

MINIMUM REQUIREMENTS FOR BATCH HOT CUT PROCESS¹

OVERALL

- As an initial matter, because it is based primarily on manual work, the batch process should be recognized as an interim solution with limited opportunities for improvement over the current individual hot cut process. Therefore, to more effectively reduce CLEC impairment, the Commission should develop a plan with specific timeframes to move to an electronic solution that requires fundamental changes to the ILECs' network architecture that currently creates operational and economic barriers to competitive entry to serve mass market customers.
- Any hot cut issue raised by any party that is not solved through the development and implementation of a batch process should be documented for further review by the Commission.

APPLICABILITY/SCOPE

- The batch process must include all mass market customers, all types of loops used to serve such customers and all types of transfers between all LECs. Thus, the process should be insensitive to the identity of the previous carrier and the technology that carrier uses to provide service. In addition, the process should not require CLECs to perform any pre-order activity to "qualify" that an unbundled loop can be migrated. In addition to existing UNE-P customers served over copper and UDLC at a minimum, the process must apply to:
 - IDLC loops
 - UNE-L based line splitting
 - CLEC to CLEC migrations

VOLUME/CAPACITY

- The batch process must support efficient migration of a sufficient quantity of unbundled loops (equivalent to LD PIC changes/UNE-P volumes/churn of ILEC win-backs/CLEC to CLEC) to support a fully competitive mass market at quality levels no less than those achieved when using UNE-P.
- Size of batch
 - The batch should be sized to permit the CLEC and ILEC to achieve cost efficiencies.

¹ Many of the issues identified in this exhibit are currently under discussion between the parties at the Qwest Batch Hot Cut Workshops that begin on December 1, 2003.

- The batch (as well as the number of batches per day) should be sized to accommodate the overall number of migrations required to achieve the scale needed to handle mass volumes.

PROCESS REQUIREMENTS

- The batch process must operate in conjunction with an existing electronic customer acquisition process (*i.e.*, UNE-P).
- The ILEC should provide CLECs the capability to identify which UNE-P customers/lines are eligible for a batch on a mechanized and batch basis (*e.g.*, the CLEC should not be required to do one-by-one prospective queries to determine if the conditions necessary to include a specific line in a batch are or are not met). The ILEC should also establish the electronic ability to provide a specific batch of potential telephone numbers to a CLEC when the conditions for a batch have been met.
- After receiving the notification from the ILEC that the conditions for a batch cut over are met, the CLEC must have sufficient lead-time to advise its customers of the need to reprogram features such as voice mail and speed dialing. .
- The CLEC should have the ability to schedule hot cuts and batch hot cuts at any point in a twenty-four hour day with the costs insensitive to the scheduled time of the hot cut (as in an electronic system such as UNE-P).
- “Batches” should be CLEC specific, *i.e.*, each “batch” should only apply to one CLEC.
- The batch process must be developed to provide equivalent OSS functionality to UNE-P transactions, including:
 - Equivalent electronic pre-ordering and ordering capability
 - Equivalent levels of flow-through for ordering and provisioning systems to increase accuracy and lower costs.
 - Directory Listings must remain as-is when converting from UNE-P to UNE-Loop
- Real-time electronic notification must be available for order status, testing status, and notification of individual loop cut completion.
- The Commission should include in its analysis the feasibility of interim automation of hot cut provisioning as part of the batch process.

CUSTOMER CARE

- There must be a self-executing process to immediately switch customers back to UNE-P if an individual cut fails, with follow-up electronic communication from the ILEC to the CLEC indicating the cause of the failure, how the ILEC will remedy the failure and when the customer can be migrated to an unbundled loop. The rolling interval for affected loops/customers should restart.

ECONOMIC

- The batch process design must result in significant cost reduction for all involved parties.

VALIDATION, TESTING AND QUALITY ASSURANCE

- ILECs must prove they have systemic capability to handle the provisioning of hot cuts at volumes anticipated across all its markets in the absence of unbundled local switching. Therefore, once designed, the batch cut process must be subject to both pre-implementation and post implementation testing. Pre-implementation testing should include third party “time and motion” study of the hot cut process, and third party-monitored ILEC testing using its own collocation and migration of significant numbers of its own customers through hot cuts from direct connection to its switch to its collocation equipment installed to operate as a pseudo-CLEC specifically for this test. Post-implementation “testing” would include on-going commission review to determine if the batch hot cut process meets the needs of commercial mass markets in a manner that permits effective and efficient competition.
- The Commission must direct the ILEC to investigate, report and eliminate any negative impacts of large scale migration from UNE-P to UNE-L from the following:
 - E-911 “unlocks”
 - Number porting
 - Repair databases
 - Billing system migrations, such as from Carrier Access Billing System (“CABS”) to Customer Record Information System (“CRIS”)
 - Provisioning systems such as Trunks Integrated Records Keeping System (“TIRKS”)
 - Directory listing and assistance
- The Commission must direct the ILEC to investigate, report and eliminate any negative impact of large-scale migration from UNE-P to UNE-L on local network interconnection trunking and tandem performance.

- The Commission must direct the ILEC to report at a central office level the current number of working IDLC access lines and the spare parallel copper or UDLC facilities available to migrate these lines to should the IDLC loop customers wish to change their local service provider. It should also provide its plans to provide an unbundled loop when spare parallel copper or UDLC facilities are not available.
- The process must include a method to insure CFA inventories between and among ILECs and CLECs are initially accurate and remain reconciled.
- Competitors must be guaranteed easy access to collocation sites, including the right to use reasonably qualified contractors (*i.e.*, ILEC should not be allowed to dictate the identity of contractors, provided they meet a reasonable skill set)

PERFORMANCE STANDARDS AND ASSURANCE

- Batch cut and other associated loop performance standards should be equivalent to performance for migrating a customer from retail to UNE-P.
- Key performance measurement factors must be in place:
 - Continue to measure at the most granular level feasible for each activity (FOC, rejection, missed appointment, cuts on time, service outage, etc.)
 - Create new measures for key activities unique to batch process, e.g. percentage of batches started on time and completed on time.
 - Eliminate current exclusions in performance measures for projects/batches
 - Create, if not currently in place, measures for percent service outages during conversion, and average recovery time of outages
 - Revise/establish benchmarks to drive performance that protects end-users
- Self-executing financial consequences must be in place for ILEC failures to meet required performance standards. For all conversion service outages, these consequences should be commensurate with the average net revenue times the average life of the customer

Following are additional requirements should the Commission establish only temporary access to UNE-P:

- There must be exceptions to any established time limits that customers may remain in UNE-P “acquisition mode” pending placement into a batch for transition to UNE-L. These include:
 - The time needed to add new CLEC equipment (*e.g.*, DLC in collocation) or to augment CLEC facilities (*e.g.* transport) when the expansion or

augmentation is not complete for reasons beyond its reasonable planning or control

- The time needed to augment collocation space
- Cases of ILEC collocation space exhaust
- The ILEC's inability to migrate customers to UNE-L within prescribed time frames
- ILEC failure to meet non-discriminatory service standards, including increased incidences of customer outages as a result of the manual hot cut process.