

February 27, 2008

Mail Stop 3720

*By U.S. Mail and facsimile to (303) 296-2782*

Stephen E. Brilz  
VP-Deputy General Counsel  
Qwest Communications International Inc.  
1801 California, Suite 5100  
Denver, CO 80202

**Re: Qwest Communications International Inc.  
Definitive Schedule 14A  
Filed March 29, 2007  
File No. 001-15577**

Dear Mr. Brilz:

We have reviewed your February 7, 2008 response to our comments of January 17, 2008. Without more detail, we cannot agree or disagree with your conclusion that you have an appropriate basis to omit the identified performance targets related to the company's overall revenue, net income and cash flow. Since you are in possession of all of the facts related to your disclosure, we have decided that we have no basis to disagree with your decision to omit this information from your filing. As in all cases, we remind you that you are responsible for the adequacy and accuracy of the disclosure in your filings. We do not have any further comments on your filing.

If you have any further questions regarding our review of your filing, please call me at (202) 551-3350.

Sincerely,

Kathleen Krebs  
Special Counsel