

1 BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

2 Case No. USW -T-00-3

3 In the Matter of US WEST Communications, Inc.'s Motion  
4 for an Alternative Procedure to Manage the Section 271  
5 Process.

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7 STATE OF IOWA  
8 DEPARTMENT OF COMMERCE  
9 UTILITIES BOARD

10 Docket No. INU-00-2

11 IN RE: US WEST COMMUNICATIONS, INC.

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13 DEPARTMENT OF PUBLIC SERVICE REGULATION  
14 BEFORE THE PUBLIC SERVICE COMMISSION  
15 OF THE STATE OF MONTANA

16 Docket No. D2000.5.70

17 IN THE MATTER OF the Investigation Into US West  
18 Communications, Inc.'s, Compliance with Section 271  
19 of the Telecommunications Act of 1996.

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21 STATE OF NORTH DAKOTA  
22 PUBLIC SERVICE COMMISSION  
23 Case No. PU-314-97-193  
24 US West Communications, Inc., Section 271 Compliance  
25 Investigation.

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Docket NO. 00-049-08

In the Matter of the Application of US West  
Communications, Inc., for Approval of Compliance with  
47 U.S.C. ss 271(d)(2)(B).

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1       BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

2               Docket No. 70000-TA-00-599

3   In the Matter of the Application of US West Corporation  
4   Regarding 271 of the Federal Telecommunications Act of  
5   1996, Wyoming's Participation in a Multi-State Section  
6   271 Process, and Approval of Its Statement of Generally  
7   Available.

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7       BEFORE THE NEW MEXICO REGULATION COMMISSION

8               Utility Case No. 3269

9   IN THE MATTER OF Qwest Corporation's Section 271  
10   Application and Motion for Alternative Procedure to  
11   Manage the Section 271 Process

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12       Pursuant to notice to all parties of interest,  
13   Seven-State Collaborative Process, General Terms and  
14   Conditions, Forecasting and BFR Process, was held at  
15   8:35 a.m., June 5, 2001, at 7801 Orchard Road,  
16   Englewood, Colorado, before Facilitator John Antonuk.

17               APPEARANCES

18               (As noted in the transcript.)

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1 basically an organization that consists of the state  
2 regulatory authorities who have jurisdiction over Qwest  
3 service. But I also understand that it was much more  
4 than regulators who participated in the process of  
5 developing performance measures. Can you give us a  
6 brief discussion of who all participated in the process  
7 of exactly defining what measures would be adopted and  
8 what those measures would consist of?

9 MS. ANDERSON: Sure. It all started with  
10 a testing principles and scope workshop that we held in  
11 early December, the 2nd and 3rd, I think, of 1999, in  
12 St. Paul, Minnesota. And at that workshop, the idea  
13 was to set out all of the principles that would guide  
14 the OSS test for the entire beginning, middle, and end  
15 of the test. And so, coming out of that process, that  
16 workshop, we had 20 principles that we agreed upon.  
17 And three of those principles actually applied to  
18 performance measures.

19 And they are -- I have to look up my  
20 notes for this one. No. 5 -- which deals with the fact  
21 that CLECs, and it was U S West, but, of course, Qwest,  
22 should play an active role in developing performance  
23 measures and success criteria. And that they should be  
24 reasonably complete, by the start of the test. So,  
25 that kind of set the overall tone. Number 9, Principle

1 No. 9, talked about the test, including a thorough and  
2 well-documented independent assessment of the data  
3 collection and calculation processes. This is what we  
4 call the audit. So there would be an audit also  
5 completed. And then, Principle No. 17, which dealt  
6 more with the success criterias. And it was agreed by  
7 the parties that the wholesale performance measures  
8 would be compared to analogue retail measures, wherever  
9 possible, and then where not possible, benchmarks of a  
10 fixed nature would be developed. And so those are the  
11 three that are, today, in the Master Test Plan, in  
12 Section 3, amongst other places, but you can find them  
13 there easily.

14 MR. ANTONUK: And can you estimate for us  
15 how many CLECs participated in the process of  
16 establishing the performance measures?

17 MS. ANDERSON: Even before this workshop,  
18 to some degree, this testing scope and principles  
19 workshop, because what we did was send out draft  
20 principles with the request for comment. And they  
21 submitted comments as appropriately, and we dealt with  
22 those comments in the first workshop. So, pretty much,  
23 from the beginning of the workshops, and prior to that,  
24 we did have quite a bit of discussion in our TAG calls,  
25 which is our Technical Advisory Group calls -- since

1 September/October, I guess, of 1999, we have had pretty  
2 much weekly TAG calls. And so, participation in  
3 Arizona was discussed in those TAG calls. Our denial  
4 of access was discussed in those. So, parties have  
5 been involved, pretty much, from the very beginning.

6 MR. ANTONUK: Okay. And when you began  
7 the work to develop the measures, did you begin by  
8 addressing the issues of how you would proceed, what  
9 your administrative rules would be, how the ROC process  
10 would be governed? In other words, kind of what you  
11 did to sort of set up your administrative and  
12 governance way of proceeding before you began to  
13 develop the measures specifically.

14 MS. ANDERSON: Okay. In terms of  
15 governance, the overall governance processes for the  
16 ROC were pretty much established during the formative  
17 stages, when the ROC, particularly Commissioner Rowe  
18 and his folks, were approaching U S West at the time  
19 and they were agreeing; that there were letters back  
20 and forth, and that sort of thing. And then the ROC  
21 had made proposals on the governance, and those were  
22 pretty well generally accepted by the parties. So the  
23 governance process was all done somewhat upfront.

24 And the key elements are that there's a  
25 TAG, which is the major collaborative forum for the

1 members participated in the first workshop. In  
2 addition to that, we had regular TAG calls, as I have  
3 indicated. And oftentimes there would be agenda items  
4 related to whatever the important issues were, be it  
5 PIDs or other testing topics. So, it was and continues  
6 to be a fairly lively collaborative, if you will, of  
7 participation.

8 MR. ANTONUK: Can you discuss for us a  
9 little bit about how the intervals of OP-4 were set,  
10 what kind of information was generated? How that  
11 information was used and the process by which you came  
12 to some decision about what intervals should be  
13 reflected in that particular measure?

14 MS. ANDERSON: Well, intervals associated  
15 with OP-4 were not really handled any differently than  
16 any other PID type of process. You know, I mentioned  
17 that we had the first workshop in January. At that  
18 workshop, we ended up scheduling some additional  
19 workshops and some tutorial calls to help bring all of  
20 the parties, CLECs as well as state staff and some  
21 Qwest folks up-to-speed on what the various performance  
22 measures were. And then we added a couple of  
23 additional workshops, and throughout all of these, the  
24 process that was followed was that there would be a  
25 proposed set of performance measures. We took them one

1 at a time, identified areas that we could reach  
2 agreement on, that all of the parties agreed. We  
3 identified areas at issue and we documented those  
4 issues. They were worked on an ongoing basis. Updated  
5 mostly weekly, but sometimes not weekly. It would  
6 depend on the next step in each issue resolution  
7 process. And OP-4 was handled in that fashion.

8         Now, OP-4 actually measures the actual  
9 interval. And so, you know, the way the intervals are  
10 established, to my understanding of OP-4, is the  
11 Standard Interval Guide is utilized, or if there are  
12 interconnection contracts or terms in a contract that  
13 supersede those, those are used for specific CLECs, if  
14 that applies. And so the original due date is  
15 established using those either contract terms or the  
16 Standard Interval Guide. And then, with the principles  
17 that I mentioned, when we look at the success criteria  
18 for OP-4, the primary success criteria for OP-4 would  
19 be retail parity. In the discussions the parties came  
20 up with actually three types of success criteria in  
21 OP-4. By far, if you look at them, the majority are  
22 all retail parity with some kind of analogue retail.  
23 There was lots of discussion on what was appropriate,  
24 what was the appropriate analogues for all of the  
25 various service breakdowns -- product and service

1 breakdowns.

2           Then there were three that ended up being  
3 benchmarks for OP-3, and those were, I think, the  
4 analogue loop, two-wire nonloaded, and aDSL-qualified.  
5 And those originally were agreed -- there was a lot of  
6 back and forth. I think they started out maybe at ten,  
7 if I remember correctly. There was a lot of back and  
8 forth on those as well as what was appropriate for  
9 retail analogue, for some of the others.

10           And in the end, it was agreed, I believe  
11 in June, the June 8th TAG of 2000, Qwest made a  
12 proposal of six days for high density areas for those  
13 three that I mentioned, and seven days for low density.  
14 And that was considered for the following week. And at  
15 the next TAG, on June 15th, that was agreed upon for  
16 those three kind of loops. So, it was six and seven  
17 days for high/low respectively. And that lasted until  
18 approximately, I think it was late November, November  
19 30th, where there had been lots of concern expressed by  
20 the various commission staff, particularly commission  
21 staff that are in states that are all low density  
22 areas, and this concept of differing service levels for  
23 differing jurisdictions, or whatever. Anyway, there's  
24 a lot of concern expressed. In the end, Qwest proposed  
25 to change the low density seven-day benchmark for OP-4



1 to low density six days, to the same. So, there would  
2 be no difference between high and low density in terms  
3 of benchmarks for those three types. And to my  
4 knowledge, that is where it stands today.

5         There's also four diagnostics, I think,  
6 which are primarily new services, like dark fiber,  
7 line-sharing, and a couple of others, subloop  
8 unbundling.

9         MR. STEESE: EELs.

10        MS. ANDERSON: EELs. Just seeing if you  
11 were listening.

12        MR. ANTONUK: Okay. Okay. Those are the  
13 all the questions I have. Anybody from any of the  
14 state commission staffs want to ask some questions  
15 before we allow other participants the opportunity?  
16 Apparently not. Any other --

17        MS. RILEY: Maryanne Riley from New  
18 Mexico advocacy staff. Has there recently been a  
19 change in the estimated completion date for the OSS  
20 tests?

21        MS. ANDERSON: Yes, there has been. At  
22 the last Wednesday project managers meeting, the final  
23 report date was changed from August 31st to October  
24 12th.

25        MS. RILEY: Thanks.

1 MR. ANTONUK: Any other questions from  
2 any source? Mr. Finnegan.

3 MR. FINNEGAN: John Finnegan with AT&T.  
4 Did the TAG ever formally approve any of the specific  
5 Qwest standard intervals contained in the Qwest Service  
6 Interval Guide?

7 MS. ANDERSON: Not to my knowledge, other  
8 than these three specific ones that happen to be in the  
9 Standard Interval Guide, but were related to OP-4.

10 MR. FINNEGAN: Well, the --

11 MS. ANDERSON: Not that I know of any of.

12 MR. FINNEGAN: The OP-4-related numbers,  
13 would you characterize those as benchmark or standard  
14 intervals?

15 MS. ANDERSON: Well, in the PID  
16 application, they would be benchmarks. But I think, in  
17 this situation, they also happen to be the standard  
18 interval.

19 MR. FINNEGAN: Well, isn't it true that  
20 the benchmarks in the ROC PID is expressed as an  
21 average?

22 MS. ANDERSON: Yes. That's what OP-4  
23 measures, the average installation.

24 MR. FINNEGAN: Is it true, then, that the  
25 standard interval is an average in the Qwest Standard

1 Interval Guide?

2 MS. ANDERSON: In the Standard Interval

3 Guide?

4 MR. FINNEGAN: Yes.

5 MS. ANDERSON: I am not sure. I don't

6 know the answer to that question. I would have to -- I

7 think it would be the target standard interval applied

8 to an order. Hopefully, the average would be near

9 that. But is it actually an average in the Standard

10 Interval Guide? I don't know.

11 MR. FINNEGAN: Would it be fair to

12 characterize the standard intervals as aspiration?

13 MS. ANDERSON: Yes, I think so.

14 MR. FINNEGAN: And the benchmark, in

15 terms of the ROC OSS test at least, the benchmark is

16 considered the pass-fail criteria, or one of the key

17 pass-fail criteria for the particular services?

18 MS. ANDERSON: Yes, as applied to this,

19 the pseudoCLEC in the OSS test.

20 MR. ANTONUK: John, I missed the first

21 part of your question. What's the pass-fail criteria?

22 MR. FINNEGAN: The benchmark. That the

23 standard intervals are aspirational, and there's no

24 obligation for Qwest to meet the standard interval,

25 per se. The benchmark is an average. It's an

1 absolute. You either make it or you don't. Stare and  
2 compare, it's been characterized.

3 MR. ANTONUK: Thanks. I am sorry. I  
4 just -- I missed your first part there. I got off on a  
5 totally different track. Thanks for bringing it back.

6 MR. FINNEGAN: In either the TAG  
7 discussions or the workshops on performance  
8 measurements, workshops related to the OSS test, did  
9 Qwest ever introduce their Standard Interval Guide and  
10 the specific Qwest standard intervals for TAG approval?

11 MS. ANDERSON: Not to my knowledge. I  
12 think I would remember that if it was done. I could  
13 follow-up and check on all my notes and things and  
14 check the Website, but I don't believe so.

15 MR. FINNEGAN: Do you believe that the  
16 ROC TAG controls the specific intervals in the Qwest  
17 Service Interval Guide?

18 MS. ANDERSON: The ROC TAG?

19 MR. FINNEGAN: Yes.

20 MS. ANDERSON: I don't believe so, no;  
21 however, to the extent that there is something like  
22 these three loop types, where we -- there happens to  
23 be -- no, the parties couldn't agree on retail analogue  
24 in the PIDs. It's coincidental, I guess, that we also  
25 have an average interval shown as a benchmark.

1 dry. It's never that simple. It's a little more  
2 symbiotic. I think, in general, the standard intervals  
3 are the standard intervals, and contract terms are  
4 contract terms. If something changes, they would be  
5 reflected in the PIDs. In the case of these few that  
6 we're talking about, it's hard to say. I don't know.  
7 My guess is they are separate and the PIDs would  
8 follow, but I am not positive.

9 MR. FINNEGAN: Are you aware that Qwest  
10 introduced a new -- I am not sure if it's a new  
11 service, but -- or an interval for existing service  
12 called, "quick loop," that appears to apply to analogue  
13 loops, that the standard interval for that is three  
14 days, I believe. Are you aware of that?

15 MS. ANDERSON: Yes. I have heard that  
16 term, and I am aware of it. I am not sure if there's  
17 restrictions on what would qualify for quick loop. I  
18 haven't investigated that.

19 MR. FINNEGAN: So, in your opinion, would  
20 that, based on your previous testimony, require an  
21 automatic reduction in the benchmarks for OP-4?

22 MS. ANDERSON: Is it a separate product  
23 called "quick loop"?

24 MR. FINNEGAN: My opinion is it's a  
25 different interval for analogue loops, under certain

1 MS. LISTON: The way that the process  
2 works is -- and it's a combination of issues. But in  
3 the Standard Interval Guide, or in the CLEC contract  
4 are the minimum requirements for due dates. So, Qwest  
5 would put forth -- the CLECs have the list of what the  
6 standard intervals are. When the LSR is issued, the  
7 CLEC has the option of either asking for the standard  
8 interval, the minimum -- the minimum length or a longer  
9 than standard interval. To the extent that the CLEC  
10 requests the minimum, the standard interval, that order  
11 would then carry that as the due date. That goes back  
12 to what Denice was referring to. It's an original due  
13 date. So, that would come in with the five-day  
14 interval, for analogue loop, or if it was -- it met the  
15 criteria for quick loop, with a three-day interval, if  
16 the CLEC wanted three-day interval. Once the CLEC put  
17 that due date on the LSR, if it's in conjunction with  
18 the Standard Interval Guide minimum due date, Qwest  
19 will not change that due date. That is the due date  
20 that's measured from, in terms of -- for the OP-3.

21 MR. FINNEGAN: If the standard interval,  
22 from a PID perspective, if the standard interval was  
23 five days, and the CLEC requested five days --

24 MS. LISTON: Right.

25 MR. FINNEGAN: Qwest provided a

1 commitment date of six days.

2 MS. LISTON: We don't do that. We don't  
3 change. There are no provisions where we take that and  
4 lengthen that interval.

5 MR. FINNEGAN: Can you point me to the  
6 PID language that says if the CLEC requests standard  
7 interval, CLEC will always get a commitment that is the  
8 standard interval? Or SGAT language. Can you point me  
9 to SGAT language that indicates, if the CLEC meets the  
10 conditions, that we would get a standard interval --  
11 that the CLEC will get the standard interval.

12 MR. STEESE: John, it's throughout the  
13 SGAT. It says in the SGAT, if the CLEC requests --  
14 name your product. It could be analogue loop -- they  
15 will get the interval set forth in Exhibit C, which is  
16 the SIG. So they will get three days, or they will get  
17 five days.

18 So it says it explicitly, in the  
19 contract, that's what Qwest will provide. In fact,  
20 that is the process that Qwest has very explicitly set  
21 forth.

22 MS. LUBAMERSKY: John, the choice that I  
23 believe was brought up in discussions of the PIDs, if,  
24 for some reason, Qwest can't make the five-day due  
25 date, we issue a jeopardy, we say we're not going to

1 make the five-day commitment, we count that as a miss  
2 in OP-3, then attempt to make the new interval and  
3 reFOC that. That was discussed in making sure that, in  
4 OP-3, we provide the standard interval, or the longer,  
5 if requested. Anything other than that counts as a  
6 miss.

7 MR. ANTONUK: Let me tell you my  
8 recollection of what the PID says, with a little bit of  
9 help, and see if I am missing something. The  
10 term-of-art in OP-4 is, "due date" which is a term  
11 that's not defined in OP-4. At the end of the PIDs,  
12 there is a set of definitions. One thing that is  
13 defined is "standard interval." That definition is:  
14 "The interval that ILEC publishes as a guideline for establishing due dates for provisioning of  
service requests. Typically due dates will not be assigned intervals shorter than the standard.  
These intervals are specified by service type and type of  
15 service modifications requested. ILECs publish these standard intervals in documents used by  
their own service representatives as well as ordering instructions provided to CLECs in the Qwest  
Standard Interval Guidelines."

16 Another defined term, defined meaning  
17 included in the definition section, at the end of the  
18 PIDs, is due dates, which is defined as, "The date  
19 provided on the Firm Order Confirmation the ILEC sends  
20 the CLEC identifying the planned completion date for  
21 the order." That's all I found in the PIDs that's  
22 relevant to the questions that are being raised. Is  
23 anybody aware of any other PID provision that applies?  
24 I know we also have the SGAT to talk about.

25 MR. STEESE: I would direct -- I don't



1 up in the TAG, would you agree that specific situation  
2 will be a case of the benchmark following a change in  
3 the standard interval?

4 MS. ANDERSON: If the change was made for  
5 the benchmark, yes.

6 MR. FINNEGAN: You had referenced the ROC  
7 TAG meeting minutes from the conference call on June  
8 15th, 2000, and read a portion of the meeting minutes  
9 on this specific issue. I would like to read the  
10 entirety of the meeting minutes on this issue, then ask  
11 a specific question to your interpretation of the one  
12 statement. This is Issue No. 109:.  
13 "Agreement was reached on this issue and it is now closed. OP-3 will use 90 percent as the  
14 benchmark and OP-4 will use mid-range six day for high density, and seven day for low density,  
15 subject to changes in the interval guide."

16 Then the rest of the statement is the  
17 same as you had read:

18 "Once data is available in Q2, 2001, the intervals will be adjusted. This item will be open on the  
19 future discussion topic list."

20 Now, that statement: Six day for high  
21 density and seven day for low density, subject to  
22 changes in the interval guide." What's your  
23 interpretation of what the phrase, "subject to changes  
24 in the interval guide" means with respect to the  
25 benchmarks?

26 MS. ANDERSON: I think the benchmarks --  
27 I think the intervals in the interval guides for those  
28 loop types were higher prior to reaching an agreement

1 on this benchmark for the same three loops. And I  
2 think that's part of the back and forth that went on in  
3 the -- a lot of the subteam discussions and the TAG  
4 discussions about resolving OP-3 and 4.

5           So, I think, in this particular case, the  
6 standard interval was one thing. And in order to close  
7 on the OP-3 and 4 measures, the parties reached a  
8 compromise which impacted the Standard Interval Guide.  
9 It's kind of the flip of the other example. That's my  
10 understanding. If the --

11           MS. LISTON: One of the other things that  
12 happened, that I think influenced the interval, is  
13 there was discussion regarding what the actual  
14 intervals were. And at one point in time, the two-wire  
15 nonloaded loops had intervals six, seven and eight  
16 days. And, of course, the benchmark was set at the  
17 seven-day mark. During the negotiations with the  
18 parties, those intervals were actually changed. And  
19 the two-wire nonloaded loop intervals changed to match  
20 the analogue loops of five, six and seven days. So,  
21 during the process of going back and forth, the actual  
22 intervals in the Standard Interval Guide were changed  
23 and then reflected the same as analogue loops.

24           MR. STEESE: That was as a direct  
25 relation to what occurred at the ROC?

1 MS. LISTON: That was my understanding.

2 MS. LUBAMERSKY: It was a compromise in  
3 order to get closure on six days. Qwest agreed to  
4 change the Service Interval Guide. There wasn't an --  
5 it had to be done because we made the compromise, but  
6 in order to get the CLEC agreement, we decreased the  
7 interval for all two-wire nonloaded loops.

8 MR. FINNEGAN: One more question. The  
9 last statement in the minutes talk about, "This item  
10 will be open on the future discussion topic list." Has  
11 that ever been discussed?

12 MS. ANDERSON: I think, if I remember  
13 correctly, that it talks about doing it after the  
14 second quarter of 2001, which is kind of where we're at  
15 right now.

16 MR. FINNEGAN: Final question. Do you  
17 think CLECs --

18 MS. ANDERSON: Here we are revisiting it,  
19 so we're right on schedule.

20 MR. FINNEGAN: Good segue. Do you  
21 believe the CLECs are precluded from talking about  
22 standard intervals in any forum, other than the ROC OSS  
23 test?

24 MS. ANDERSON: Do I believe the CLECs are  
25 precluded?

1 MS. DeCOOK: I think that's the same  
2 problem in terms of speculation about what the CLECs  
3 knew and what they didn't know. I mean you can ask  
4 what the order says, but --

5 MR. STEESE: I am asking something very  
6 different. Was that the understanding of the people in  
7 the room, in your opinion, as one that's been  
8 overseeing this process?

9 MS. DeCOOK: Same objection.

10 MR. ANTONUK: Yeah. I am going to allow  
11 the question, but remind you that you are not required  
12 to speculate. If you are not comfortable answering  
13 from your own knowledge, then "I don't know" is  
14 perfectly fine.

15 MS. ANDERSON: Well, I don't know the  
16 answer to that question, but I would like to say that I  
17 believe that all of the parties that were trying to  
18 determine benchmarks were trying to set benchmarks that  
19 would be -- of course, with compromise you can't always  
20 get what you want, or you don't ever get it done. But  
21 the whole intent was to get reasonable benchmarks that  
22 gave CLECs the opportunity to compete. Now, that was  
23 my understanding of what we were trying to do. I don't  
24 want to speak about everybody's motive or understanding  
25 outside of that, but that's certainly was what I was

1 trying to do.

2 MR. STEESE: Fair enough. Then with  
3 respect to setting of the benchmarks for OP-4, where  
4 the six days across the board was eventually set, was  
5 Qwest's Standard Interval Guide and the intervals Qwest  
6 provides loops, was that discussed during the course of  
7 setting those benchmarks?

8 MS. ANDERSON: Not specifically, like we  
9 brought this, the Standard Interval Guide in and  
10 started going through it or anything. It was more as  
11 something that was being considered in setting the  
12 benchmarks because just for example, this is either 6  
13 to 19 circuits, or whatever. We kind of, when we would  
14 talk through things, we kind of targeted that middle  
15 one, so you knew what you were talking about, otherwise  
16 you were -- you are talking about all of the different  
17 increments and it was difficult. By inference and  
18 reference they were discussed, but they were not, to my  
19 knowledge -- recollection or knowledge or notes, we had  
20 never brought the entire Standard Interval Guide in and  
21 sat down and went through it.

22 MR. STEESE: That's not what I was  
23 asking. What I am asking is when the interval -- the  
24 benchmark, excuse me, for OP-4 was set, was the  
25 interval that Qwest offered loops, at that point was

1 that interval discussed in setting the benchmark? Not  
2 was the whole Standard Interval Guide brought in.

3 MS. ANDERSON: Yes, I am sure the, if I  
4 remember correctly, I don't have it in front of me, but  
5 I want to say it was 9 or 10 days originally and so,  
6 there a was lot of back and forth. Clay Deanhardt, who  
7 was with Covad at the time, was very interested and in  
8 that there was a subgroup that met. It was a lot of  
9 back and forth. So, it was definitely discussed.

10 MR. STEESE: And on the retail parity  
11 side, you are moving away from the analogue aDSL  
12 compatible and two-wire nonloaded loop -- no. Just a  
13 moment. On the retail side, the expectation was the  
14 interval given to the CLEC or performance given the  
15 CLEC would be statistically the same; is that correct?

16 MS. ANDERSON: Do you mean statistically  
17 the same or do you mean the --

18 MR. STEESE: The same with statistical  
19 overlay.

20 MS. ANDERSON: Okay. Yeah, there was a  
21 lot of -- yeah, that was the expectation, although  
22 there was even compromise in that because, at first,  
23 Qwest proposed what they thought was the appropriate  
24 retail analogue for the wholesale types. And then we  
25 had a lot of discussion -- in some cases we even went

1 through and said, okay, how do you spend these ten  
2 days. And we looked at every engagement of work in the  
3 interval to get to the 10 days. And so there was a lot  
4 of back and forth on that, and some of the original  
5 proposed retail analogues were changed and eventually  
6 agreed upon.

7           And I should note one thing. In this  
8 process, there was never an impasse issue on either  
9 OP-3 or OP-4. We never reached impasse. Out of 50  
10 PIDs, approximately, with, I would say, several 100  
11 probably approaching 500 or 600 submeasures, we went to  
12 impasse three times, until last week when we went to  
13 impasse a fourth time. But, you can see, there was a  
14 lot of -- the reason I mentioned this, it's very  
15 relevant to all compromises. We talked about  
16 everything and a lot of times things were put on the  
17 table, taken off, and then they had a way of showing up  
18 again. So, I just mentioned that because the retail  
19 analogues, in particular, for OP-4 was back and forth,  
20 I would say, literally, for months. It was a champagne  
21 time when we agreed on that.

22           MR. STEESE: That's all of the questions  
23 I have, Mr. Antonuk.

24           MR. ANTONUK: Peggy Egbert.

25           MS. EGBERT: Could you please explain

1 particular PID. Is that what was agreed to?

2 MS. ANDERSON: Yes. That PID measure is  
3 average installation intervals. So, it was a benchmark  
4 for average, correct.

5 MS. DeCOOK: What wasn't agreed to is  
6 what particular service interval Qwest would be  
7 required to -- or a CLEC could put down on the LSR, and  
8 Qwest would commit to providing to the CLEC; is that  
9 fair?

10 MS. ANDERSON: Are you talking about for  
11 those three loop types?

12 MS. DeCOOK: Right. Have you seen the  
13 Service Interval Guide for those three loop types?

14 MS. ANDERSON: Yes.

15 MS. DeCOOK: Isn't it true, for those  
16 three loop types, there are shorter and longer service  
17 intervals than the PID benchmarks?

18 MS. ANDERSON: I don't know. I don't  
19 think so. At the same quantity of loops. I would have  
20 to look at that. Just a moment. Okay. Two-wire  
21 analogue. For 9 to 16 lines is six business days.  
22 They jive.

23 MS. DeCOOK: What about 1 to 8?

24 MS. ANDERSON: Well, 1 to 8 is five,  
25 but --



1 MS. DeCOOK: Right.

2 MS. ANDERSON: What my point was, if you  
3 remember, I mentioned the 9 to 16 when we were going  
4 through the compromise. And in all of the discussions  
5 and negotiations, we usually focussed in on the 9 to 16  
6 to talk about things, until it got resolved. That's my  
7 only point.

8 MS. DeCOOK: I appreciate that. But  
9 there are, for different quantity of loops, there are  
10 different service intervals than the average PID that's  
11 reflected in OP-3?

12 MS. ANDERSON: Correct.

13 MS. LUBAMERSKY: I think it's important  
14 to remember the note that Ms. Anderson made, that the  
15 convention of the TAG was we did the mid-point range.  
16 We all had lengthy discussions that there was five days  
17 for 1 to 8, six days for 9 to 16. And we captured six  
18 days in OP-4. But in no way did that discount the  
19 commitment as defined in the SIG of what a standard  
20 interval was, and in no way did it take anything away  
21 from Qwest's commitment to make the five-day interval  
22 for 1 to 8 loops, six days for 9 to 16, et cetera.

23 MR. FINNEGAN: John Finnegan. On that  
24 Issue 109 agreement, I think we can all agree that  
25 there was agreement on what the benchmarks should be

1 for those loop types. Would you say that agreement  
2 included an agreement on what the standard interval  
3 should be for those three loop types for all of the  
4 quantities of services ordered?

5 MS. ANDERSON: No. I think it pertained  
6 mainly to 9 to 16.

7 MR. FINNEGAN: So, are you saying that  
8 agreement was on what the benchmark should be, and what  
9 the standard interval should be for 9 to 16 loops of  
10 those various loop types?

11 MS. ANDERSON: I think it was a package  
12 deal. That's my understanding and recollection. Yeah.  
13 It was -- the group was setting benchmarks, but in this  
14 case, to get the benchmarks set, I believe Qwest had to  
15 agree to a shorter interval on 9 to 16, and they did,  
16 to be able to close. That's my understanding. And I  
17 never heard anything any different from anyone else.

18 MR. FINNEGAN: If a party wanted to  
19 change to the 9-to-16 standard interval -- 9-to-16  
20 loops standard interval, would it matter if it were in  
21 the ROC or in, say, in the unbundled loop workshop, in  
22 a future multi-state cooperative?

23 MS. ANDERSON: From my perspective, it  
24 would not matter. What would matter is if it was  
25 changed, and if someone brought to the ROC a proposal