Qwest

Qwest Response to Document In Review

Response Date:	**July 17, 2003**
Document:	**Product/Process: Technical Publication #77386 (Interconnection and Collocation for Transport and Switched Unbundled Network Elements and Finished Services)**
Original Notification Date:	**June 17, 2003**
Notification Number:	**NETW.06.17.03.F.01847.TechPub_77386_Update**
Category of Change:	**Level 3**

Qwest recently posted proposed updates to Technical Publication #77386, Issue I, *Interconnection and Collocation for Transport and Switched Unbundled Network Elements and Finished Services* CLECs were invited to provide comments to these proposed changes during a Document Review period from June 17, 2003 through July 2, 2003. The information listed below is Qwest's Response to CLEC comments provided during the review/comment cycle.

Resources:
Customer Notice Archive http://www.qwest.com/wholesale/cmp/review_archive.html
Document Review Site http://www.qwest.com/wholesale/cmp/review.html

If you have any questions on this subject or there are further details required, please contact Qwest's Change Management Manager at cmpcomm@qwest.com.

Qwest Response to Product/Process: Tech Pub # 77386, Issue I Comments

#	Page/Section	CLEC Comment	Qwest Response
1	Page 3-27 Section 3.5.1	***Eschelon*** ***June 25,2003*** Comment: Eschelon would like to submit the following objections to the proposed change. This may have significant impact on the ability of Eschelon to interconnect with other carriers within Large Qwest facilities; carriers that provide the basic backhaul services to Eschelon. The elimination of DS1 regeneration services could adversely affect delivery of services to customers. Page 70 reveals these soon-to-be-deleted paragraphs that describes the situation: "Tie cables that go to DSX 1 and DSX 3 "Design To" point cross connect panels may require	**Tech Pub will not be updated:** Qwest is not eliminating DSX regeneration, but merely changing who is responsible for determining when regeneration is required. The changes in the Tech Pub were driven by this recent change in who is responsible for determining when regeneration is required. More specifically, the CLEC's are no longer responsible for determining if regeneration is required, Qwest is now responsible for that determination. As a result of this change in responsibility, the tech pub is being updated to remove all statements and NC/NCI codes that indicate that the CLEC's need to order regeneration, or are responsible for determining when regeneration is required.

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

		regeneration in some large wire centers to meet the templated signal requirements at the DSX panels. The CLEC must evaluate the need for regenerators using the length and type of tie cables (description provided by Qwest) and similar information about the cables and equipment on their side of the ICDF or DC POTs. Typical maximum lengths are 655 feet for 22 gauge shielded cable for DS1 and 450 feet of 728 type coaxial cable for DS3. Other tie cable types and gauges will be encountered in some wire centers. Further information about cable types and regeneration may be found in Chapter 15." When using the more typical 24 gauge wire for DDSs and 735 coaxial cable for DS3s the distances are 450ft and 225ft respectively. If this change was to occur, certain Eschelon services offered out of Large Wire Centers may have to end, or Eschelon may be forced to purchase more expensive retail products from Qwest to get such services where they are needed. Either way this move is anti-competitive as it increases cost or inhibits CLEC commerce.	NOTE: The state specific SGATs are also in the process of being updated to reflect this new stance on who is responsible for determining when regeneration is required.