.1

The language of SGAT § 6.4.1 in Qwest's revised SGAT is consistent with the Commission's order.

Respectfully submitted this 22nd day of October, 2001.

**AT&T COMMUNICATIONS OF THE
MOUNTAIN STATES, INC. AND TCG
PHOENIX**

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CERTIFICATE OF SERVICE

I certify that the original and 10 copies of AT&T's Comments Regarding Qwest's Revised SGAT Sections on Resale in Docket No. T-00000A-97-0238 were sent by overnight delivery on October 19, 2001 to:

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