BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition by Qwest Corporation to Modify its SGAT	Docket No. QWEST CORPORATION'S NOTICE OF MODIFICATION TO EXHIBIT B TO THE STATEMENT OF GENERALLY AVAILABLE TERMS AND CONDITIONS

1   Qwest submits Updated Exhibit B to the Statement of Generally Available Terms and Conditions

("SGAT"), which is the Performance Indicator Definitions ("PIDs"). Copies of updated Exhibit B

are attached.[1] This submission results from work during the Long Term PID Administration

("LTPA") sessions where participants identified and agreed upon a number of modifications to the

PIDs. These agreements were reached between Qwest and the CLECs in the LTPA meetings from

December 18, 2003, through March 25, 2004, and in one instance, during the subsequent impasse

process.

2   The agreed-upon changes fall into the following categories: new product reporting and/or standards,

association between certain terms in the PIDs to the Definition of Terms, language clarifications, PID

deletion, and PID revisions.

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[1]   Qwest is submitting "clean" and "red-lined" versions of Exhibit B, as modified.

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3   First, new product reporting and/or standards for line sharing, DS1-capable loops and line splitting

were adopted.

- The parties agreed to change the standard for line sharing, in OP-6, from "Diagnostic" to "Parity with retail Qwest DSL" and in, OP-15, from "Diagnostic" to "Diagnostic (Expectation: Parity with retail Qwest DSL)." In addition, through negotiations during the impasse process, the CLECs accepted Qwest's proposal to begin reporting line sharing in PO-2, with a diagnostic standard and to suspend PO-2 benchmark standard discussions until Triennial Review Order ("TRO") issues are resolved.[2]

- The standard in OP-4 for DS1-capable loops is changing from "Parity with retail DS1 Private Line" to "5.5 days" because the installation interval is different between Qwest retail DS1 Private Line and the wholesale DS1-capable loops.

- Agreement was reached during LTPA to report line splitting on a disaggregated basis for OP-3, OP-4, OP-6, OP-15, MR-3, MR-4, MR-6, MR-7, and MR-8.[3] However, in Washington, disaggregated reporting of line splitting for all of the above-mentioned measurements, except OP-15, was added to Exhibit B on February 17, 2004 pursuant to Order No. 5 of Docket UT-033020. In this filing, disaggregated reporting of line splitting for OP-15 is being added consistent with the agreement of the parties in the LTPA. The following standards were also agreed upon: OP-3, 95%; OP-4, 3.3 days; OP-6, Parity with retail Qwest DSL; OP-15, Diagnostic (Expectation: Parity with retail Qwest DSL); and MR-7, Parity with retail Qwest DSL. Standards for MR-3, MR-4, MR-6, and MR-8 and a change to the existing standard of diagnostic for OP-5A are currently at impasse within the LTPA collaborative process. As a result, "TBD" (to be determined) is shown as the standard for MR-3, MR-4, MR-6, and MR-8 since the disaggregation of line splitting is being added to these PIDs. However, OP-5A retains its "diagnostic" standard designation because the disaggregation of line splitting exists in the current OP-5 definition.

4   Second, certain terms that appear in a PID's definition have been associated with its corresponding

explanation in the Definition of Terms. The parties agreed to accomplish this association through a

Hyperlink. A Hyperlink takes the reader of the document to the definition in the Definition of Terms

when the reader either clicks on the term or holds down the CTRL key and then clicks the term. The

first appearance of these terms (Application Date, Business Day, Interval Zone 1/Zone 2, Inward

Activity, Lack of Facilities, MSA/Non-MSA, Projects, Ready for Service (RFS), Ready for Service

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[2]   *See* the CLECs' email to the LTPA stating agreement, dated April 27, 2004 at 12:19 PM (Denver time).

[3]   OP-3 measures installation commitments met; OP-4 measures installation intervals; OP-6 measures delayed days; OP-15 measures intervals for pending orders delayed past due dates; MR-3 measures out of service cleared within 24 hours; MR-4 measures all troubles cleared within 48 hours; MR-6 measures mean time to restore; MR-7 measures repair repeat report rate; and MR-8 measures trouble rate.

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Date (RFS Date), and Repeat Report) are underlined in blue in each of the PIDs where they appear. In the redlined version of the PID, the hyperlink is also shown in blue to distinguish from other types of changes in the PID. In conjunction with the hyperlink of "Inward Activity," the parties agreed to remove some of the language in the applicable PIDs that also appeared in the definition, i.e. "with 'I' and 'T' action coded line USOCs".

5   Third, the parties agreed to clarify certain language on the introduction page i, and in the PIDs BI-1, MR-3, MR-4, MR-5, MR-6, MR-9, BI-3A.[4] Language was changed to increase the clarity, accuracy, or completeness of the PIDs but not to change the meaning of the PIDs. Specifically, they either update information or made certain terms and phrases consistent throughout the PID. For MR-3, MR-4, MR-5, MR-6, and MR-9 where "of receipt" is being replaced by "that Qwest is first notified of the trouble by CLEC," the parties agreed that the time interval begins when the repair trouble ticket is created.

6   Fourth, agreement was reached to delete PO-10, LSR Accountability.

7   Fifth, agreement was reached to revise MR-7, Repair Repeat Report Rate, to more closely tie a repeated trouble report with the initial trouble report. This revision results in the PID being reported one month in arrears to provide the time to identify a repeat trouble report that occurs within 30 days of the initial trouble report (i.e., July's results would be reported in September).

8   Last, the parties adopted language from PO-1 and PO-19 in the Arizona PIDs.[5]

    •   The standards of 25 seconds for the 9th pre-order transaction, Connecting Facilities Assignment, and 30 seconds for the 10th pre-order transaction, Meet Point Inquiry were agreed upon. In the merged PO-1 PID, these benchmarks were stated for Arizona only and "TBD" was the listed standard for the other 13 states. With this PID update the Arizona standards are being adopted region-wide.

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[4]   BI-1 measures the time to provide recorded usage records; MR-5 measures all troubles cleared within 4 hours; MR-9 measures repair appointments met; and BI-3A measures billing accuracy – adjustments for errors – for UNEs and resale.

[5]   PO-1 measures pre-order/order response times; and PO-19 measures the accuracy of SATE, the Stand-Alone Test Environment.

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- The Arizona version has two sub-measures while the version for the other 13 states only had one. The additional sub-measure measures the extent that SATE mirrors production by identifying the percentage of transactions that produce comparable results in SATE and the production environment. The Arizona version is being adopted region-wide.

9   All of these above-mentioned changes were discussed by the LTPA in one or more of the weekly LTPA sessions. A number of Staff from various state commissions attended those discussions as well. The parties agreed that these substantive changes would be submitted together after completion of the negotiation sessions, rather than individually as agreement was reached. Since the last negotiation session took place on Thursday, March 25th, 2004, Qwest now submits these agreed-upon changes.

10   Qwest respectfully 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). Qwest further requests that the Commission deem this revised Exhibit B to modify the SGAT and existing interconnection agreements that currently contain the PIDs as an exhibit.

DATED this _____ day of May, 2004.

QWEST

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