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May 27, 2001

Jessica Elliott
Wayne Knight
Florida Public Service Commission
Legal Services
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850

Re: Docket Nos. 000718, 010198, 010204

Dear Ms. Elliott and Mr. Knight:

The purpose of this letter is to report Qwest Communications, Inc.'s ("Qwest") review of certain matters underlying the Staff's request that dockets be opened for the purpose of considering the initiation of show cause proceedings against Qwest and LCI International Telecom Corp. for alleged violations of Rule 25-4.043, F.A.C., and to propose a means of settling certain issues associated with the opening of the dockets.

Docket No. 010204 was opened to consider the initiation of show cause proceedings against Qwest for apparent violations of Rule 25-4.043, F.A.C.(responses to Staff inquiries). Docket No. 010198 was opened to consider the initiation of show cause proceedings against LCI International Telecom Corp., an affiliate of Qwest, for apparent violations of the same rule. Docket No. 000778 was opened to consider the initiation of show cause proceedings against Qwest for apparent violations of Rules 25-4.118, F.A.C. (unauthorized transfers) and 25-4.043, F.A.C. In this letter, Qwest will address only the aspects of Docket No. 000778 that relate to Rule 25-4.043 F.A.C.

At our request, Staff provided Qwest with a list of the matters which led Staff to pursue the possibility of show cause proceedings. Representatives of Qwest met with Staff on March 8, 2001 to communicate our initial findings and to seek additional clarification of Staff's concerns. As was contemplated during the meeting, Qwest reviewed the circumstances attending the inquiries enumerated on the attached schedule. As Mr. Kirchhof related in his letter to Mr. Moses of March 16, 2001, Qwest agrees that certain responses were untimely.

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Qwest wishes to stress that the untimely responses were not, by any means, a result of any willful disregard for the Commission's authority or requirements. In his letter, Mr. Kirchhof explained that the time, manpower, and energy needed to implement the merger between Qwest and U.S. West strained the resources of Qwest for a period of time. Unfortunately, the demands of that activity were manifested in the form of some untimely responses. As Mr. Kirchhof emphasized in his letter, that experience is now behind Qwest. Further, Qwest recently has taken steps designed to ensure that Qwest (and its affiliates) consistently respond to Staff's needs in a timely fashion. The improvements include the implementation of a process which permits Qwest to receive complaints electronically. This process automatically dispenses an electronic confirmation to the Commission that a complaint was received, including the date and time received as well as the name of the manager who is responsible for answering the complaint. Additionally, Qwest has assigned to a specific individual—Dale Jarell—the responsibility of responding to all complaints received from the Florida Public Service Commission. Qwest believes that dedicating a specific individual to this role will further improve the effectiveness of communication between Qwest and the Commission.

There are indications that these improvements are already taking effect. Qwest's records reflect that all inquiries received by Qwest from the Staff during March and April, 2001 were answered on or before the due date.

Qwest reiterates that it is committed to communicating with Staff effectively and timely. Qwest does not concede that it has committed the type of willful violation that would warrant the imposition of a penalty under governing statutes. That being said, Qwest acknowledges that, while the untimely responses were not willful or intentional in nature, Qwest's performance regarding the timeliness of responses suffered during the period in question. To settle the matter, Qwest offers to pay the amount of \$8,500 to the General Revenue Fund. This offer is made for the purposes of settlement only, and is contingent upon acceptance of the offer of settlement by the Commission as the full resolution of all issues related to the timeliness of the responses of Qwest and LCI to Staff inquiries pending in Docket Nos. 000778, 010204, and 010198, as those issues relate to Rule 25-4.043, F.A.C.

Contemporaneously with this offer of settlement, Qwest is submitting an offer to settle the aspects of Docket 000778 that relate to alleged violations of Rule 25-4.118, Florida Administrative Code. Qwest regards the two offers as separate and distinct. In other words, this offer is not dependent on the Commission's decision with respect to the offer regarding Rule 25-4.118, F.A.C.

Jessica Elliott
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Please contact me if you need further information.

Yours truly,

A handwritten signature in black ink that reads "Joe A. McGlothlin". The signature is written in a cursive style with a prominent loop at the end of the last name.

Joseph A. McGlothlin

JAM/mls
w/Enclosure

cc: Blanca Bayo
Rick Moses
Melinda Watts
Kristen Craig
Peter Kirchof
Mark Pitchford
Kathy Ford