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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 FIRST 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 2003, 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

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

24 month review. Accordingly, Qwest submits this second quarterly filing of CLEC aggregated EDI response times. The results for each month in the second quarter of 2003 are listed below.

Transactions for CLECs on all Releases Compared to IRTM Transactions – Apr 2003								
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 (Excluded all Internal Trading Partners (IRTM))	ADDRVAL	401997	3.88	0.826	0.359	2.695	2.95	-0.255
	SERVAVAIL	0	N/A	N/A	N/A	N/A	11.08	N/A
	CSR	247794	4.767	0.97	0.403	3.394	3.53	-0.136
	APPTSCHED	1410	3.928	0.334	0.268	3.326	3.76	-0.434
	TN	993	7.267	0.379	0.291	6.597	6.15	0.447
	FACCHECK	804	8.495	0.345	0.307	7.843	6.43	1.413
	LOOPQUALTO OLS	7558	12.647	1.197	0.601	10.849	15.76	-4.911
	RESALELOOP QUAL	0	N/A	N/A	N/A	N/A	4.94	N/A
	CFA	12	8.298	0.347	0.092	7.859	8.72	-0.861
MPQ	0	N/A	N/A	N/A	N/A	5.85	N/A	

Transactions for CLECs on all Releases Compared to IRTM Transactions – May 2003								
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 (Excluded all Internal Trading Partners (IRTM))	ADDRVAL	369335	3.758	0.714	0.348	2.696	2.85	-0.154
	SERVAVAIL	0	N/A	N/A	N/A	N/A	10.33	N/A
	CSR	237487	4.629	0.761	0.46	3.408	3.49	-0.082
	APPTSCHED	1367	3.831	0.387	0.277	3.167	3.42	-0.253
	TN	1073	6.978	0.536	0.489	5.953	5.74	0.213
	FACCHECK	915	9.144	0.43	0.272	8.442	6.57	1.872
	LOOPQUALTO OLS	2095	10.287	1.029	0.253	9.005	17.91	-8.905
	RESALELOOP QUAL	0	N/A	N/A	N/A	N/A	4.55	N/A
	CFA	7	6.191	0.339	0.109	5.743	8.72	-2.977
MPQ	0	N/A	N/A	N/A	N/A	5.63	N/A	

Transactions for CLECs on all Releases Compared to IRTM Transactions – Jun 2003								
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 (Excluded all Internal Trading Partners (IRTM))	ADDRVAL	372969	3.958	0.869	0.376	2.713	2.87	-0.157
	SERVAVAL	0	N/A	N/A	N/A	N/A	11.04	N/A
	CSR	258168	4.851	0.916	0.392	3.543	3.5	0.043
	APPTSCHED	1630	3.784	0.441	0.274	3.069	3.44	-0.371
	TN	1355	6.974	0.502	0.377	6.095	5.81	0.285
	FACCHECK	1339	10.102	0.656	0.267	9.179	7.13	2.049
	LOOPQUALTO OLS	2203	14.662	1.064	0.225	13.373	22.08	-8.707
	RESALELOOP QUAL	0	N/A	N/A	N/A	N/A	5.08	N/A
	CFA	4	6.657	0.344	0.088	6.225	8.97	-2.745
	MPQ	0	N/A	N/A	N/A	N/A	5.68	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.

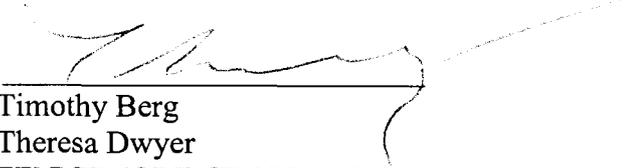
Qwest has excluded response times from IMA's internal production load, release and pre-start testing. These transactions are similar to Qwest's internally generated IRTM transactions, except they are used to verify a major release, check systems performance and load levels, or pretest all systems during system maintenance windows before excepting 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 2003.

RESPECTFULLY SUBMITTED this 31st day of July, 2003.

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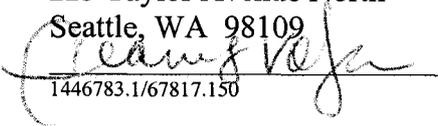
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