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BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

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Arizona Corporation 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 REGARDING POST-OSS TEST PID  
COLLABORATIVE**

Qwest Corporation ("Qwest") hereby submits its comments in response to the Arizona Corporation Commission ("ACC") Staff's request for comments regarding whether the ACC should join the Regional Oversight Committee's ("ROC") efforts to organize a post-OSS test PID collaborative.

Staff requested that the parties provide comments regarding whether Arizona should join the ROC's efforts to organize a collaborative to discuss PID issues after OSS testing is complete. Qwest believes that a fourteen state collaborative could provide a useful forum to allow the parties to develop and raise issues, make proposals, and reach agreements, which could then be brought to state commissions for consideration as allowed by Performance Assurance Plans. The ROC's discussions regarding establishing such a forum are in the preliminary stages and not all parties agree on the scope and function. However, Qwest hopes that an acceptable approach can be established. Qwest encourages the ACC staff to join the

ROC discussions. Qwest has attached its recently submitted Comments on ROC PID Administration for the Commission's review.

Dated this 29th day of March, 2002.

RESPECTFULLY SUBMITTED,



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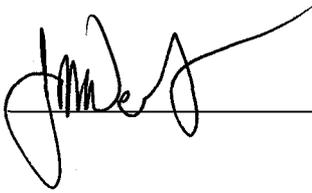
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**QWEST'S COMMENTS ON ROC PID ADMINISTRATION**

- 1. Once the ROC OSS test is completed, should the ROC PIDs be administered by a ROC-based entity similar to the ROC OSS TAG, Steering Committee and Executive Committee structure used for the test?**

The term "PID administration" is very broad. Qwest notes that, post-entry, oversight over PIDs that are in PAP shifts to the states in their enforcement of the terms of the PAP. The PIDs that form the foundation of Qwest's performance assurance plan will become a part of interconnection agreements between Qwest and CLECs electing the PAP and approved by each state commission. As such, there are legal considerations that determine when and how the PIDs can be changed or whether new PIDs can be added. The ultimate decision as to changes to a PAP must be determined according to the provisions outlined therein.

While Qwest does not believe that a ROC forum can or should mandate changes to PIDs in the performance assurance plans, it envisions a potential role for an ongoing forum in which interested parties, Qwest, CLECs and state staff members could discuss PID issues, make proposals for changes and reach agreements, which could then be brought to the states for consideration as allowed by the PAPs.

- 2. If the answer to question #1 is yes, please indicate how that should be accomplished, such as by extension of the current ROC TAG, development of a new TAG specifically for PID administration or any other suggestions.**

Qwest supports an effort that is organized by the ROC. However, in the absence of an OSS test or other process for which immediate decisions are required--and in light of the legal issues referred to above--Qwest does not believe that the current ROC test governance structure is either necessary or appropriate. Rather, some mediated or facilitated structure would more aptly fit with the structure of the performance assurance plans. (CMP or any industry forum which has the ability to determine outcomes is similarly inappropriate.)

- 3. If the answer to #1 is no, please describe your recommendations for achieving a PID administration entity and process outside of the ROC.**

Qwest foresees a collaborative forum in which the parties could develop and raise specific issues, make proposals and reach agreements. In order

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for this process to be useful for Commission reviews, the proceedings should be transcribed and fully documented. If the process is "mediated," it could result in the identification of issues that have been agreed to, as well as those that remain unresolved.

- 4. What should the scope of the PID administration function be? i.e. changes to PIDs, oversight of audits, etc? Should the scope of the function be extended beyond PID administration? If so, to what?**

The scope of any PID forum should be limited to reviewing existing and new performance measurements as discussed in response to question no.1. While Quest supports a regional and consolidated auditing of its performance measurements, that process is defined in its PAPs. In its PAP for the nine states reviewed by Mr. Antonuk, and pursuant to Mr. Antonuk's recommendation, Qwest agreed to allow the participating Commissions to conduct a regional audit, the guidelines and parameters of which are identified in section 15.0 of the QPAP. This program would be funded by one-fifth of the Tier 1 amounts payable to CLECs for each participating state and one-third of the Tier 2 amounts payable to each participating state.

- 5. What should be the design of the management and governance structure?**

See above

- 6. How should the PID administration process work?**

See above

- 7. How should any costs of PID administration be funded?**

The same QPAP fund that pays for audits will be used to pay for a collaborative six-month review process. This fund, which consists of one-fifth of the Tier 1 amounts payable to CLECs for each participating state and one-third of the Tier 2 amounts payable to each participating state, could be considered for the administrative costs of a PID forum.

- 8. How frequently should PID administration activities be conducted?**

Formally, no more than once monthly, with limited sub-committee activity more frequently, if necessary and as agreed to by the parties.

- 9. What are your views on the length of the initial charter/sunset timeframe of this function?**

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Initially, for eighteen months. At that time, the parties can determine whether continuation in a similar or revised form is appropriate.

**10. What other comments do you have regarding on-going PID administration in a post-test environment?**

None at this time

**11. Absent a multi-state approach to PID administration, how should PIDs be administered and incorporated into individual state PAPs?**

The PAPs already provide for administration and incorporation of performance measurements. Any ROC forum addressing PIDs must necessarily provide a supporting role.