Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Thousands-Block Number Pooling Tariff Filing	)	Transmittal No. 120
	)	
Qwest Corporation	)	

REPLY TO OPPOSITIONS

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March 29, 2002

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SUMMARY

In this Reply, Qwest responds to AT&T's and WorldCom's oppositions to tariff Transmittal No. 120. This Transmittal contains an exogenous cost adjustment to recover Qwest's extraordinary costs of implementing thousands-block number pooling ("TBNP"). In opposing Transmittal No. 120, opponents advocate that the Commission adopt an implausibly narrow reading of its three-pronged cost eligibility test in order to disallow even more costs that were incurred solely "for the provision of" thousands-block number pooling. Opponents' unreasonable interpretation of the Commission's cost eligibility test neither comports with the Commission's *Numbering Resource Optimization Orders* nor the 1996 Act and should be rejected by the Commission.

Contrary to opponents' protestations, Qwest's exogenous cost adjustment complies with the Commission's three-pronged cost eligibility test and has been reduced by the cost savings of delaying NPA relief during the cost recovery period. Except for the inclusion of some switched generic costs all TBNP costs that are included in Transmittal No. 120 would not have been incurred "but for" TBNP and were incurred "for the provision of" TBNP. As such, the Commission should allow Transmittal No. 120 to take effect as scheduled.

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REPLY TO OPPOSITIONS

Qwest Corporation ("Qwest"), through counsel and pursuant to the Federal Communications Commission's ("Commission") Rule 47 C.F.R. Section 1.773(b),[1] hereby replies to the oppositions of AT&T Corp. ("AT&T") and WorldCom, Inc. ("WorldCom") to Qwest's Transmittal No. 120[2] which contains an exogenous cost adjustment increasing Qwest's interstate access charges to recover extraordinary costs directly related to implementing thousands-block number pooling ("TBNP").[3] The Commission required carriers to begin implementing TBNP in the top 100 Metropolitan Statistical Areas ("MSA") beginning on March 15, 2002[4] and has allowed price cap carriers to recover extraordinary TBNP costs over a two-

[1] 47 C.F.R. § 1.773(b).

[2] Transmittal No. 120 filed March 18, 2002.

[3] In its *Third Report and Order* the Commission found that number pooling costs are access-related and allowed incumbent local exchange carriers ("ILEC") to recover extraordinary costs of implementing TBNP through an exogenous cost adjustment in the price cap mechanism. *In the Matter of Numbering Resource Optimization, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, Telephone Number Portability*, CC Docket Nos. 99-200, 96-98 and 95-116, *Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200*, FCC 01-362, rel. Dec. 28, 2001 ("*Third Report and Order*") ¶ 35.

[4] The national roll-out of TBNP in the top 100 MSAs began on March 15, 2002 and will be implemented over the next eight quarters. *See Public Notice, The Common Carrier Bureau Announces the First Quarter Schedule for National Thousands-Block Number Pooling*, DA 01-3019, rel. Dec. 28, 2001.

year period beginning April 2, 2002.[5]

In this reply, Qwest refutes opponents' claims that the exogenous cost adjustment contained in Transmittal No. 120 should be disallowed. Contrary to their protestations, Qwest's exogenous cost adjustment complies with the Commission's three-pronged cost eligibility test to recover TBNP costs and all cost savings associated with delaying NPA relief have been deducted from this adjustment. Except for the inclusion of some switched generic costs Qwest has fully complied with the requirements of the Commission's number pooling orders and Transmittal No. 120 should be allowed to take effect as scheduled on April 2, 2002.

I. INTRODUCTION

While AT&T and WorldCom challenge many different aspects of Qwest's TBNP costs, their arguments can be summarized as follows: 1) Qwest has failed to comply with the Commission's three-pronged test in identifying costs that are eligible for recovery;[6] 2) Qwest has included TBNP costs in Transmittal No. 120 that were incurred prior to March 15, 2002, the starting date for implementing national number pooling;[7] and 3) Qwest has underestimated savings associated with delaying/avoiding area code splits and overlays and delaying a complete overhaul of NANP. Each of opponents' claims lacks merit, as Qwest demonstrates below.

Opponents' sudden interest in the details of Qwest's TBNP costs can be explained by the Commission's decision in the *Third Report and Order* to allow price cap carriers to recover their TBNP costs through an exogenous cost adjustment to access charges rather than through a

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[5] *Third Report and Order* ¶ 41.

[6] *See* AT&T at 2-3; WorldCom at 2.

[7] AT&T at 7-9.

charge on end-users,[8] as was the case with local number portability ("LNP"). Regardless of the method of recovery, Qwest demonstrates that the costs included in Transmittal No. 120 are extraordinary costs directly related to number pooling and in full compliance with the Commission's *Third Report and Order*.

II. OPPONENTS' READING OF THE COMMISSION'S THREE-PART TBNP COST ELIGIBILITY TEST IS IMPLAUSIBLY NARROW

There is no question that in the *Third Report and Order* the Commission adopted a very restrictive, if not unreasonable, three-part test to determine which number pooling costs are eligible for recovery. This test is very similar to the test adopted in the LNP proceeding and only permits recovery of:

1. "[C]osts that would have been incurred 'but for' thousands-block number pooling."[9]
2. "[C]osts incurred 'for the provision of' thousands-block number pooling."[10]
3. "'[N]ew' costs"[11]

The Commission concluded that "costs specifically incurred in the narrowly defined thousands-block pooling functions are those incurred specifically to identify, donate and receive blocks of pooled numbers, to create and populate the regional databases and carriers' local

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[8] *Compare* Qwest's comments, filed May 19, 2000, in CC Docket No. 99-200 wherein Qwest discussed a two-part cost recovery mechanism and then later in its comments to the *Second Further Notice of Proposed Rulemaking*, filed Feb. 14, 2001, updating the cost recovery information to AT&T's May 19, 2000 comments and its scant discussion of cost recovery and its May 14, 2001 comments wherein its position on cost recovery is basically non-existent.

[9] *Third Report and Order* ¶ 43.

[10] *Id.*

[11] *Id.*

copies of these databases, and to adapt the procedures for querying these databases and for routing calls so as to accommodate a number pooling environment."[12]

Despite Qwest's fundamental disagreement with this standard, Qwest has used it to identify TBNP costs to be recovered in Transmittal No. 120. Opponents now advocate that the Commission adopt an implausibly narrow reading of its three-pronged eligibility test in order to disallow even more costs that were, in fact, incurred solely "for the provision of" thousands-block number pooling.

For example, AT&T and WorldCom contend that Qwest's costs associated with categorizing and inventorying telephone numbers, calculating Qwest's utilization rate, and producing viable forecasts do not satisfy the Commission's cost eligibility test because they are not used "for the provision of" TBNP.[13] That is nonsense. Telephone numbers must be categorized and inventoried so that Qwest can properly "identify" thousands blocks to be donated to the pool and "donate" these blocks appropriately. For example, only thousands blocks with 10% contamination or less can be sent to the pool. Furthermore, carriers must meet utilization and forecast criteria in a pooling environment to "receive" numbers from the pool. Moreover, in a pooling environment, Qwest is allowed to keep only a six-month inventory of numbers within a rate center. If Qwest does not accurately calculate its utilization rate and produce forecasts it cannot properly "donate" or "receive" blocks of numbers to/from the pool. Industry guidelines and the Commission's own mandates support this position.[14] However, it is

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[12] *Id.* ¶ 44.

[13] AT&T at 13-15. WorldCom at 5.

[14] "According to the Thousand Block Pooling Guidelines, the quantity of the thousands block in the industry inventory pool should be determined by the Pooling Administrator based upon: '(a) the number of SPs [Service Providers] participating in a given rate area; (b) the individual forecasts provided by each of the thousand block pooling participants; (c) the anticipated rate of

much more convenient for AT&T and WorldCom to gloss over these findings in an effort to thwart recovery of costs legitimately incurred for the provision of number pooling. In short, without these activities, it would be impossible to implement number pooling.

The above discussion of Qwest's use of number inventories, utilization rates, and forecasts is but one example of many instances where opponents attempt to persuade the Commission to disallow *bona fide* TBNP costs by artfully reading the Commission's *Numbering Resource Optimization Orders*. In its *Orders*, the Commission adopted its three-part test largely because of its concern that LECs might over-recover TBNP costs, not because LECs might not be able to recover their extraordinary TBNP costs. But that is exactly what could happen if the Commission accepts AT&T's tortured reading and application of the Commission's *Third Report and Order* and disallows *bona fide* TBNP costs.

Opponents' only objective in this proceeding is to minimize their access charge costs by opposing any exogenous cost adjustment, regardless of whether it complies with the Commission's standard. The Commission should not be led down this path and should reject opponents' claims that are based on an implausibly narrow reading of the Commission's three-part TBNP cost eligibility test. Such an approach is at odds with the *Third Report and Order* and, above all, the language of the 1996 Act.

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assignment of the thousand blocks within the industry inventory pool; and (d) a minimum inventory of at least six months in the industry inventory pool at all times.'" *In the Matter of Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rule Making*, 15 FCC Rcd. 7574, 7660 n.454 (2000) ("*First Report and Order*"). "Thus, consistent with the INC Thousand Block Pooling Guidelines, we require all carriers to donate all thousands-blocks that have less than ten-percent contamination level to the thousands-block number pool for the rate center from which the numbering resources are assigned." *Id.* at 7661 ¶ 191.

III. THE COMMISSION HAS NOT PRECLUDED LECs FROM RECOVERING TBNP COSTS INCURRED BEFORE MARCH 15, 2002 AS AT&T ASSERTS

AT&T asserts that the Commission's number pooling orders prohibit LECs from recovering any number pooling costs incurred before March 15, 2002 through a federal exogenous cost adjustment.[15] AT&T is wrong. The Commission's *Orders* say no such thing. AT&T arrives at its ludicrous conclusion by assuming that all TBNP costs incurred before March 15, 2002, the date of the commencement of the national roll-out, must be state costs and, therefore, must be disallowed. AT&T's logic is fatally flawed. There would be no national roll-out of TBNP without extensive prior planning and expenditures. The Commission recognized this in addressing federal/state jurisdictional issues in its *Third Report and Order*.

In reiterating that the states are responsible for implementing cost recovery plans for advanced implementation of TBNP in a given state jurisdiction, the Commission recognized that most costs were not state specific.[16] The Commission directed carriers to assign "advancement costs" to state jurisdictions when carriers incurred TBNP costs at the state level prior to the implementation of national TBNP.[17] This is exactly what Qwest did in preparing Transmittal No. 120. That is, Qwest included only national TBNP costs in Transmittal No. 120, and deducted advancement costs of state trials from overall TBNP costs.

Furthermore, in the *First Report and Order* the Commission supported a staggered roll-out of number pooling. The Commission noted that a staggered roll-out is "necessary, primarily because an overload of the telecommunications network may cause network disruptions when

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[15] AT&T at 7-8.

[16] *Third Report and Order* ¶ 29.

[17] "In other words, carrier-specific costs directly related to number pooling that are incurred for national implementation of thousands-block number pooling should be recoverable through the

carriers' Service Control Points (SCPs) capacity has been depleted."[18] The Commission went on to say that a staggered roll-out would provide carriers with "time to upgrade and replace SCPs and other components of their network, as necessary, if the increased volume of ported numbers as a result of pooling requires them to do so."[19] Clearly, the Commission anticipated that work would be required prior to the roll-out date in order to facilitate pooling once the date arrives.[20]

The Commission should reject AT&T's twisted logic and allow Qwest to recover national TBNP costs incurred prior to March 15, 2002, as long as Qwest assigns any advancement costs associated with individual state trials to those states (which Qwest has done in preparing Transmittal No. 120).[21]

IV. QWEST'S COSTS OF IMPLEMENTING TBNP EXCEED ANY SAVINGS ASSOCIATED WITH TBNP

In an attempt to demonstrate that Qwest should not be allowed to recover any of its TBNP costs, AT&T asserts that any TBNP costs are far outweighed by the monumental savings of delaying the exhaust of the NANP, as it is currently designed. AT&T cites estimates of the North American Numbering Council ("NANC") for its claim that the industry would save $19-

federal mechanism, but any costs attributable to advance deployment at the state level will be subject to state recovery mechanisms." *Id.*

[18] *First Report and Order*, 15 FCC Rcd. at 7645-46 ¶ 159.

[19] *Id.*

[20] Moreover, the Commission recognized that the time needed to implement number pooling is dependent on a number of variables, including "the need for enhancements to switches, SCPs, and other service provider systems, and availability of hardware and software changes from vendors." The Commission also identified a list of tasks that service providers, together with equipment vendors, must accomplish to achieve TBNP. "These tasks include modifications to service provider LSMSs and SCPs, enhancements to Service Order Administration Systems (SOAs) and operations support systems; enhancements to switches, and subsequent testing." *First Report and Order*, 15 FCC Rcd. at 7649-50 ¶ 167.

[21] *See* Chart 2b, Transmittal No. 120.

64 billion because TBNP will delay NANP exhaust by 18-20 years.[22] While NANC has every reason to be concerned about exhaust of the NANP, these estimates are pure speculation and cannot be used as an excuse for disallowing recovery of *bona fide* TBNP costs.[23]

Regardless of whether the cost of expanding NANP is $50 or $150 billion, these costs would never be considered to be either general numbering administration costs or general network upgrade costs, as AT&T assumes. Clearly, if the industry were faced with such enormous expenditures, all price cap carriers would assert, and rightfully so, that these expenditures qualified for exogenous cost treatment under the Commission's price cap rules. As such, the Commission should reject AT&T's claims of savings associated with delaying NANP exhaust as highly speculative and beyond the scope of this proceeding. Furthermore, industry-wide expenditures of $50-$150 billion would never be considered to be ordinary costs of number administration by this Commission, or any other reasonable observer. In evaluating Transmittal No. 120 and similar LEC tariffs, the Commission should focus on savings associated with deferring area code relief rather than the costs of a total "overhaul" of the NANP.

Not surprisingly, AT&T also asserts that Qwest has understated the savings accruing from delaying area code relief. Qwest disagrees. AT&T's claim is based on the assumption/assertion that any savings from the delay of area code splits and overlays should not be time bound.[24] Thus, under AT&T's theory, the Commission should limit LECs' recovery of TBNP costs to two years while including, as an offset, all future savings from delaying area code

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[22] AT&T at 15.

[23] It is ironic that AT&T appears to have no problem accepting the highly speculative and very broad estimates of the costs of NANP expansion while it challenges Qwest's *bona fid*e TBNP costs at every turn.

splits and overlays. This is not a reasonable reading of the Commission's requirements, nor would it constitute reasoned decision-making.

It would be reasonable to include savings beyond two years (*i.e.*, post-April 2, 2004) if LECs were allowed to recover their TBNP costs through an ongoing exogenous cost adjustment. But they are not -- cost recovery is limited to two years. It is both reasonable and consistent with the Commission's past treatment of timing differences to include only savings accruing during the two-year recovery period as an offset, but no more.

Qwest has included, as an offset in the calculation of its exogenous cost adjustment, all savings associated with the delay of area code splits and overlays during the two year cost recovery period.[25] Area code relief occurs with regularity and Qwest believes that its estimates of cost savings are reasonably accurate.[26] While Qwest is confident that the information contained in Transmittal No. 120 is sufficient for purposes of calculating an offset to Qwest's TBNP costs, if the Commission determines that further information is needed to support these cost savings, Qwest will make every effort to provide it.

V. OPPONENTS ARE MISTAKEN IN THEIR CLAIM THAT MANY TBNP COSTS HAVE ALREADY BEEN RECOVERED THROUGH LNP COST RECOVERY

AT&T asserts that many TBNP costs are already being recovered through the LNP surcharge and ordinary rate recovery mechanisms.[27] AT&T knows better. The Commission and commenters in this proceeding alike have recognized that significant incremental costs will be

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[24] "[T]hese companies [Qwest and BellSouth] should include not only the savings because of postponement of scheduled area code splits and overlays, but also the savings as a result of long-term avoidance of future area code splits and overlays." AT&T at 16.

[25] *See* Chart 2b, Transmittal No. 120.

[26] Qwest based its analysis on costs actually incurred for area code relief. Qwest averaged these costs across the NPA based on the type of area code relief (split v. overlay) most likely to be ordered by the state and by the number of switches that serve the area code.

incurred to provision TBNP.[28] While TBNP builds off the same LRN architecture that supports LNP, TBNP costs are over and above LNP costs. The *First Report and Order* demonstrates this quite clearly by noting the numerous changes and enhancements that carriers must make to provision TBNP. For example, it found that "[TBNP] requires carriers to modify significantly the manner in which they account for their inventory of telephone numbers, including changing their Operations Support Systems (OSSs) and retraining their staff."[29]

Furthermore, the Commission noted that the Alliance for Telecommunications Industry Solutions ("ATIS") has provided distinct technical requirements for number pooling. The Commission notes that these technical requirements address number pooling within an existing rate center within an NPA and utilize the LRN architecture that is used by LNP. These requirements also define the switching system, number portability database, and other requirements for TBNP to function in LNP-capable networks. Moreover, these requirements describe the network prerequisites that must be met for TBNP to function properly.[30]

Clearly things are not as AT&T would have them appear. TBNP is not LNP and the extraordinary costs incurred to provision TBNP properly qualify for recovery under the Commission's *Number Resource Optimization Orders*.

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[27] AT&T at 2, 7.

[28] *See* Reply Comments of Bell Atlantic, filed June 9, 2000, CC Docket No. 99-200 at 1-6; Reply Comments of BellSouth, filed June 9, 2000, CC Docket No. 99-200 at 23-26, Reply Comments of SBC, filed June 9, 2000, CC Docket No. 99-200 at 2-3; and Reply Comments of U S WEST (now Qwest), filed June 9, 2000, CC Docket No. 99-200 at 15-16.

[29] *First Report and Order*, 15 FCC Rcd. at 7657 ¶ 182.

[30] *Id.* at 7653-54 ¶ 174. The Commission also adopted the Thousand Block Pooling Guidelines developed by the INC which relate to the functioning of the Pooling Administrator and the entities requesting resources from the Pooling Administrator. *Id.* at 7660-62 ¶¶ 189, 191.

VI. QWEST'S COSTS INCLUDED IN TRANSMITTAL NO. 120 WERE INCURRED SOLELY "FOR THE PROVISION OF" TBNP AND WOULD NOT HAVE BEEN INCURRED OTHERWISE

In this section Qwest responds to opponents' claims that certain specific TBNP costs should be disallowed.

A. Generic Upgrades To Switch

Opponents assert that Qwest has improperly included the entire cost of generic software to upgrade 5ESS, AXE-10 and DMS-10 switches to accommodate TBNP.[31] Qwest disagrees. The only costs included for upgrading 5ESS switches were those costs directly related to TBNP functionality.[32] While it is true that Qwest has included the entire cost of generic upgrades for AXE-10 switches, these switches are being phased out and the generic upgrade is only being used to provide number pooling. "But for" number pooling this generic upgrade would never have been purchased. Lastly, it is also true that the entire cost of generic upgrades for DMS-10 switches were included in TBNP costs. It is also true that these generic upgrades may be used at some time in the future for a purpose other than TBNP. As such, Qwest will remove the costs associated with generic and memory card upgrades to some DMS-10 switches when it re-submits Transmittal No. 120.

B. Service Transfer Points ("STPs")

AT&T contends that Qwest has included the cost of additional pairs of STPs in its exogenous cost adjustment. This is not true. Although it is understandable how AT&T reached this conclusion, Qwest clarifies that it has not included the cost of additional STP pairs in Transmittal No. 120.

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[31] AT&T at 10; WorldCom at 2-3.

C. Service Control Points ("SCPs")

Opponents assert that Qwest incorrectly included its increased investment in SCPs to accommodate TBNP. Qwest disagrees. Hardware and software enhancements to the SCPs are necessary to provide for continued call routing in a TBNP environment. The LRN database structure is used to route calls to customers who have been assigned numbers from a pool. The Commission noted that "[t]o facilitate call routing when LRN LNP is utilized for number pooling, the entire population of pooled numbers in the pooling area, and associated LRNs, must be stored in all of the LNP SCP databases…"[33] Therefore, additional SCP capacity is necessary to provide continued call routing in a pooling environment. As such, Qwest's additional SCP costs would not have been incurred "but for" TNBP.

D. OSS Costs

Qwest has properly included costs incurred to adapt is Operations Support Systems (OSSs) to support TBNP. Transmittal No. 120 contains Qwest's costs separated by project category. The first category includes systems work that allows Qwest to identify, categorize and report numbers properly. As mentioned earlier, this process is integral to identifying contaminated blocks that are available for donation to the pool and providing the Pooling Administrator with accurate and reliable forecasts that are used to maintain the pools. The second category includes enhancements that must be made in order to assign numbers and route calls in a pooling environment. The third category includes enhancements that must be made to manage Qwest's local copies of the regional database in a pooling environment. Clearly these OSS changes are necessary to carry-out the number pooling directives as embodied in the

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[32] Rather than charging a single fee for a generic upgrade, Lucent has established separate right-to-use fees for specific features in new generic upgrades. Qwest has only included those costs in Transmittal No. 120 that are directly related to using number pooling functionality.

Commission's mandates and industry pooling requirements and guidelines. These costs satisfy the Commission's three-part cost eligibility test and are properly included in Transmittal No. 120 for recovery.

E. Trunking Capacity

Opponents assert that Qwest seeks to recover the costs of adding additional trunk capacity but has failed to justify why these costs are anything other than "incidental expenses that should be disallowed.[34] While Qwest believes that it is obvious why it will incur additional trunking costs with the roll-out of TBNP, it will provide further explanation. With the introduction of TBNP Qwest will experience increased messenging traffic on its inter-office network simply because many messenging providers will not yet have upgraded their switches to accommodate TBNP. In a perfect world where every provider sending messages over the public switched network would have already upgraded their switches to accommodate TBNP, it would not be necessary for Qwest to expand its trunking capacity. But the world is not perfect and Qwest would be naïve if it assumes that all providers had upgraded their switches. Without additional trunking facilities, voice messaging traffic would be routed incorrectly and calls would not be completed. The cost of this additional trunking capacity would not have been incurred "but for" number portability and is necessary "for the provision of" TBNP.

F. Service Delivery

Qwest has included service delivery costs in its TBNP costs. Opponents argue that these costs are incidental and fail to satisfy the Commission's three-part cost recovery test.[35] Opponents ignore reality. The service delivery costs that Qwest has included in Transmittal No.

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[33] *First Report and Order*, 15 FCC Rcd. at 7654-55 ¶ 176.

[34] AT&T at 10. WorldCom at 2.

120 are directly related to the introduction of TBNP. If Qwest did not incur these service delivery costs to update its databases, calls would not be properly routed in a number pooling environment because numbers would not have been identified, tracked and provisioned properly to customers.

G. Network Planning And Management

Opponents object to Qwest's inclusion and classification of certain network planning and management costs as TBNP costs.[36] Qwest disagrees. Qwest has included only those incremental network planning and management costs that are a direct result of implementing TBNP. While these costs may be viewed as general network administration costs at some time in the future (*i.e.*, after April 2, 2004), they clearly represent an incremental increase in prior network planning and management costs and are solely the result of TBNP. In addition, many of these job functions are necessary to identify, track and categorize numbers to provision a pooling environment. As mentioned earlier, if Qwest does not accurately calculate its utilization rate and produce forecasts it cannot properly "donate" or "receive" blocks of numbers to/from the pool. Industry guidelines and the Commission's own mandates support this position. Therefore, it is appropriate that these costs be included in Transmittal No. 120.

VII. CONCLUSION

As demonstrated above, opponents' arguments lack merit and are based on an unreasonable reading of the Commission's *Numbering Resource Optimization Orders*.

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[35] AT&T at 13-14; WorldCom at 6-7.

[36] AT&T at 11; WorldCom at 5-6.

Accordingly, the Commission should allow Transmittal No. 120 to take effect as filed. Qwest will make the necessary correction referenced above in Section IV.A. when it re-submits its exogenous cost adjustment in the near future.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Richard Grozier, do hereby certify that I have caused the foregoing **REPLY TO OPPOSITIONS** to be (1) filed with the FCC via its Electronic Tariff Filing System; (2) served via hand delivery on the persons/entity denoted with an asterisk (*); and (3) served via facsimile and United States First Class Mail, postage prepaid, upon the other parties listed on the attached service list.

/s/ Richard Grozier
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March 29, 2002

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Updated 3/29/2002