

March 13, 2003

John Berard-Covad
Mike Zulevic-Covad

Dear Mr. Berard and Mr. Zulevic:

This letter is in response to your formal escalation (PC101802-3-E09) regarding the Covad request for a reduction in the interval for Line Sharing, Line Splitting and Loop Splitting Provisioning from 3 days to 2 days.

Qwest has reviewed this escalation and has determined that this request will not be granted. As Qwest stated in the previous documentation related to the CR denial:

- In the January 15th CMP, Qwest submitted that Installation intervals were agreed to during the ROC TAG forums held in 2001 and 2002. A benchmark was established that matches the current interval in the SIG. Qwest will continue to be consistent with these agreements and meets / exceeds this benchmark consistently.
- Also in the January 15th CMP, Qwest stated that upon reviewing Bell South's Service Interval Guide, Qwest has found that Qwest is already providing a comparable interval to Bell South. Review of online documentation would indicate Qwest offers a comparable three day interval to SBC and Verizon. Additionally, Qwest is not expected to be at parity with other ILECs but rather at parity with Qwest delivered Retail services as defined.
- Also in the January 15th CMP, Qwest discussed that the magnitude of the change was not economically feasible. In the February 19th CMP, Qwest submitted information regarding the negative financial implication of implementing this change.

Therefore, Qwest respectfully denies this escalation request and will continue with the current intervals.

Please contact me by telephone at (303) 896-7020 or by e-mail at wmcampb@qwest.com if you have any questions.

Sincerely,

Bill Campbell
Director Interconnection Services
Qwest