

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation Into U S WEST Communications, Inc's))	DOCKET NO. UT-003022
Compliance with Section 271 of the Telecommunications Act of 1996))	
In the Matter of U S WEST Communications, Inc.'s))	DOCKET NO. UT-003040
Statement of Generally Available Terms and Conditions Pursuant to Section 252(f) of the Telecommunications Act of 1996))	
In the Matter of the Second Six-Month Review of Qwest Corporation's Performance Assurance Plan))	DOCKET NO. UT-043007
))	QWEST CORPORATION'S NOTICE OF MODIFICATIONS TO EXHIBIT B AND EXHIBIT K TO THE STATEMENT OF GENERALLY AVAILABLE TERMS AND CONDITIONS

INTRODUCTION

Qwest Corporation ("Qwest") submits an updated Exhibit B to the Statement of Generally Available Terms and Conditions ("SGAT") comprising Version 7.1, which is the

QWEST CORPORATION'S
NOTICE OF MODIFICATIONS

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Performance Indicator Definitions (“PIDs”). Copies of updated Exhibit B are attached.¹ Qwest also submits its revised Qwest Performance Assurance Plan (“QPAP”) Exhibit K for Washington to modify the QPAP, to reflect changes from Long Term PID Administration (“LTPA”) discussions as well as to request determination regarding the tier designation, burn-in, and volume-differentiated benchmark related to the revised PID, PO-20 (Expanded) Manual Service Order Entry, make administrative changes to implement in the QPAP the Commission’s determination in Docket No. UT-033020, Order No. 5 to provide for payments on EELs and modify the requirement for paper monthly reports to exclude Public Counsel from receiving such reports. Attached is the revised QPAP.²

DESCRIPTION OF CHANGES

In support of these notices and motion for approval Qwest states as follows:

These submissions result in part from work during Long Term PID Administration (“LTPA”) sessions where participants identified and agreed upon a number of modifications to the PIDs. Some of those modifications may impact the QPAP. The agreements were reached between Qwest and the CLECs in the LTPA meetings from December 18, 2003 through March 25, 2004 and during the subsequent impasse process. Certain changes described below are administrative. Qwest filed Version 7.0 of Exhibit B on May 6, 2004.

That filing is pending.

A. Changes to Exhibit B appearing in Version 7.1

¹ Qwest is submitting “clean” and “red-lined” versions of Exhibit B, as modified.

² The QPAP can also be found as Exhibit K to the SGAT. Qwest submits a “clean” and redline version of the QPAP, as modified.

1. Version 7.1 of Exhibit B contains changes to PO-2, Electronic Flow-Through and PO-20, (Expanded) Manual Service Order Accuracy.
2. In LTPA, Qwest offered to begin reporting flow-through performance of UNE-P Centrex 21 on a combined basis with UNE-P POTs, which is an existing product category in PO-2. The issue was disputed by one CLEC in LTPA and the issue went to impasse. Recently, Qwest reached agreement with that CLEC and now submits this change as an agreed-upon change. Accordingly, Exhibit B has been updated to reflect that UNE-P POTs and UNE-P Centrex 21 will be reported in PO-2 on a combined basis.
3. Qwest is implementing the new agreed-upon PO-20 in four phases beginning with Phase 1 in May of 2004. Thus, Qwest will begin reporting results for this expanded PO-20 with the May results on the July report. Qwest proposes that Phase 1 be subject to the QPAP beginning with August results that are reported in October 2004 and paid in November or what equates to three months later for the reasons contained below. Further, Qwest proposes that the existing PO-20 contained in Exhibit B-1 remain in effect in the QPAP until the expanded PO-20 becomes subject to QPAP.
4. The current PO-20 contained in Exhibit B-1 describes a manual review of 11 fields on a sample of orders (approximately 900 orders per month) for four products. The expanded PO-20 includes: an electronic evaluation of the universe of eligible orders as well as an increase in the number of additional products and fields; and a “safety net” that encompasses both pre-completion and post-completion activities. The

phased implementation schedule of fields reviewed has been agreed to by the participants of LTPA.

5. Specifically in Phase 1, Qwest will review and measure all service orders within the defined scope of PO-20, creating review of an estimated increase of 1,800% to more than 18,000 service orders per month. During this phase, Qwest will move from a manual review to an automated review. Beginning with Phase 1, the expanded PO-20 measures Resale POTS, UNE-P POTS, Resale Centrex 21, UNE-P Centrex 21, and eight unbundled loop types (Analog, non-loaded 2-wire, non-loaded 4-wire, DS1 Capable, DS3 Capable and higher, ADSL Compatible, XDSL-i Capable, and ISDN-BRI Capable).³ In terms of the number of fields reviewed, each phase adds new fields and field entry combinations. Phase 1 increases the number of fields that are reviewed by 164% over the current measurement. Additionally in this phase, Qwest begins reviewing the accuracy of 205 possible feature codes (universal service order codes – “USOCs”) in the service and equipment (“S&E”) section of the service order for the first time.

6. Phase 2 adds four additional fields and the evaluation of the accuracy of 29 floated fields⁴ after specified USOCs.

7. In Phase 3, Qwest adds the BLOCK field to the PO-20 review. This field establishes various blocking options on a line, such as long distance blocking or 976 blocking. Although it is a single field on the LSR, it can equate to multiple entries on

³ The current PO-20 measures Resale POTS, UNE-P POTS, and two unbundled loop types, analog and non-loaded 2-wire.

the service order. This phase comprises the first of a two step implementation for the BLOCK field.

8. Qwest finishes the expansion of the automated portion of PO-20 in Phase 4 by adding four more fields to the review and completing the second stage of implementation for the BLOCK field. With implementation of this phase, the automated field-to-field comparison will evaluate 39 potential fields, 205 feature codes (USOCs), 29 feature detail codes and a multitude of combinations of these entries on all electronically-submitted, manually-processed LSRs for the products and activity types specified in the definition.

B. QPAP Changes resulting from Version 7.0 of Exhibit B

Included in the May 6, 2004 filing of Version 7.0 of the PIDs was Exhibit B, which will take effect on or before 60 days after its filing, July 6, 2004. There are no changes to the QPAP as a result of this pending filing.

C. Administrative Changes to the QPAP

9. The footnote "c" reference for OP-3 in Attachment 1 referred to a non-existent footnote and was deleted.

10. Recently, Qwest discovered that it had inadvertently failed to make a red-line change to Attachment 1 of the PAP in its compliance filing that was made on February 17, 2004. Qwest had been instructed to apply EELs to Exhibit B and to Exhibit K, consistently with the treatment of EELs in the Colorado PAP. With respect to MR-6, EELs are reported only in subparts D and E. These subparts measure the timeliness of

⁴ Floated fields (FIDs or Field Identifiers) are codes that are sometimes added after the USOC to provide

repair in Interval Zones 1 and 2. Because EELs performance is only reported in MR-6D and MR-6E, Attachment 1 of Exhibit K should have been modified to indicate that only MR-6D and MR-6E apply to EELs. In this filing, Qwest has made the necessary modification.

D. QPAP Changes resulting from Version 7.1 of Exhibit B

Qwest reached agreement with Eschelon on an issue that was disputed in LTPA concerning the reporting of the flow-through performance of UNE-P Centrex 21 in PO-2. The agreement involves combining that product with UNE-P POTS in PO-2, which is an existing product category in that PID. Qwest submitted this change to Exhibit B as an agreed-on change. Since PO-2 product categories do not appear in the QPAP, no wording changes to the QPAP are required or included. As to PO-20 which was also modified by agreement in Exhibit B to add an expanded parallel measure to the existing PO-20 in Exhibit B-1, Qwest requests that the Commission determine the appropriate tier designation, apply a low-volume-differentiated benchmark (to avoid requiring 100% perfect performance in any reporting period), and allow a 3 month measurement stabilization period prior to each implementation phase, and allow Qwest to make a compliance filing that terminates the existing PO-21 in Exhibit B-1 when the first implementation phase for the new PO-20 has concluded. As support for these requests, Qwest states as follows:

11. The PO-20 modifications were discussed by the LTPA in one or more of the weekly LTPA sessions and numerous ad hoc meetings. A number of Staff from various state commissions attended those discussions as well. The parties agreed that

additional information about the service ordered.

QWEST CORPORATION'S
NOTICE OF MODIFICATIONS

Page 6

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these substantive changes would be submitted together after completion of the negotiation sessions, rather than individually as agreement was reached. The version of PO-20 included in the attached Exhibit B was circulated to the LTPA collaborative on June 8, 2004 with comments requested by June 16, 2004.⁵ This email contained the following language: “If comments are not received on or before June 16, 2004, the attached version will be included in Qwest's anticipated Exhibit B filings as the agreed upon PO-20.” One CLEC responded indicating it had no concern with the language. Qwest now submits the attached Exhibit B.

12. However, it should be noted that while the parties reached agreement in LTPA on the PID definition and implementation of the enhanced PO-20, the parties only briefly addressed its treatment in the QPAP during ad hoc LTPA meetings in March 2004. Therefore, Qwest requests that the expanded PO-20 be assigned a tier designation of Tier 1 Low, no Tier 2; a low volume exception for a specific number of orders be applied and that a 3 month “burn in” or measurement stabilization period apply before each phase of implementation before the phase is subject to the QPAP.

13. Given the types of errors captured by PO-20 and the fact that customer impact may or may not result, the designation of Tier 1 low, and no Tier 2, appropriately reflects the importance of these types of errors. The majority of errors that PO-20 will capture are associated with feature-only activity. Feature-only activity order errors do not involve interconnection, switching of customers, collocation, or access to unbundled loops. Even though PO-20 measures orders for inward line activity as well as feature-

⁵ See the Qwest's email to the LTPA, dated June 8, 2004 at 4:43 PM (Denver time).

only activity, most of the errors on the competitively sensitive inward activity (and conversion activity) will be detected and corrected before the due date and thus, result in no end user impact. Appropriately, these types of activities have not risen to anything above a Tier 1 Low designation in any other measure.

14. Additionally, simply because a PO-20 error is identified does not mean that an end user customer will be impacted, or that the impact will necessarily translate to end user customer harm. In fact, PO-20 does not have the capacity to quantify the harm, if any, to an end user customer; it can only quantify the existence of error.

15. Finally, it must be noted that several of the errors that PO-20 is designed to capture will also be captured in other PIDs. For example, if a PO-20 error results in an installation error on an inward-line order, either OP-5A – which measures the percentage of inward line service orders that are free of repair trouble reports – would capture that condition. Alternatively, OP-5B – which measures the percentage of inward line service orders that are free of provisioning trouble reports – would report the error. If the PO-20 error results in incorrect billing, that error will be reflected in BI-3A, billing accuracy results. In the preceding examples, in case of OP-5A and BI-3A, Qwest is already subject to payments to the CLECs for the perceived error.

16. *Volume-Differentiated Benchmark:* A different benchmark for low volumes of orders received is appropriate because Qwest would be held to a standard of perfection if a single order error would otherwise cause the benchmark to be missed. In this case, where the benchmark is otherwise 95%, when a CLEC's order volumes in a particular month are 20 orders or below, the standard should be, "no greater than one order in

error.” Failure to make this volume differentiation will mean that, for order volumes of 20 or fewer orders, Qwest could only satisfy the 95% benchmark if its performance were perfect on every order, which is not reasonable.

17. Measurement Stabilization Period: A “burn in” or measurement stabilization period is appropriate because past experience with respect to implementation of new measures demonstrates that Qwest will need time to test and make adjustments to its systems to ensure that the systems accurately report the measure. There are some elements of the reporting system that simply cannot be evaluated without being in active production. The enhancements and expansion of PO-20 requires systems changes that are not simple and essentially result in two performance measurements during the overlapping reporting timeframe. As a result, the second “new” PO-20 is appropriate for measurement stabilization consistent with Section 16.1 the QPAP, which states in pertinent part that:

...No new performance measurements shall be added to this QPAP that have not been subject to observation as diagnostic measurement for a period of 6 months....

With this filing and pursuant to section 16 of the QPAP, Qwest has modified the QPAP to reflect certain changes. The new PO-20 measurement reporting will begin with May results reported in July. During implementation of Phase 1, reporting will occur on the existing Exhibit B-1 and on the new PO-20 in Exhibit B, Version 7.1. Any required payments will be made under the existing Exhibit B-1 until such time as the measurement stabilization for Phase 1 on the new Exhibit B, Version 7.1 PO-20 has expired. Qwest will then make a compliance filing deleting Exhibit B-1 from its SGAT and deleting references to that version

of PO-20 from the QPAP. Qwest requests that it be granted a three month measurement stabilization for each Phase to adequately assess the measurement's reliability and validate results. For example, the QPAP would apply to Phase 1 beginning in October, 2004 on an ongoing basis. Three months after the implementation of Phase 2, the QPAP would apply to both Phase 1 and Phase 2 on an ongoing basis. This cumulative approach would continue until all four phases are subject to the QPAP.

E. Deletion of Requirement for Paper Reports to Public Counsel

Qwest has modified paragraph 14.2 to delete the requirement that Qwest provide paper copies of its monthly performance reports to Public Counsel. Public Counsel requested this change and Public Counsel has indicated to Qwest that it is satisfied with the access to the data it receives through the company's website. No party has opposed this change.

F. Conclusion

By making this filing in Docket No.UT-003022, Qwest requests that the Commission approve the QPAP, as revised and modified, designate a tier for PO-20, establish a low-volume-differentiated benchmark for PO-20, and allow PO-20 a measurement stabilization for three months with the implementation of each phase, meaning that Qwest will make any required payments for PO-20 on the prior phase or phases, but under Exhibit B-1 for Phase 1 implementation, until the expiration of the three month period.

Qwest requests that the Commission permit the amended Exhibit B to go into effect no later than 60 days after submission in accordance with 47 U.S.C. § 252(f)(3) and, further, upon determination of the issues outlined above and upon a compliance filing by Qwest removing Exhibit B-1 in accord with the accompanying six month review order, supercede Exhibit B-1. In the interim, Qwest will report on the expanded PO-20 contained within

Exhibit B; Qwest will also report and make payments on the existing PO-20 contained in Exhibit B-1 until such time as the Commission determines the appropriate tier designation, measurement stabilization period and whether a low volume differentiated benchmark should apply. Further, Qwest requests pursuant to Section 16 of the QPAP, the changes shall automatically apply to all existing interconnection agreements that currently contain Exhibit B and the QPAP, Exhibit K as exhibits.

REQUESTED RELIEF

Qwest respectfully requests that the Commission permit the amended Exhibit K to go into effect no later than August 25, 2004 in accordance with 47 U.S.C. § 252(f)(3). Attached are a red-lined Exhibit K and a clean Exhibit K for the convenience of the Commission.

Qwest submits this notice in the three dockets captioned above. By submission in QPAP Docket UT-003022 and in SGAT Docket UT-003040 pursuant to section 16 of Exhibit K, the changes shall automatically apply to and modify all existing interconnection

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agreements that currently contain Exhibit K, the QPAP, as an exhibit.

Respectfully submitted this 25th day of June, 2004

QWEST CORPORATION

LAW OFFICES OF DOUGLAS N. OWENS

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QWEST CORPORATION'S
NOTICE OF MODIFICATIONS

Page 12

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CERTIFICATE OF SERVICE

Docket No. UT-003022 and UT-003040

I certify that a copy of Notice of Modifications of Qwest Corporation was deposited in the U.S. Mail on June 25, 2004, to the following parties:

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QWEST CORPORATION'S
NOTICE OF MODIFICATIONS

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** Denotes signed protective agreement

Dated this 25th day of June, 2004.

Douglas N. Owens