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12 IN THE MATTER OF QWEST
13 CORPORATION'S COMPLIANCE WITH
14 § 271 OF THE TELECOMMUNICATIONS
15 ACT OF 1996

Docket No. T-00000A-97-0238

16 **QWEST CORPORATION'S THIRD**
17 **QUARTERLY FILING**
18 **OF ACTUAL CLEC EDI RESPONSE**
19 **TIMES**

20 Qwest Corporation (Qwest) hereby provides aggregated actual CLEC EDI
21 response times for the months of July, August and September 2003, produced in
22 compliance with the Arizona Corporation Commission Staff's Impasse Issue #940
23 Resolution: Use of IRTM for PID PO-1B. In this resolution, Staff required Qwest to
24 develop the capability to report actual CLEC Pre-Order/Order Response Times for EDI
25 transactions at Qwest's Interactive Agent (IA) by year end 2002, and to track these results
26 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

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

1 for EDI transactions and proposing that the monthly aggregated results be reported on a
 2 quarterly basis until the 18 and/or 24 month review. Accordingly, Qwest submits this
 3 third quarterly filing of CLEC aggregated EDI response times. The results for each month
 4 in the third quarter of 2003 are listed below.
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| Transactions for CLECs on all Releases Compared to IRTM Transactions - July 2003 | | | | | | | | |
|--|----------------|-------|--------|-----------|------------|-------------|-------|-------------|
| CLEC | TRANS_TYPE | CLEC | Avg. | Avg. IA | Avg. IA | CLEC Avg | IRTM | Differences |
| | | Obs. | Time | Process | Process | IA | Avg. | |
| | | | (1) | Time | Time | Process | Time | |
| | | | | (Inbound) | (Outbound) | (1) - (2) - | Time | |
| | | | | (2) | (3) | (3) | (4) | |
| All CLECs | ADDRVAL | 20596 | 4.199 | 0.792 | 0.382 | 3.025 | 2.86 | 0.165 |
| (Excluded all | SERVAVAL | 0 | N/A | N/A | N/A | N/A | 11.66 | N/A |
| Internal | | | | | | | | |
| Trading | CSR | 21994 | 4.32 | 0.606 | 0.245 | 3.469 | 3.38 | 0.089 |
| Partners | | | | | | | | |
| (IRTM)) | APPTSCHED | 171 | 3.911 | 0.413 | 0.267 | 3.231 | 3.37 | -0.139 |
| | TN | 164 | 6.717 | 0.451 | 0.296 | 5.97 | 5.5 | 0.47 |
| | FACCHECK | 241 | 10.444 | 0.779 | 0.304 | 9.361 | 7.33 | 2.031 |
| | LOOPQUALTOOLS | 315 | 11.451 | 1.16 | 0.248 | 10.043 | 21.53 | -11.487 |
| | RESALELOOPQUAL | 0 | N/A | N/A | N/A | N/A | 5.42 | N/A |
| | CFA | 0 | N/A | N/A | N/A | N/A | 9 | N/A |
| | MPQ | 0 | N/A | N/A | N/A | N/A | 5.5 | N/A |

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| Transactions for CLECs on all Releases Compared to IRTM Transactions - August 2003 | | | | | | | | |
|--|----------------|--------|----------|---------------|----------------|-----------------|----------|-------------|
| CLEC | TRANS_TYPE | CLEC | Avg. | Avg. IA | Avg. IA | CLEC Avg - | IRTM | Differences |
| | | Obs. | Time (1) | Process Time | Process Time | IA Process | Avg. | |
| | | | | (Inbound) (2) | (Outbound) (3) | (1) - (2) - (3) | Time (4) | |
| All CLECs | ADDRVAL | 270260 | 4.075 | 0.798 | 0.369 | 2.908 | 3.68 | -0.772 |
| (Excluded all | SERVAVAL | 0 | N/A | N/A | N/A | N/A | 9.4 | N/A |
| Internal Trading | CSR | 309793 | 4.435 | 0.657 | 0.261 | 3.517 | 3.75 | -0.233 |
| Partners (IRTM)) | APPTSCHED | 1682 | 4.055 | 0.544 | 0.336 | 3.175 | 3.42 | -0.245 |
| | TN | 1891 | 6.783 | 0.558 | 0.33 | 5.895 | 5.73 | 0.165 |
| | FACCHECK | 2573 | 11.37 | 0.872 | 0.27 | 10.228 | 7.32 | 2.908 |
| | LOOPQUALTOOLS | 2606 | 11.921 | 1.053 | 0.249 | 10.619 | 14.39 | -3.771 |
| | RESALELOOPQUAL | 0 | N/A | N/A | N/A | N/A | 6.46 | N/A |
| | CFA | 6 | 6.019 | 0.349 | 0.088 | 5.582 | 9.28 | -3.698 |
| | MPQ | 0 | N/A | N/A | N/A | N/A | 5.7 | N/A |

| Transactions for CLECs on all Releases Compared to IRTM Transactions - September 2003 | | | | | | | | |
|---|----------------|--------|----------|---------------|----------------|-----------------|----------|-------------|
| CLEC | TRANS_TYPE | CLEC | Avg. | Avg. IA | Avg. IA | CLEC Avg - | IRTM | Differences |
| | | Obs. | Time (1) | Process Time | Process Time | IA Process | Avg. | |
| | | | | (Inbound) (2) | (Outbound) (3) | (1) - (2) - (3) | Time (4) | |
| All CLECs | ADDRVAL | 313258 | 4.078 | 0.777 | 0.335 | 2.966 | 3.77 | -0.804 |
| (Excluded all | SERVAVAL | 0 | N/A | N/A | N/A | N/A | 9.45 | N/A |
| Internal Trading | CSR | 349730 | 4.478 | 0.668 | 0.255 | 3.555 | 3.44 | 0.115 |
| Partners (IRTM)) | APPTSCHED | 2240 | 4.366 | 0.496 | 0.224 | 3.646 | 3.49 | 0.156 |
| | TN | 4616 | 6.557 | 0.522 | 0.205 | 5.83 | 5.72 | 0.11 |
| | FACCHECK | 4520 | 11.323 | 0.748 | 0.2 | 10.375 | 7.35 | 3.025 |
| | LOOPQUALTOOLS | 1981 | 11.632 | 1.88 | 0.737 | 9.015 | 14.3 | -5.285 |
| | RESALELOOPQUAL | 0 | N/A | N/A | N/A | N/A | 6.27 | N/A |
| | CFA | 2 | 8.874 | 0.355 | 0.095 | 8.424 | 8.91 | -0.486 |
| | MPQ | 0 | N/A | N/A | N/A | N/A | 5.85 | 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

1 comparison of the results from actual transactions with results from IRTM transactions,
2 since the processing time at the IA, as captured in actual transactions, is directly impacted
3 by a CLEC's selection of hardware and software.
4

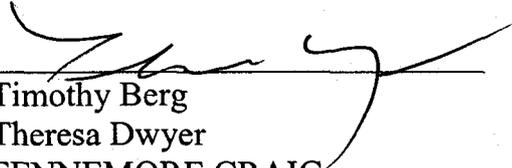
5 As Qwest has previously stated, the type of hardware a CLEC chooses can directly
6 impact the transaction measurements. For example, if a CLEC uses nonstandard
7 configurations, a slower server, or slower than normal network connections, then that
8 CLEC's results will be much greater than those of a CLEC using more efficient hardware.
9 Additionally, because the time period measured does not end until Qwest receives an
10 acknowledgement from the CLEC, the response time will be longer if a CLEC's IA takes
11 longer to send the acknowledgement. Further, it is possible for a CLEC to structure
12 certain queries in a way that increases the processing time, *e.g.*, by including multiple
13 lines in a single ADSL Loop Qualification query.
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16 Qwest has excluded response times from IMA's internal production load, release
17 and pre-start testing. These transactions are similar to Qwest's internally generated IRTM
18 transactions, except they are used to verify a major release, check systems performance
19 and load levels, or pretest all systems during system maintenance windows before
20 excepting co provider transactions. Since these transactions are easily identified due to the
21 unique co provider identifiers used, and are not CLEC transactions they are not included
22 in the quarterly measurements. Any active production co provider sending data during a
23 production load test would still have all their data measurements reported.
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1 In conclusion, Qwest has complied with the Staff's Impasse Resolution to develop
2 the capability to measure actual EDI transactions by year-end 2002.

3 Qwest now provides, with this filing the results for the third quarter of 2003.

4 RESPECTFULLY SUBMITTED this 29th day of October 2003:
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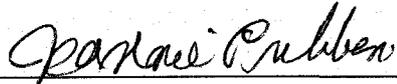
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