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Rachel Torrence
Director – Technical/Regulatory and Network Policy

August 14, 2007

Julie Orchard
Commission Administrator
Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84111

RE: Docket No. 07-049-31

Dear Julie:

On Friday, August 10th, Qwest received a letter from Commissioner Stamp in Iowa indicating that the Utah Public Service Commission (Commission), its staff or the Utah Division of Public Utilities (DPU) may be interested in extending the statutory timeframe related to a Joint Stipulation reached between Qwest and several CLECs that addresses agreed upon changes to both the Qwest Performance Assurance Plan ("QPAP") for Utah and the 14-State Performance Indicator Definition ("PID"). As you may already be aware, different states in the region have approached these filings differently.

On July 19th, the DPU requested data on the impact of the proposed changes on Tier 2. Qwest will be providing data to the DPU this week addressing the impacts of the proposed changes on prior performance (July 2006 through June 2007) from both a Tier 1 and Tier 2 perspective. Should the Commission or the DPU then believe there is a need to continue a review of the filing, Qwest does not anticipate a need to oppose that extended review and further could agree to modify the retroactive application of the retail analogue in the hope that the other Stipulating Parties would also agree to not oppose an extension. Qwest is also prepared to implement in the event the Commission and the DPU are comfortable with the existing opportunity for review.

From Qwest's perspective, this recent filing is similar to two previous filings made after agreements were reached with some CLECs in the region. The joint stipulation was reached after a year of negotiations and is the result of much give and take. If past history is any indicator, no CLEC filed comments or intervened in those prior filings/proceedings that was not already involved in the process although, and like the current filing, they were given the opportunity to do so. Thus, we continue to hope that with the data being provided by Qwest, any concerns are sufficiently alleviated by the limited impact as well as the apparent lack of concern by the companies most impacted by the filing, other CLECs.

In any event, we remain available to address any concerns you may have and encourage you to contact us with any questions or lingering concerns you may have.

Sincerely,

Rachel Torrence

cc: Casey Coleman, DPU
Laura Scholl, DPU
Laurel Burke, Esq., Qwest
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