

LAW OFFICES
FARRAR & BATES, L.L.P.

J. Russell Farrar
William N. Bates
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Molly R. Cripps
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Robyn Beale Williams
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Keith F. Blue
Heather C. Stewart
Derrick A. Free
David M. Hannah

211 Seventh Avenue North
Suite 420
Nashville, Tennessee 37219

Telephone 615-254-3060
Facsimile 615-254-9835
E-Mail: fblaw@farrar-bates.com

Of Counsel
H. LaDon Baltimore

*Also licensed in KY

September 15, 2006

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Sara Kyle, Chairman
ATTN: Sharla Dillon
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

**Filed Electronically with the
TRA this date**

RE: Generic Docket to Develop Policy for the Submission and Review of CLEC-to-CLEC
Interconnection Agreements; Docket No. 05-00327

Dear Chairman Kyle:

Enclosed please find the original and four copies of the Comments of Qwest Communications Corporation in the above-referenced docket. A copy of the comments was filed electronically with the TRA this date. Please contact me if you have any questions.

Sincerely,



H. LaDon Baltimore
Attorney for Qwest Communications Corporation

LDB/dcg
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

September 15, 2006

In Re: Generic Docket to Develop Policy for)
the Submission and Review of CLEC-to-CLEC)
Interconnection Agreements)

Docket No.: 05-00327

COMMENTS OF QCC

Qwest Communications Corporation (“QCC”), pursuant to the Tennessee Regulatory Authority’s (“TRA”) Notice requesting comments from interested parties, hereby submits its Comments regarding developing policy and guidelines for the submission and review of CLEC-to-CLEC interconnection agreements. For the reasons explained herein, QCC does not believe that the TRA should promulgate rules to require submission and review of CLEC-to-CLEC agreements.

DISCUSSION

The Telecommunications Act governs the interconnection obligations of telecommunications carriers. The duty to negotiate agreements for the provisioning of services listed under Sections 251(b) and 251(c) is addressed in Section 251(c) of the Act, and this duty is placed upon incumbent local exchange carriers. Similarly, Section 252 sets forth the procedures for negotiation, arbitration, and approval of agreements, however subsections (a) and (b) of that section place that obligation on agreements with an incumbent local exchange carrier (“ILEC”). Section 252 (e) specifically provides for commission review and approval authority of “any interconnection agreement adopted by negotiation or arbitration.”

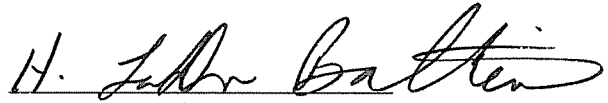
Because the obligation to negotiate or arbitrate under Sections 251 and 252 of the Act applies only to agreements between an ILEC and requesting carriers, only those agreements must be submitted to the commissions under subsection Section 252(a) and (e). Section 251(a) (1) of the Act imposes a general duty on all telecommunications carriers to interconnect and Section 251(b) imposes other duties on all local exchange carriers. However, the requirements and rights under Section 252 apply only to those obligations set forth in Section 251(c), which do not apply to agreements between CLECs. Clearly, the Act places no duty upon either party to a CLEC-to-CLEC agreement to file such an agreement with a state commission.

In addition, the policies underlying the need for regulatory oversight are not existent for CLEC-to-CLEC agreements. In contrast to a need for regulatory review and approval when a utility is a dominant provider and there are no reasonable alternates for the services in question, the services that CLECs provide to other CLECs are representative of services for which there are competitive alternatives and thus do not require and should not be subject to regulatory oversight

CONCLUSION

The Act requires agreements that are entered into pursuant to Sections 251 and 252 are to be submitted and reviewed by state Commissions. CLEC-to-CLEC agreements are not subject to the negotiation and agreement requirements of Sections 251 and 252 and therefore are not subject to review and approval by state Commissions. For the reasons stated, QCC respectfully urges the TRA not to adopt policies or guidelines that require CLECs to submit agreements entered into with other CLECs to the TRA for review.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "H. LaDon Baltimore". The signature is fluid and cursive, with the first name "H." being small and the last name "Baltimore" being larger and more prominent.

H. LaDon Baltimore
Farrar & Bates, LLP
211 Seventh Avenue North
Suite 420
Nashville, TN 37219
615-254-3060
615-254-9835 FAX

Barbara J. Brohl, Senior Attorney
Qwest Services Corporation
1801 California St.
10th Floor
Denver, CO 80202
303-383-6641

Attorneys for Qwest Communications Corporation