BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation Into U S WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996	Docket No. UT-003022
In the Matter of U S WEST Communications, Inc.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996.	Docket No. UT-003040 QWEST CORPORATION'S PERFORMANCE DATA FOR WASHINGTON [July 2000 – June 2001]

Qwest Corporation ("Qwest") hereby provides the Washington Utilities and Transportation Commission (the "Commission") with an overview of its performance data detailing how Qwest is providing interconnection, unbundled network elements ("UNEs"), and resale to CLECs throughout the State of Washington. The Commission Order in Docket Nos. UT-003022 and UT-003040 Addressing Workshop One Issues: Checklist Item Nos. 7, 9, 10, 12, 13, issued June 11, 2001 ("Workshop One Order"), included a requirement that Qwest "submit to the Commission the audited results of performance testing relating to Checklist Item Nos. 7(i), 7(ii), 8, 9, 10 and 13 and associated testimony concerning the

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audited results as soon as the results are available."[1] This filing includes results for those checklist items as follows:

- Checklist Item No. 7(i): see pages 45-47
- Checklist Item No. 7(ii): see pages 45-47
- Checklist Item No. 8: see page 47
- Checklist Item No. 9: see page 48
- Checklist Item No. 10: see page 48
- Checklist Item No. 13: see page 50

This filing also discusses performance results for every other checklist item for which the Regional Oversight Committee ("ROC") has adopted performance measures. The ROC retained the Liberty Consulting Group ("Liberty") to audit the measures used to evaluate Qwest's wholesale performance. Liberty's Performance Measurement Audit ("PMA"),[2] which is now essentially complete, found that Qwest's "performance measures accurately and reliably report actual Qwest performance."[3]

Qwest presents this data on a checklist item by checklist item basis for ease of review.[4] The FCC has held that "the most probative evidence of nondiscriminatory access to interconnection and UNEs is actual commercial usage."[5] Qwest anticipates making similar performance data filings at least every month until completion of the OSS test, and until it files its Washington 271 application with the FCC. It is Qwest's understanding that the FCC will review the prior four months of performance data when Qwest files its 271 application. Thus, it is appropriate for the Commission to begin reviewing Qwest's performance data at this time

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[1] Workshop One Order, ¶ 93.

[2] A copy of Liberty's Report on the Audit of Qwest's Performance Measures dated July 11, 2001 ("Liberty Report") is attached as Exhibit 1.

[3] *See* Exhibit 1 at 2-3.

[4] This is the first report filed by Qwest in the checklist format. The performance results will continue to be available in the original format (organized by PID number) as well as the new format (organized by checklist item) on a going-forward basis at the Qwest web site: http://qwest.com/wholesale/results/roc.html.

[5] *Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) and Verizon Global Networks, Inc., for Authorization to Provide In-Region, InterLATA Services in Massachusetts*, CC Docket 01-9, Memorandum Opinion and Order, ¶ 12 (April 16, 2001) (*"Verizon Massachusetts Order")*; *Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, Memorandum Opinion and Order, FCC 99-404, ¶ 53 (December 22, 1999) *("Bell Atlantic New York Order")*.

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The volume and in some cases the complexity of the performance results will most likely generate a number of questions from the Commission and other interested parties. Qwest respectfully requests that the Commission schedule this item for presentation at a future open meeting or special meeting with the Commissioners in attendance to allow time for questions and comments. The Commission currently has two workshops (one on September 19 and the other on October 18 and 19) scheduled with the industry that may include a number of participants that would be interested in such a proceeding.

In addition, Qwest will continue to participate in the ongoing OSS test by Hewlett-Packard, the pseudo CLEC. Qwest will report the results of the test upon completion. It is not necessary for the Commission to delay review of the performance data until completion of the OSS test. While important, the OSS test results do not substitute for actual performance data. The OSS test results are most important where significant volumes of state specific performance data are not available.

I. EXECUTIVE SUMMARY

A. Overview

Over the past several months, Qwest, CLECs and the ROC's Technical Advisory Group ("TAG") members (including Commission Staff) have been engaged in a number of processes, all intended to address Qwest's compliance with Section 271 of the Telecommunications Act of 1996. These processes have included an unprecedented regional OSS Test, a series of checklist workshops, regional workshops to develop performance indicator definitions ("PIDs"), and regional development of Qwest's Performance Assurance Plan ("QPAP") to ensure that Qwest continues to perform at a satisfactory level once it enters the interLATA market. These processes were created to ensure that every aspect of Qwest's 271 Application would be addressed in at least one forum.

The FCC has given clear guidance on the standards that ILECs such as Qwest must satisfy to meet Section 271. As to each checklist item, Qwest must establish that it has a

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"concrete legal obligation" to provide it and is able to provide the checklist item at an "acceptable level of quality."[6] Checklist workshops have addressed the first prong of this test through discussion and revision of the SGAT. The second prong of this test – acceptable level of quality – requires that Qwest meet the "3-Ps:" ***process, PIDs and performance***. In other words, Qwest must have (1) a process to make each checklist item available, (2) in most instances, performance metrics (the PIDs) to track performance for checklist items and (3) actual performance data under the PIDs showing Qwest is successfully providing each checklist item in commercial settings.[7]

The purpose of this document is to address the last of the 3-Ps, actual commercial performance. Throughout checklist item workshops, Qwest has presented its commercial data describing how well it is making checklist items available to CLECs. This data has been discussed in workshops to varying degrees depending on the checklist item. The CLECs uniformly argued that it should not be discussed because the data was not yet audited. In that regard, the ROC retained Liberty to verify, among other things, that Qwest's monthly performance data is accurate. On July 11, 2001, Liberty released an audit report that addresses all but a few PIDs and concludes that Qwest's performance data is "accurate and reliable."[8] This leaves the final question of whether Qwest's overall performance is adequate to satisfy each checklist item.

The Commission does not have to work in a vacuum to determine whether Qwest's performance is adequate. The Commission now has six Section 271 decisions where the FCC has deemed the BOC's performance adequate. Moreover, parties to the ROC

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[6] *Application of Verizon New York Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks, Inc., and Verizon Select Services, Inc. for Authorization to Provide In-Region, InterLATA Services in Connecticut*, FCC 01-208, App. D, ¶ 5 (July 20, 2001) *("Verizon Connecticut Order")*.

[7] *See Verizon Conn. Order*, App. D, ¶¶ 7-9. The FCC also considers the results of "independent third-party testing . . . in addressing the commercial readiness of a BOC's OSS." *Id*., App. D, ¶ 32.

[8] The Liberty Report covers all but seven of the PIDs. The PIDs that remain under review are as follows: Checklist Item No. 1: CP-1 Collocation Completion Intervals; CP-2 Collocations Completed Within Scheduled Intervals; CP-3 Collocation Feasibility Study Interval and CP-4 Collocation Feasibility Study Commitments Met; Checklist Item No. 2: PO-6 Work Completion Notification Timeliness; PO-7 Billing Completion Notification Timeliness; and PO-15 Number of Due Date Changes Per Order. The final Liberty Audit Report was just released on September 4, 2001.

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workshops determined the expected level of performance for virtually every performance measure. Under the ROC performance measures, adequate performance is determined in one of two ways: (1) parity with retail[9] or (2) where no retail analog exists, by meeting a performance objective or "benchmark." Qwest's actual performance data is presented in a form that allows the Commission to identify easily whether the standard is retail parity or a benchmark. If the measurement uses retail parity as its standard, the graph depicting the data shows two lines, one for wholesale performance and one for comparable retail performance. If the measurement uses a benchmark as its standard, the benchmark is depicted on the graph by a dotted line. These graphical depictions allow the Commission to look at each measure and see whether wholesale performance meets or exceeds retail performance or the expected benchmark.

Although this visual graphical comparison method always works for performance benchmarks, at times it does not work for retail parity. In other words, when the graphical depictions suggest inconsistent or disparate performance in favor of retail customers, a second check must be made. Specifically, when a retail analog exists, the FCC requires that Qwest serve CLECs in "substantially the same time and manner" as Qwest provides the analogous service to retail customers. In ROC workshops, all parties have agreed on statistical methods to determine if the performance is substantially similar.[10] Thus, if Qwest's retail performance is better than wholesale performance, the Commission must also look at the statistical result to determine whether the disparity is statistically significant. If the result is not statistically significant, the ROC standard has been met.

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[9] For purposes of this filing, Qwest defines "parity" consistently with the FCC's analytical framework for determining when a BOC's wholesale performance reflects non-discriminatory treatment as compared to its retail performance. Thus, Qwest uses "parity" to mean when (1) wholesale performance exceeds retail performance; (2) wholesale and retail performance are identical; or (3) retail performance is better than wholesale performance, but not to a statistically-significant degree. *Bell Atlantic New York Order*, ¶ 58 ("In this case, we conclude that to the extent there is no statistically significant difference between Bell Atlantic's provision of service to competitive LECs and its own retail customers, we need not look further.").

[10] Under the statistical standards the ROC adopted, if the Z score is higher than +1.645, retail performance is better than wholesale performance by a statistically significant margin. The same is true if the parity score is a positive number. The two statistical methods generally work together meaning that when the Z score is higher than 1.645, the parity score usually will be a positive number, indicating that retail performance exceeds wholesale performance by a statistically significant margin.

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Actual performance data from July 2000 through June 2001 in Washington is attached as Exhibit 2 on a checklist item basis. A detailed review of the data makes it clear that Qwest is already providing wholesale service at parity with retail service for most elements of the checklist. While the attached results demonstrate Qwest's performance prior to the conclusion of the Liberty audit, the results commencing as of March 2001 are relevant indicators of performance.[11] The adjustments made as a result of the Liberty audit tended to improve wholesale performance results by removing inappropriate data included in prior reports. Exhibit 3 explains each element that is measured, the purpose of the measurement, the measurement standard and formula, and report exclusions. Moreover, for those significant items on the checklist that have small or no volume in Washington, Qwest attaches its regional actual performance data from July 2000 through June 2001 as Exhibit 4. The regional data provides additional support that Qwest provides each aspect of the checklist at an acceptable level of quality.

B. Volumes Are Steadily Increasing

Qwest is making interconnection, UNEs and resale available to CLECs at a reasonable level of quality even though demand for these services has increased significantly over the past 12 months. From June 30, 2000 through June 30, 2001, competition in Qwest's region has surged:

- The number of interconnection agreements with CLECs increased from 944 to 1,153.
- CLECs have more than 872,000 interconnection trunks in service today, up 52% from one year ago.
- The number of collocations grew from 2,122 to 3,281, a 55% increase.
- Unbundled loops in service more than doubled, from 97,470 to more than 221,000. A year ago, 41 CLECs had unbundled loops in service; as of June 30, 2001 there are 63.
- The number of UNE-P facilities in service grew from 19 to 24,071.
- Line sharing was virtually nonexistent a year ago. As of June 30, there are 854 collocation augments in place specifically designed to support line sharing, from which CLECs had 6,320 line shared loops in service.
- Directory assistance trunks in service grew from 199 to 503.

[11] While Exhibits 2 and 4 contain 12 months of data (July 2000 through June 2001), this narrative will focus only on Qwest's performance since March 2001 given the FCC's focus on the BOC's most recent and current performance data. *See Verizon Conn. Order*, App. B & C.

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- White pages listings for CLEC customers doubled, from 470,074 to 944,290.
- Cumulative numbers ported increased from 1,009,073 to 1,904,119, an 89% increase.
- The number of active resellers increased from 100 to 121.
- More than 6.64 billion minutes of calls were exchanged between Qwest and CLEC customers in June 2001, up from 4.77 billion minutes in June 2000.

In the 12-month period from June 30, 2000 through June 30, 2001, competition in Washington has also increased:

- The number of interconnection agreements with CLECs increased from 117 to 138. Washington agreements represent 12% of the total number of agreements with CLECs in Qwest's region.
- CLECs have more than 158,379 interconnection trunks in service today, up 33% from one year ago. Washington CLECs utilize 18% of the total interconnection trunks in service in Qwest's region.
- The number of collocations grew from 355 to 481, a 35% increase. The number of collocations in Washington represents 15% of all collocations in Qwest's region.
- Unbundled loops in service more than doubled, from 14,007 to 38,880. A year ago, 13 CLECs had unbundled loops in service; as of June 30, 2001 there are 21. The number of unbundled loops in Washington represents 18% of all unbundled loops in service in Qwest's region. 33% of the CLECs utilizing unbundled loops in Qwest's region operate in Washington.
- The number of UNE-P facilities in service grew from 0 to 26,373.
- Line sharing was virtually nonexistent a year ago. As of June 30, there are 171 collocation augments in place specifically designed to support line sharing from which 4 CLECs had 2,106 line shared loops in service. 20% of the collocation augments and 33% of the regional line shared loops in service in Qwest's region are in Washington.
- Directly assistance trunks in service grew form 42 to 100 trunks. 20% of the directory assistance trunks in service in Qwest's region are in Washington.
- White pages listings for CLEC customers more than doubled, from 34,321 to 95,143. 10% of the white page listings for CLEC customers in Qwest's region are in Washington.
- Cumulative numbers ported more than doubled, from 94,541 to 239,812, a 154% increase. 13% of the cumulative numbers ported in Qwest's region are in Washington.
- The number of active resellers increased from 28 to 41. 34% of the active resellers in Qwest's region are in Washington.
- More than 1.22 billion minutes of calls were exchanged between Qwest and CLEC customers in June 2001, up from 965 million minutes in June 2000. 26% of the minutes of calls exchanged between Qwest and CLEC customers in Qwest's region are in Washington.

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C. Qwest's Actual Performance Meets 271 Objectives

In addition to the significant increases in raw numbers, Qwest's performance in provisioning and maintaining these products and services has been either acceptable or improving. Each month, Qwest records and reports tens of thousands of performance data points under the ROC PIDs for the prior 12-month period. The performance results, which are discussed in more detail below, show that Qwest is providing interconnection, collocation, access to UNEs, emerging services, number portability, and resale in a manner that is either "substantially the same as" the level of service in Qwest's retail operations, or that provides "efficient CLECs with a meaningful opportunity to compete."[12] This is true regardless of the CLEC's method of entry into the local exchange market: (1) facility based by-pass, (2) UNEs, or (3) resale. In particular:

- **Interconnection**: Between March and June 2001, Qwest met roughly 94% of its installation commitments to CLECs for interconnection trunks in Washington. The average installation interval was approximately 18 days, which was comparable to, or better than, the installation interval for Qwest's Feature Group D trunks (the agreed upon retail comparable). The trouble report rate was extremely small – 0.03% or less. Qwest cleared roughly 85% of those trouble reports within four hours. Blockage on CLEC trunks was consistently well below the benchmark of 1%.
- **Collocation**: In April-June, the only months in which Qwest reported data under new collocation PIDs that adopted the FCC's provisioning intervals, Qwest met almost all of its performance objectives in Washington. Qwest met the 90, 120, and 150-day benchmarks for each category of collocation. Qwest met 100% of its feasibility study commitments to CLECs in Washington.
- **UNE-P**: In March through June, Qwest provisioned more than 97% of its UNE-P, or unbundled network element platform, orders without a technician dispatch in Washington. For these orders, Qwest met 99% of its installation commitments to CLECs over the last four months with an average installation interval of about two days. Qwest completed 98.5% of UNE-P installations in Washington without a CLEC issuing a trouble report. Over the past 4 months, when trouble occurred, Qwest resolved roughly 86% of the "out of service" reports for UNE-P within 24 hours and cleared 95% of all trouble reports for UNE-P within 48 hours.
- **Loops**: In the past four months, Qwest steadily reduced the average installation interval for both analog loops (voice loops) and 2 wire non-

[12] These standards are the verbatim standards set by the FCC. Where retail parity exists, Qwest must provide service to CLECs in substantially the same time and manner. This is managed in the PIDs through use of statistical methodology. Where no retail analog exists, Qwest must provide an "efficient competitor a meaningful opportunity to compete." The ROC has set benchmarks in these situations that the ROC collectively determined would give CLECs a meaningful opportunity to compete.

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loaded loops (DSL loops), which account for approximately 89% of all CLEC loops in Washington. For analog loops, in June Qwest provisioned over 98% of its loops on time, besting the ROC 90% benchmark, with an average interval of approximately 5.89 days, below the ROC's six-day benchmark. More than 95% of these loop installations in the past four months were trouble free. For 2 wire non-loaded loops, Qwest met roughly 95% of all installation commitments to CLECs in June, with an average interval of 4.97 days. Nearly 96% of new installations were trouble free in Washington. Qwest completed 97% of its coordinated cutovers on time in June, exceeding the 95% benchmark and far exceeding the performance deemed acceptable by the FCC in New York. The June data are particularly significant because they reflect improvements due to Qwest's recent establishment of a center in Omaha to coordinate loop installations. The overall trouble rate for unbundled analog loops was below 1.5% for each of the last four months. In March through June 2001, Qwest cleared roughly 98% of CLEC "out of service" trouble reports for analog loops in Washington within 24 hours.

- **Resale**: Like UNE-P, an extremely high percentage of resale orders are provisioned without a technician dispatch. For March through June, Qwest met in excess of 99% of such commitments for residential customers, 97.41-98.87% for business customers, 98.84-100.00% for Centrex customers, and 100.00% for Centrex 21 customers. In the unlikely event that service was delayed for facility reasons, Qwest established service for wholesale customers at parity with Qwest retail performance. With respect to maintenance and repair for residential POTS, business POTS and Centrex, Qwest cleared out of service troubles within 24 hours at least 87% of the time.

Again, almost all of these performance results have been audited by Liberty. The Liberty Report concludes that Qwest's performance reports "accurately and reliably report actual Qwest performance" under the PIDs adopted by the ROC.[13] Liberty reached this conclusion after a thorough audit that (1) reviewed Qwest's processes for collecting and processing data; (2) analyzed and created "data sets" to ensure Qwest accurately captured all data; and (3) performed independent calculations to corroborate Qwest's results.[14] Consequently, the Commission may confidently rely on the performance results in assessing the quality of interconnection, resale and access to UNEs.

Qwest's wholesale volumes and its performance results demonstrate that competition is clearly present in the Washington local exchange market. The negotiated ROC PIDs are designed to quantify service performance to permit an evaluation of whether Qwest is

[13] Exhibit 1 at 2-3.
[14] Exhibit 1 at 1.

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meeting the requirements of Section 271. The PIDs address key aspects of service, primarily the timeliness and accuracy of installations and repairs. The high quality of Qwest's audited performance data, and the volume of activity reported, show that CLECs not only have a meaningful opportunity to compete, but also that they are taking full advantage of that opportunity. Qwest's ongoing reporting of performance data will guarantee that CLECs receive Qwest service in substantially the same time and manner as Qwest retail customers, in turn ensuring that the local exchange market remains open to competition.

II. A COLLABORATIVE, VERIFIABLE PROCESS IS IN PLACE TO EVALUATE QWEST'S PERFORMANCE

The PIDs under which Qwest is reporting data are the product of extensive meetings and discussions among Qwest, competitors, and regulators, all of whom worked together for over two years to reach agreement on appropriate performance measures.[15] The parties first achieved significant progress toward development of PIDs in the Arizona 271 workshops. Beginning in 2000, the ROC 13-state collaborative took the Arizona PIDs, amended them, and added additional PIDs. Most of the additional PIDs were then taken back to Arizona, where the PIDs are now virtually identical to the ROC. Thus, these PIDs have been developed in two ongoing processes that have engendered wide CLEC participation. The performance indicators are literally the result of an exhaustive process that has involved many thousands of hours. With the guidance and input of ROC members, all interested parties have had a hand in developing the current PIDs, which represent the most comprehensive body of measures developed to date. Therefore, Qwest's performance results under the PIDs are objective evidence that Qwest is providing wholesale services in a nondiscriminatory manner and in a manner that permits an efficient competitor a meaningful opportunity to compete.

[15] The PIDs take into account relevant FCC orders, including the FCC's preliminarily conclusions in its April 1998 Notice of Proposed Rulemaking relating to performance measurements. Performance Measurements and Reporting Requirements, FCC 98-72 (Apr. 17, 1998). The indicators also reflect the FCC's orders in response to Section 271 applications by other Regional Bell Operating Companies.

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The ROC has adopted performance indicators for each checklist item that is amenable to evaluation with quantified data. The PIDs address the following checklist items:

- Item 1 Interconnection (including collocation).
- Item 2 Access to network elements (including OSS and UNE Combinations).
- Item 4 Unbundled local loop transmission including subloop unbundling and line sharing.
- Item 5 Unbundled local transport including dark fiber.
- Item 7 911/E911, directory assistance, and operator services.
- Item 8 White pages directory listings.
- Item 9 Number administration.
- Item 10 Call related databases and associated signaling.
- Item 11 Interim number portability.
- Item 13 Reciprocal compensation.
- Item 14 Resale services.

The ROC has adopted roughly 50 PIDs for the checklist items. The PIDs are grouped into categories, such as Ordering and Provisioning ("OP") and Maintenance and Repair ("MR"). The PIDs disaggregate data to show performance in high density ("Zone 1" or "within MSA") and low density ("Zone 2" or "outside MSA") areas. The PIDs also disaggregate data with respect to installation and repair of different products and differentiate between services that require the dispatch of a technician and those that do not. As a result, the 50 PIDs yield nearly 800 different monthly measurements of performance for different products in distinct service areas. When multiplied by the number of occurrences reported, Qwest is recording millions of data points every month.

Each month, Qwest generates a report of performance results for each state in its region and for the entire 14-state region. Each report covers the prior 12 months' results for all of the PIDs (when available) and their subcategories. The most recent report available covers the period from July 2000 through June 2001.

Installation and repair activities are at the core of most service quality issues. As a result, the PIDs for installation and repair account for the bulk of the disaggregated data reported by Qwest. The monthly performance reports answer the following service-related questions: How long did it take Qwest to install the product or service? Was it installed on

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time? Was it installed correctly? Did CLECs issue any trouble reports? If so, how long did it take Qwest to repair the product or service? Was it repaired on time? Was it repaired correctly?

The monthly reports include every conceivable measure of service performance that may arise on a daily basis and will allow the Commission to readily determine that Qwest is providing wholesale services in a nondiscriminatory manner.

III. QWEST IS SATISFYING EACH OF THE SECTION 271 CHECKLIST REQUIREMENTS

A. Evidentiary Standards

In its rulings on prior 271 applications, the FCC has provided substantial guidance on the legal and evidentiary standards it will utilize to address performance issues. First, the FCC concluded that the applicant must make a *prima facie* showing that it meets the requirements of each checklist item. To satisfy that burden, Qwest

> must demonstrate that it has a concrete and specific legal obligation to furnish the item upon request pursuant to state-approved interconnection agreements that set forth prices and other terms for each checklist item, and that it is currently furnishing, or is ready to furnish, the checklist item in quantities that competitors may reasonably demand and at an acceptable level of quality.

Bell Atlantic New York Order ¶ 52. Opponents have the burden of rebutting a *prima facie* case with affirmative evidence showing that Qwest failed to provide the checklist items. *Id.* ¶ 49. Isolated incidents of noncompliance do not suffice. *Id.* ¶ 50. Moreover, the FCC has made clear that 271 dockets are not the place to resolve novel disputes about the precise scope of Qwest's obligations to its competitors. *SBC Kansas/Oklahoma Order* ¶ 10 (Jan. 22, 2001).

When, as here, parity and benchmark standards are developed through open proceedings with input from the incumbent and competing carriers, the standards represent informed and reliable attempts to objectively demonstrate how Qwest satisfies the Act.

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> Thus, to the extent there is no statistically significant difference between a BOC's provision of service to competing carriers and its own retail customers, the Commission generally need not look any further. Likewise, if a BOC's provision of service to competing carriers satisfies the performance benchmark, the analysis is usually done.

Verizon Connecticut Order at Appendix D-5, ¶ 8 (July 20, 2001). The FCC places tremendous emphasis on PIDs negotiated through an open process, such as occurred at the ROC. For example, the FCC concluded that when "[performance] standards are developed through open proceedings with input from both the incumbent and competing carriers, these standards can represent informed and reliable attempts to objectively approximate whether competing carriers are being served by the incumbent in substantially the same time or manner or in a way that provides them a meaningful opportunity to compete." *Verizon Massachusetts Order* ¶ 13.

Even when statistically significant differences in performance exist, the Commission may "conclude that such differences have little or no competitive significance in the marketplace." *Id.* The differences may be "slight, or occur in isolated months." *SBC Kansas/Oklahoma Order* ¶ 32. In such cases, "the Commission may conclude that the differences are not meaningful in terms of statutory compliance." *Verizon Connecticut Order* at Appendix D-5, ¶ 8. A steady improvement in performance over time indicates that problems are being resolved. *Bell Atlantic New York Order* ¶ 59. Moreover, when "there are multiple performance measures associated with a particular checklist item, the Commission considers the performance demonstrated by all the measurements as a whole. Accordingly, a disparity in performance for one measure, by itself, may not provide a basis for finding noncompliance with the checklist." *Verizon Connecticut Order,* App. D-5, ¶ 9.

Thus, the ultimate issue before this Commission is whether Qwest's overall performance on a checklist item by checklist item basis is adequate. The FCC has made clear that when performance metrics are negotiated, ILECs such as Qwest need not meet the negotiated standards 100% of the time to satisfy 271. This would be a virtual impossibility.

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The Commission's role is to assess all of the PIDs for a checklist item in totality and decide whether the performance is adequate. Thus, for example, resale has many hundreds of disaggregated performance measures. If Qwest meets 90% of those measures and misses 10%, the Commission could still find Qwest satisfies checklist item 14 (resale). Qwest, therefore, presents this data to demonstrate its overall performance to the Commission and will continue to do so until its 271 application is filed with the FCC. Qwest contends that its performance across the board is outstanding in many areas and is continually improving.

B. Checklist Item Performance

1. Checklist Item No. 1: Interconnection/Trunk Blocking/ Collocation

a. Interconnection

Interconnection trunks allow the mutual exchange of traffic between Qwest and CLECs. As of June 30, 2001, 32 CLECs had 158,379 interconnection trunks in service in Washington, a 33% increase over one year earlier. Of those, 102,897 connect CLEC end offices with Qwest end offices, and 55,482 connect CLEC end offices with Qwest tandem offices. Approximately 98% of all trunks (154,900) were two-way. In June 2001, Qwest exchanged more than 1.2 billion total minutes with CLECs in Washington over interconnection trunks. Each month the volume of traffic exchanged with CLECs grows. Washington minutes exchanged represent 26% of the total minutes exchanged in June 2001 in Qwest's region.

The ROC adopted detailed standards to evaluate Qwest's success in achieving interconnection with competitors. Qwest's performance under those standards shows that it is installing, maintaining, and repairing interconnection trunks within reasonably comparable time frames, in a manner such that call-blockage is minimized, and with the same level of quality as Qwest installs, maintains, and repairs its retail trunks.

***Trunk Blockage*.** The ROC concluded that call blockage less than or equal to 1% is always acceptable. The ROC also determined that, if blockage exceeds 1%, the blockage on

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CLEC trunks must be the same or less than on Qwest's own interoffice trunks. Some call blockage is caused by CLECs failing to order sufficient trunks. Whenever a CLEC's trunks are insufficient to carry the current call volume within the 1% blockage standard, Qwest issues a Trunk Group Service Request ("TGSR") advising the CLEC of the need to augment its trunks. If the CLEC fails to respond to the TGSR within 20 days, call blockage on those trunks is excluded from the total blockage figure.

Blockage is measured (1) on interconnection final trunk groups that connect CLEC end offices with Qwest tandems, and (2) on interconnection final trunk groups that directly connect CLEC end offices with Qwest end offices. To demonstrate that Qwest provides interconnection equal in quality to its own connections, Qwest also measures blocking on Qwest retail interoffice trunks, the comparable retail trunks identified by the ROC.

From March through June 2001, trunk blockage on CLEC interconnection to Qwest tandem offices was below the 1% benchmark in every month. In the last three months, blockage was 0.06% or less each month. *Exhibit 2* at 17, NI-1A. Trunk blockage on CLEC interconnection to Qwest end offices was equally insignificant. In March, blockage was 0.26% and in each of the following three months it was 0.10% or less. *Id.*, NI-1B.

***Trunk Installation Measures*.** The ROC also requires Qwest to measure aspects of the trunk provisioning process. Among other things, Qwest tracks the percentage of time it installs a trunk on or before the due date ("commitments met"), the average installation interval, and, when a trunk is delayed, the average length of the delay. For both of these indicators, Qwest uses data from its Feature Group D trunks for a retail comparison.

The data show that Qwest installed LIS trunks for CLECs in timeframes and at percentages at parity with Qwest's retail performance. In Zone 1 (high density areas), Qwest met more than 90% of its installation commitments with CLECs in March, April, May and June. Specifically, Qwest met 90.48% of its commitments in March, 94.29% in April, 100.00% in May and 100.000% in June. Qwest's wholesale performance was better than its retail performance in May and June of 2001. While wholesale performance was lower than

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retail in March and April, the difference was not statistically significant in any month. *Id.* at 1, OP-3.

Qwest achieved similar results for Zone 2 (low density areas). Qwest met 100.00% of its installation commitments to CLECs in April, May and June. In each of these months, Qwest's wholesale performance was better than its retail performance. While retail performance exceeded wholesale performance on this measure in March, the difference was not statistically significant. *Id.* at 2, OP-3.

In the aggregate, the average installation interval for CLECs in Zone 1 between March and June was 17.25 days and was at parity with the retail comparative in each of these months. *Id.* at 1, OP-4.

In Zone 2, the average installation interval for CLECs improved from 34.50 days in March to 10.08 days in June. Qwest's wholesale intervals were at parity with its retail averages in April, May and June. *Id.* at 2, OP-4. When an interconnection trunk order is delayed, Qwest tracks the average length of the delay in measure OP-6. This measure is then broken out into delays for facility reasons and delays for other than facility reasons.

For LIS installations, delays caused by non-facility reasons in Zone 1 improved from 12.25 days in March to 6.50 days in April. No wholesale LIS orders were delayed due to non-facility reasons in May or June since Qwest met 100% of its commitments. *Id.* at 1, OP-6A.

In Zone 2, there have been no wholesale delays for non-facility reasons since March since Qwest met 100% of its commitments. *Id.* at 2, OP-6A. Region-wide, wholesale delays caused by non-facility reasons ranged from a high of 29.09 days in March to a low of 7.33 days in April, with a weighted average of 20 days. In every month since March, regional wholesale results are at parity with retail results. *Exhibit 4* at 2, OP-6A.

In Zones 1 and 2, neither CLECs nor retail Feature Group D customers have experienced delays caused by facility reasons since March. *Exhibit 2* at 1-2, OP-6B.

With regard to installation, the percentage of new trunks installed without a CLEC

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filing a trouble report has improved from 86.90% in April to 92.98% in June. *Id.* at 3, OP-5.

Empirically, Qwest's wholesale results are at parity with its retail results. Overall, interconnection trunk installation for CLECs is virtually identical to, if not better than, the identical installation of retail Feature Group D trunks.

Trunk Maintenance and Repair Measures. Qwest has achieved similar success in maintaining and repairing interconnection trunks. The rate of trouble reports for interconnection trunks has been extremely small – 0.03% or less for all wholesale interconnection trunks in each month from March to June. The retail result has also been in this range over the same period of time. Overall, the trouble report rate has been comparable between wholesale interconnection trunks and retail Feature Group D trunks with less than 0.02% or two-tenths of a percent difference for any given month. *Id.* at 6, MR-8.

In Zone 1, Qwest cleared a higher percentage of CLEC trouble reports within four hours than retail trouble reports in three out of four months from March to June.[16] In the other month (May), retail performance was not better than wholesale performance to a statistically significant degree. *Id.* at 5, MR-5 (Zone 1).

In Zone 2, Qwest cleared a higher percentage of CLEC trouble reports within four hours than retail trouble reports in March and April. As with Zone 1, in no month since March has retail performance on this measure for Zone 2 been better than wholesale performance to a statistically significantly degree. *Id.* at 5, MR-5 (Zone 2). The data show that, in terms of the mean time to restore service across both Zone 1 and Zone 2, Qwest is maintaining and repairing interconnection trunking to competitors on a nondiscriminatory basis. *Id.* at 5-6, MR-6.

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[16] The retail service quality standard is 100% of out-of-service trouble reports must be cleared within two working days, less permitted exceptions.

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b. Collocation

Collocation allows CLECs to place equipment in Qwest central offices or other structures such as remote terminals. Qwest offers many varieties of collocation including physical collocation, virtual collocation, shared collocation, remote collocation, adjacent collocation and line sharing collocation. As of June 30, 2001, a total of 91 CLECs had completed 3,281 collocations in 498 regional Qwest central offices. These include 3,113 physical collocations and 168 virtual collocations. In 317 of the central offices with collocation, there are three or more collocators. CLECs also had completed 2,794 augments, including 2,683 physical augments and 111 virtual augments. As a result, competitors have easy access to most of Qwest's customers and CLECs can access 84.5% of Qwest's regional access lines through the existing collocations. In Washington, as of June 30, 2001, a total of 36 CLECs had completed 481 collocations in 68 Qwest central offices. These include 462 physical collocations and 19 virtual collocations. In 50 of the 68 central offices with collocation (73.5%), there are three or more collocators. CLECs also had completed 512 augments, including 493 physical augments and 19 virtual augments.[17] As a result, competitors have easy access to most of Qwest's Washington customers and CLECs can access 92.1% of Qwest's Washington access lines through the existing collocations.

The ROC's collocation PIDs changed significantly in March 2001. This was the direct result of two collocation decisions from the FCC in the latter part of 2000, concerning provisioning intervals. Qwest's original PIDs tracked collocation feasibility (10 days), quotes (25 days) and installations (90 days), all of which were added together to create the overall interval. The new PIDs only include feasibility (10) days and installations with an overall interval that subsumes all three components of collocation into one large interval. Qwest provides collocation intervals of 90 days when the collocation is forecasted at least 60 or more calendar days in advance of the application date and 120-150 days when no

[17] When a CLEC alters or adds to its collocation arrangement after the initial installation, it is considered a collocation augment.

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forecast is provided (depending on whether major infrastructure modifications are necessary).[18]

Thus, beginning in April, Qwest has measured its performance under eight PIDs. CP-1 tracks the average collocation interval and CP-2 measures collocation commitments met. More specifically, the CP-1 PIDs measure the extent to which collocation installations are provided within the intervals required by the FCC's rules or applicable interconnection agreements, CP-1A measures collocation installations for which the scheduled interval is 90 calendar days or less; CP-1B measures installations for which the scheduled interval is 91 to 120 days; and CP-1C measures installations with scheduled intervals between 121 to 150 days. The CP-2 PIDs measure the percent of collocation installations completed within the standard intervals; CP-2A measures forecasted collocation intervals where a CLEC provides a forecast to Qwest 60 or more calendar days in advance of the Collocation Application Date; CP-2B measures unforecasted installation intervals, and CP-2C measures both unforecasted collocation installations requiring major infrastructure modifications and those where the Ready for Service date is more than 120 calendar days after application. Finally, CP-3 and CP-4 focus on whether Qwest provides feasibility studies in a timely way. Specifically, CP-3 measures the average interval to complete a feasibility study. For this measure the ROC created a ten-day benchmark pursuant to FCC rule. CP-4 measures the percentage of feasibility studies Qwest completes within the allotted ten days. The ROC set a 90% benchmark for this measure.

In Washington, Qwest met its benchmarks in April, May and June 2001 for every collocation PID related to installation intervals. Qwest is well below the 90-, 120-, and 150-day benchmarks for the respective collocation installation intervals. *Id.* at 15, CP-1A, CP-1B, CP-1C; CP-2B, CP-2C. Under the CP-2 PIDs, Qwest completed 100% of installations

[18] There are other instances where a collocation could be greater than 90 days. For example, when a CLEC does not accept the collocation quote within 7 days per FCC rule. All of these exceptions are spelled out in detail in the SGAT. For ease of reference, Qwest will consistently describe intervals greater than 90 days as unforecasted and those greater than 120 days as unforecasted and requiring major modification.

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within the standard intervals for collocation applications received. *Id.* at 15, 16, CP-2B, CP-2C. Qwest also met 100% of its feasibility study commitments. *Id.* at 16, CP-4.

2. Checklist Item No. 2: Access to Unbundled Network Elements

In its prior orders concerning section 271 applications, the FCC has discussed access to OSS and UNE combinations under checklist item 2. The FCC has consistently demanded that, for 271 approval, BOCs must test their OSS. Qwest has such a test underway with Hewlett-Packard, the pseudo CLEC which is currently testing access to OSS. Qwest will report the results of that test upon completion. In the meantime, Qwest's OSS performance under the ROC PIDs is discussed below.

a. OSS

The Act requires that Qwest provide CLECs with nondiscriminatory access to its OSS in order to satisfy section 271. Qwest's OSS is a combination of the systems, databases, and personnel that are integral to its provision of service to end user customers. It consists of five capabilities: (1) pre-ordering; (2) ordering; (3) provisioning; (4) maintenance and repair; and (5) billing. To provide these capabilities, Qwest offers a variety of system interfaces, including Interconnect Mediated Access – Graphical User Interface ("IMA-GUI") (an internet type portal), Interconnect Mediated Access – Electronic Data Interchange ("IMA-EDI") (a computer-to-computer interface that allows Qwest's and CLECs' systems to interact), EXACT (an interface for CLECs to submit orders for interconnection trunks and certain unbundled network elements), EB-TA (a computer-to-computer repair interface) and Customer Electronic Maintenance and Repair ("CEMR") (an internet type maintenance and repair interface). A description of each of the five primary components of OSS follows.

- Pre-Ordering generally includes those activities that Qwest undertakes to gather and verify the information necessary to place an order. Providing CLECs with timely information on a pre-order basis allows the CLEC representative to interact efficiently with its potential customer. For instance, pre-ordering may involve: appointment scheduling;

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determining service and facility availability; address validation activities; access to customer service records; and obtaining loop qualification information. Pre-ordering is accomplished through Qwest's computer systems. Electronic "gateways" to these systems have therefore been developed so that CLECs can access this information.

• Ordering is the process by which a request is made for a particular service or capability (e.g., a loop or some other UNE). The OSS component of ordering is assessed by whether a Local Service Request ("LSR") is correctly generated (or rejected); and whether a Firm Order Confirmation ("FOC") is returned by Qwest's system. Therefore, through the ordering process, CLECs are apprised of information about the order (i.e., due dates through issuance of an FOC). CLECs can place orders through Qwest's electronic gateways or via facsimile.

• Provisioning is the process of following through on an order – i.e., making sure that it has been installed or "provisioned" as requested. Provisioning typically is assessed on the basis of timeliness and quality. For instance, when an order has been properly provisioned, a work completion notice will be generated; if an order cannot be provisioned in a timely manner, a jeopardy notice will be generated. Much of what Qwest is discussing in other portions of this document address Qwest's provisioning performance.

• Maintenance and Repair is necessary so that any problems with pre-ordering, ordering and provisioning can be corrected. As with provisioning, Qwest's maintenance and repair performance is discussed at length in other portions of this document.

• Billing is the process by which all of the services provisioned to customers are reconciled so that bills can be generated. Billing involves two things, the usage information Qwest sends to CLECs to enable them to bill their end users (called "daily usage feeds" or "DUFs") and the bills that Qwest sends to CLECs for the UNEs or resold products Qwest is providing. Qwest's OSS is periodically updated and improved. This necessitates systems changes. In order to effectively communicate these changes to CLECs, Qwest has developed as part of its OSS a CLEC Industry Change Management Process ("CICMP"),

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which identifies new processes and assists CLECs in implementing them. Qwest also provides training and assistance to CLECs to ensure that they are informed of all of the features and functionalities associated with Qwest's OSS. Qwest's CICMP and training and assistance programs are being evaluated comprehensively as part of the third party test. Recently, Qwest and the CLECs agreed to add two performance indicators addressing the change management functions at Qwest. PO-16 measures release notifications for changes to specified OSS interfaces sent by Qwest to CLECs within the intervals specified within the CICMP website, thereby evaluating Qwest's post release performance by measuring the timeliness of resolution of gateway or system outages attributable to software releases for specified OSS interfaces, focusing on CLEC-affecting software releases involving the specified gateways or systems.

Gateway Availability. The gateway availability ("GA") PIDs measure the percentage of time the systems for interfacing with Qwest's computer network are available to CLECs. The ROC benchmark for availability of all interfaces is 99.25% of the time. On balance, most CLECs prefer to use an IMA-GUI over the computer-to-computer EDI interface. Between March and June, Qwest exceeded the 99.25% benchmark for its IMA-GUI interface each month. *Exhibit 2* at 19, GA-1A, GA-1B, GA-1C. Qwest also met the benchmark in each month between March and June for its EDI interface and for EXACT. *Id.* at 19, GA-2; 20, GA-4. For EB-TA, Qwest met the benchmark in May and June. All of the interfaces were available 100% of the time in June. *Id.* at 19, GA-1A, GA-1B, GA-1C, GA-2; 20, GA-3, GA-4.

Pre-Order Response Times. The ROC PIDs require Qwest to measure the time it takes its computer network to respond to various CLEC requests for information. For the IMA-GUI and EDI interfaces, the PIDs assess the time it takes CLECs to schedule appointments, inquire about service availability times, conduct facility checks, validate addresses, get CSRs, make telephone number reservations, and qualify loops. The PIDs separately track the time it takes CLECs to submit requests, the time it takes Qwest to

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respond, and the time it takes to accept a CLEC order. The PIDs then aggregate those times and apply benchmarks ranging from 10-25 seconds.

Qwest's pre-order response performance has been outstanding. In April, May and June, Qwest met every aggregate benchmark for IMA-GUI and EDI pre-order response performance. *Id.* at 21-30, PO-1A-1 (Total), PO-1A-2 (Total), PO-1A-3 (Total), PO-1A-4 (Total), PO-1A-5 (Total), PO-1A-6 (Total), PO-1A-7 (Total), PO-1B-1 (Total), PO-1B-2, PO-1B-3, PO-1B-4, PO-1B-5, PO-1B-6 (Total), PO-1B-7.

Electronic Flow-Through. The flow-through PIDs measure the percentage of time that CLEC LSRs are converted into service orders recognized by Qwest's systems and submitted into Qwest's backend systems without manual intervention. The flow-through PIDs measure the overall flow-through rates (PO-2A) and the flow-through rates for orders that are designed to flow through (PO-2B).

Qwest's flow-through PIDs are diagnostic, because the FCC does not consider flow-through to be a "conclusive measure of nondiscriminatory access to ordering functions, but as one indicium among many of the performance" of Qwest's OSS. *Verizon Massachusetts Order*, at ¶ 77. The FCC recognizes that CLECs have a lot to do with the flow-through rates that a BOC can achieve – some efficient CLECs can achieve high flow-though rates while other, less efficient CLECs have lower flow-through rates. *Id.* at ¶¶ 78 & 80. For these reasons, the FCC focuses less on actual flow-through rates than on whether the BOC's OSS are capable of flowing orders through. *Id.* at ¶¶ 77 and 80.

Qwest's flow-through rates are dramatically improving, and the PID results demonstrate that Qwest's OSS are capable of flowing orders through. For electronic flow-through for all eligible LSRs received via IMA-GUI, Qwest's flow-through rates increased from 69.33% in April to 80.07% in June for POTS Resale, from 9.73% in March to 42.70% in June for Unbundled Loop Aggregate, from 72.32% in April to 90.06% in June for LNP, and from 35.50% in March to 76.92% in June for UNE-P POTS. *Id.* at 33, 35, 37, 38, PO-2B-1. For electronic flow-through for all eligible LSRs received via IMA EDI, there is very

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little data in Washington for EDI POTS Resale and EDI UNE-P POTS. *Exhibit 2* at 33, 39, PO-2B-2. Region-wide for those measures, Qwest's flow-through rates increased from 79.95% in March to 97.31% in June for EDI POTS Resale and from 30.77% in May to 61.65% in June for EDI UNE-P POTS. *Exhibit 4* at 33, 39, PO-2B-2. In Washington, Qwest's flow-through rates increased from 69.33% in April to 80.07% in June for IMA POTS Resale and from 35.50% in March to 76.92% in June for IMA UNE-P POTS. *Exhibit 2* at 33, 38, PO-2B-1. In addition, flow through rates increased from 8.11% in March to 74.10% in June for EDI Unbundled Loop Aggregate and from 73.25% in March to 92.59% in June for EDI LNP. *Id.* at 35, 37, PO-2B-2.

LSR Rejections. There are times when CLECs do not adequately complete LSRs, thereby requiring LSR rejection. For the IMA-GUI and EDI interfaces, the ROC PIDs require Qwest to track the length of time it takes Qwest to submit LSR rejection notices to CLECs. The PIDs set benchmarks in hours for manual rejections and benchmarks in seconds for electronic rejections.

For both the IMA-GUI and EDI interfaces, Qwest met the 12-hour (manual) and 18-second (electronic) benchmarks in each month from March to June. *Id.* at 40, PO-3A-1, 3A-2, 3B-1; 41, PO-3B-2. Qwest also met the 24-hour LSR rejection benchmark for manual and IIS in May and June. *Id.* at 41, PO-3C.

Firm Order Confirmations. The PIDs also measure the percentage of FOCs Qwest sends to CLECs on time for various products and services. FOCs identify the due date CLECs should expect to receive the requested service. For resale, Qwest submitted over 99% of FOCs on time for LSRs processed electronically through IMA-GUI and EDI in each month between April and June. *Id.* at 43, PO-5A-1(a), PO-5A-2(a). For IMA-GUI LSRs processed in part manually, Qwest met the 90% benchmark in each month between March and June. *Id*. at 44, PO-5B-1(a). For EDI LSRs processed in part manually, Qwest's performance improved markedly in June, when it reached 100%. *Id.*, PO-5B-2(a). Qwest met the 90% benchmark for orders processed manually in March and April and fell only

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slightly short (89.35%) in May. June results missed the benchmark but FOC volumes were approximately 90% lower than the prior month. *Id.*, PO-5C-(a).

Qwest's performance with respect to LSRs for unbundled loops has also been superior. Qwest met the 95% on time FOC benchmark in May and June for LSRs processed electronically through IMA-GUI and EDI. *Id.* at 45, PO-5A-1(b), PO-5A-2(b). For orders processed in part manually, Qwest met the 90% benchmark for IMA-GUI and EDI LSRs in each month between March and June. *Id.* at 45-46, PO-5B-1(b), PO-5B-2(b). For manually processed LSRs, Qwest met the 90% benchmark in every month between March and June. *Id.* at 46, PO-5C-(b).

Qwest met the ROC 95% benchmark for local number portability FOCs in every month between March and June for LSRs processed electronically. *Id.* at 47, PO-5A-1(c), PO-5A-2(c). With one exception, Qwest met the 90% benchmark for FOCs on time for LSRs processed in part manually. *Id.* at 48, PO-5B-1(c), PO-5B-2(c).[19] Since March, Qwest has consistently improved its performance for manually processed LSRs and exceeded the 90% benchmark in May and June. *Id.*, PO-5C-(c). Finally, Qwest has met the 85% benchmark for LIS trunks in every month from March through June and has submitted more than 98% of FOCs on time in three of those months. *Id.* at 49, PO-5D.

Jeopardy Notifications. When it becomes evident that Qwest will not meet the expected due date, Qwest submits a jeopardy notification. The ROC PIDs also compare Qwest's wholesale and retail performance in submitting jeopardy notifications. The PIDs assess the average interval and the percentage of timely jeopardy notices for four categories: non-designed services; unbundled loops; LIS trunks; and UNE-P POTS.

For non-designed services, Qwest submitted jeopardy notices to CLECs, on average, 0.71 to 4.00 days before the scheduled delivery date in April through June. While that on average fell slightly short of retail performance (but never to any statistically significant degree), Qwest's wholesale performance virtually matched retail performance on this

[19] April results were 88.3%. *Id.* at 47, PO-5B-1(c).

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measure in June. *Id.* at 51, PO-8A. The percentage of timely notices to CLECs increased from 3.57% in May to 11.11% in June, again virtually matching retail performance. *Id.* at 51, PO-9A.

Qwest's wholesale performance with regard to the submission of jeopardy notices for unbundled loops and number portability exceeded its retail performance in every month between March and June. The notice interval improved, for example, from 4.01 days in March to 6.16 days in June. *Id.* at 52, PO-8B. The percentage of timely notices for wholesale in those months also exceeded the percentage for retail. *Id.*, PO-9B.

Qwest submitted very few jeopardy notifications to CLECs for LIS trunks. Although the results were erratic, Qwest's average jeopardy notice interval to CLECs, and the percentage of on time jeopardy notices to CLECs, were at statistical parity with retail performance in the each month between March and June. *Id.* at 53, PO-8C, PO-9C.

There were no CLEC jeopardy notices for UNE-P POTS in Washington and few region-wide. *Id.* at 54; *Exhibit 4* at 54, PO-8D, PO-9D.

Access to Centers. Qwest also measures the access that both CLECs and Qwest retail customers have to Qwest centers. PID OP-2 measures the percentage of calls to Qwest's interconnection provisioning center that were answered within 20 seconds. Qwest's wholesale performance was excellent, with 92-96% of all CLEC calls answered within 20 seconds in the months of March through June. This performance was better than the retail comparative in each month.[20] *Exhibit 2* at 57, OP-2.

PID MR-2 similarly measures the percentage of calls to Qwest's interconnection repair center that were answered within 20 seconds. Qwest's wholesale and retail performance in this category were at parity in each month between March and June, with 89.22% of CLEC calls and 88.26% of retail calls answered within 20 seconds in the

[20] Qwest is aware of its need to improve retail performance and expects to meet its retail standard of 80% of calls answered within thirty seconds by October. The Company has been unable to meet this standard due to a number of factors, primarily the need for skilled and trained personnel. A significant number of employees have been hired and are in training at this time.

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aggregate. *Id.*, MR-2.

Billing. Qwest has several billing measures that track billing timeliness, accuracy of usage records sent to CLECs, and the accuracy of bills rendered for UNEs and resold services.

PID BI-1A tracks the average number of days it takes Qwest to provide DUFs for unbundled network elements and resale. In each month between March and June, Qwest provided usage records to CLECs in an average of 2.44-2.61 days, significantly less than the retail average during those same months. *Id.* at 58, BI-1A.

Between April and June, Qwest delivered 100% of bills to CLECs within the 10-day period prescribed by PID BI-2. *Id.* at 59, BI-2.

In terms of billing accuracy, Qwest improved from its May result of 78.67% accuracy for bills to CLECs for resale and unbundled network elements not requiring an adjustment due to an error to 97.52% in June. *Id.* at 60, BI-3A. The completeness of Qwest's bills to CLECs steadily improved from 87.19% in March to 95.63% in June. *Id.* at 62, BI-4A.[21]

b. Unbundled Network Element Combinations

Checklist Item 2 also includes all forms of UNE Combinations. As a general rule, UNE Combinations are comprised of the UNE-Platform (or "UNE-P") and Enhanced Extended loop (or "EEL"). UNE-P allows CLECs to provide basic exchange service at UNE rates, and EEL (combinations of loop and dedicated transport) allows CLECs to extend their service territory without requiring an additional collocation. Qwest offers and tracks performance around both forms of UNE-Combination.

In the past year, region-wide Qwest has experienced astonishing growth in CLEC demand for UNE-P facilities. As of June 30, 2001, a total of 17 CLECs in Qwest's region had 452,212 UNE-P circuits: 24,071 traditional UNE-P circuits and 428,141 "UNE-Star"

[21] The metrics for accuracy and completeness of reciprocal compensation, PIDs BI-3B and BI-4B, are discussed under checklist item 13.

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circuits, a hybrid service that is, effectively, nothing more than UNE-P. One year earlier, CLECs had only 19 UNE-P circuits in service. In Washington, eight CLECs have 26,373 UNE-P circuits; a year ago there were no UNE-P circuits. Qwest has successfully met the demand by promptly installing and repairing UNE-P for CLECs.

Installation of UNE-P. Qwest installs the vast majority of all UNE-P lines without a technician dispatch. The key, therefore, to whether Qwest is meeting its statutory obligations for UNE-Combinations is how it provisions and maintains UNE-P without a dispatch. For UNE-P orders in that category, Qwest met 97.37% of its installation commitments to CLECs in March, 99.69% in April, 95.51% in May, and 100.00% in June. *Id.* at 66, OP-3. Over that period, the average installation interval was slightly more than two days. *Id.*, OP-4. Installation quality was excellent. Three out of four months, Qwest completed over 97% of wholesale installations without a CLEC filing a trouble report between March and June. *Id.* at 67, OP-5.

In the aggregate, less than 1% of UNE-P installations from March through June required dispatch. *Id.* at 64-66, OP-3. For dispatches within MSAs, Qwest met 91.43% of its CLEC installation commitments between March and June and achieved parity with its retail performance. *Id.* at 64, OP-3. While there is very little Washington activity for dispatches outside MSAs, region-wide Qwest achieved parity with retail performance in May and June. *Exhibit 4* at 65, OP-3. Qwest's wholesale and retail performance in Washington was at parity from March through June with respect to installation intervals and delayed days for facility reasons for both categories of dispatches. *Exhibit 2* at 64-65, OP-4, OP-6A.

Repair of UNE-P. Between March and June, the overall trouble rate in Washington for CLEC UNE-P was consistently less than 1.5% each month, lower than the trouble rate for comparable retail installations in each such month. *Id.* at 71, MR-8. With regard to Qwest's efficiency in resolving troubles when they do arise, Qwest cleared 94.8% of all CLEC trouble reports in Washington within 48 hours and met 93.98% of its CLEC repair

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appointments between March and June. *Id.* at 68-70, MR-4; 71, MR-9. Qwest achieved parity under the "repair repeat report" PID in three of the past four months, and region-wide recorded an all time low CLEC repeat trouble of 15.74% in June. *Id.*, MR-7; *Exhibit 4* at 71, MR-7.

For dispatches within MSAs, Qwest cleared 70.00% of CLEC out of service reports within 24 hours in March, 88.89% in April, 94.12% in May, and 83.33% in June. Qwest's wholesale performance was at parity with retail in April, May and June. *Exhibit 2* at 68, MR-3. The mean time to restore service to CLECs steadily improved from over 26 hours in March to less than 16.5 hours in June. *Id.*, MR-6. The wholesale repeat trouble rates were at parity with the retail equivalent measure in March through June. *Id.*, MR-7. The results for dispatches outside MSAs were similar. In three of the four months between March and June, Qwest cleared at least 80% of CLEC out of service reports within one day, and at least 93% of all CLEC trouble reports within two days. *Id.* at 69, MR-3, MR-4. These results show that Qwest is satisfying the statutory mandate to provision and repair unbundled network elements, specifically UNE-P, on a nondiscriminatory basis.

***Enhanced Extended Loops*.** As stated above, EELs are a specific form of UNE combination specifically comprised of an unbundled loop and unbundled dedicated interoffice transport ("UDIT"). CLECs have only begun ordering EELs from Qwest in the last few months. Given the relatively small volumes of orders, the ROC has not yet set performance objectives for the provision or maintenance/repair of EELs. Although performance data is relatively scarce, the data that does exist shows that Qwest is providing EELs at an acceptable level of quality. Qwest met its only installation commitment to a CLEC in June. *Id.* at 72, OP-3. Region-wide, Qwest met 84.62% of its installation commitments to CLECs in April and 88.24% in June. *Exhibit 4* at 72, OP-3.

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3. Checklist Item No. 3: Access to Poles, Ducts, Conduits, and Rights of Way

As of June 30, 2001, CLECs had attached to 301 Qwest-owned poles and occupied 20,628 feet of duct space in Washington. Qwest offers competitors access to its poles, ducts, conduits, and rights-of-way under: (1) Section 10.8 of its SGAT; (2) negotiated interconnection agreements; and (3) stand-alone agreements, such as the "Qwest Pole Attachment and/or Innerduct Occupancy General Terms and Conditions," which Qwest and its predecessor has used since before 1996. Qwest denies access only when there is insufficient capacity or a bona fide safety, reliability, or generally applicable engineering constraint. The ROC has not adopted any performance measures for this checklist item.

4. Checklist Item No. 4: Unbundled Loops

In every 271 decision issued to date, the FCC has spent a substantial amount of time discussing unbundled loops and the performance data around unbundled loops. In the past, many thought of loops as analog voice grade loops. Over the past few years, 2-wire non-loaded loops – those loops used to support DSL service – have become more and more prevalent. The UNE Remand Order also required Qwest to unbundle high capacity loops. Thus, Qwest offers a variety of unbundled loops to CLECs including 2-wire analog loops, 2-wire non-loaded loops, 4-wire non-loaded loops, ISDN capable loops, ADSL compatible loops, DS-1 loops, DS-3 loops, dark fiber loops, and OC-n, lit fiber loops. Qwest also offers subloops, line sharing, line splitting, and loop splitting. Qwest tracks performance data on a disaggregated basis around almost every form of unbundled loop.

As of June 30, 2001, Qwest had supplied 63 CLECs in its region with 221,205 unbundled loops, including 178,645 two-wire analog loops, 27,775 two-wire non-loaded loops, 9,855 ISDN BRI loops, 1,285 two-wire ADSL compatible loops, 576 four-wire non-loaded loops, and 3,051 DS1 capable loops. CLECs are yet to order DS-3 capable loops or OC-n capable loops. The number of unbundled loops in service increased by 127% in the preceding 12 months. As of June 30, 2001, Qwest had supplied 21 CLECs with 38,880

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unbundled loops (17.6% of the total unbundled loops in Qwest's region) in Washington. The 38,880 unbundled loops included 28,331 2-wire analog loops, 6,114 2-wire non-loaded loops, 2,187 ISDN BRI loops, 375 2-wire ADSL compatible loops, 340 4-wire non-loaded loops and 1,521 DS1 capable loops

Qwest's performance results demonstrate that it is provisioning unbundled loops on a non-discriminatory basis for CLECs in Washington and throughout the region. Qwest is fulfilling orders promptly, with minimal service problems, and has a strong maintenance and repair record.

a. Analog Voice Loops

Installation of Unbundled Analog Loops. Analog loops account for 80% of all unbundled loops in service in Qwest's region and 73% in Washington. Qwest's installation performance for unbundled analog loops has far exceeded the ROC's 90% benchmark. In Zone 1, Qwest met 98.30% of its installation commitments to CLECs in March, 96.81% in April, 98.24% in May and 98.44% in June. *Exhibit 2* at 75, OP-3 (Zone 1). The results were equally impressive in Zone 2, where Qwest met 98.40% of its installation commitments in March, 95.90% in April, 99.53% in May and 99.50% in June. *Id.* at 76, OP-3 (Zone 2).

Qwest has also performed well with regard to the average installation interval for CLEC loops. In June, Qwest averaged 5.89 days to install CLEC loops in Zone 1 and Qwest met the six-day benchmark in Zone 1 in March, May and June. *Id.* at 75, OP-4 (Zone 1).[22] While the Washington-specific data is very limited as to this measure for Zone 2, region-wide Qwest has steadily shortened the average installation interval for CLEC loops. For June, that average interval was 5.74 days, again below the six-day benchmark. *Exhibit 4* at

[22] On the rare occasions when Qwest is late in installing the loops, Qwest is working to shorten the length of the delays. The amount of delayed days for facility reasons in Zone 1 is already at parity with Qwest's retail performance. Between March and June, the average delay for facility reasons for CLECs was 10.58 days, compared to 15.18 days for the analogous retail product. *Exhibit 2* at 76, OP-6B (Zone 1). In those same months, Qwest reduced the average number of delayed days for non-facility reasons in Zone 1 to an amount that is approaching parity with Qwest's retail analogue -- wholesale averaged 4.81 days, while retail averaged 4.67 days. *Id.* at 76, OP-6A (Zone 1). Similarly, between April and June, the total interval for pending orders delayed past the due date has moved significantly towards parity with the retail equivalent. *Id.* at 77, OP-15A.

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77, OP-4 (Zone 2).

Qwest is working to improve its product offerings and reduce the delivery time to CLECs. Qwest recently rolled out a new product called "Quick Loop" in its service region. Quick Loop provides a three-day due date for 2/4 wire analog loops of 1-24 lines for CLECs submitting a complete and accurate Local Service Request through IMA-GUI or IMA-EDI. Quick Loop includes a lift and lay only, without other functions, such as performance testing. The introduction of the Quick Loop product allows CLECs to choose from the short three-day day due date or the normal due date, depending on the nature of the service sought. Qwest anticipates that the new product will shorten installation interval for analog loops even further.

Qwest installed more than 95% of new CLEC loops each month from March through June without a CLEC filing a trouble report. Those results exceeded retail performance in each of these months. *Exhibit 2* at 77, OP-5.

Repair of Unbundled Analog Loops. The FCC has given guidance on when analog loop performance is sufficient to meet 271 standards. In its New York decision, the FCC concluded that a BOC satisfies the requirements of checklist item 4 if it meets 90% of its installation commitments, less than 5% of loop installations result in a service outage, and less than 2% of loops experience trouble. *Bell Atlantic New York Order* at 162-63, ¶ 309. Qwest is meeting that standard for analog loops.

At the outset, it is important to note that repairs are rarely needed. The monthly trouble rate for analog loops provisioned to CLECs ranged from 1.10% to 1.47% during the months of March through June. In each of these months, the wholesale trouble rate for analog loops was lower than the also low retail trouble rate (1.51-1.82%). *Exhibit 2* at 81, MR-8.

As to repairs when occasionally needed, in each month between March and June, Qwest cleared well over 96% of all out of service reports for CLECs within 24 hours in Zone 1 and between 92.31-98.73% in Zone 2. *Id.* at 79-80, MR-3. In those months Qwest

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cleared in the aggregate 99.28% of all CLEC trouble reports within 48 hours in Zone 1 and 100.00% in Zone 2. *Id.*, MR-4. With one exception, Qwest's wholesale performance surpassed Qwest's retail service as to this measure in each month between March and June. *Id*. Similarly, the mean time to restore service to CLECs was quicker than for retail service in each month from March to June. *Id*., MR-6. Finally, demonstrating Qwest's repairs for CLECs have been of high quality, in May and June, the repeat trouble rate for CLEC loops was lower than for Qwest's retail service. *Id*., MR-7.

b. Coordinated cutovers

Another key component of loop provisioning is how well Qwest performs coordinated cuts (also known as "hot cuts"). Measure OP-13A assesses the percentage of coordinated cuts of unbundled loops completed on time. To be counted as "on time," the CLEC must agree to the start time, and Qwest must (1) receive verbal CLEC approval before starting the cut or lifting the loop, (2) complete the physical work and appropriate tests, (3) complete the Qwest portion of any associated LNP orders and (4) call the CLEC with completion information, all within one hour of the "committed order due time." The "committed order due time" is calculated by adding a specified interval to the scheduled start time. The specific interval depends on the type and number of loops involved and ranges from one to two hours for analog loops. The benchmark for this measure is 95% completion on time.

Qwest opened a new center in Omaha in late March 2001 to manage all coordinated cutovers (the largest percentage of loops ordered). The Omaha Center also made a number of process improvements. Qwest's on time performance of hot cuts has steadily improved over the last four months. Qwest's on time performance in Zone 1 for analog loops improved from 74.55% in March to 98.17% in June, better than the 95% ROC benchmark. *Id.* at 120, OP-13A (Coordinated Cuts Completed on Time (Percent) Unbundled Loop – Analog (OP-13A) – Interval Zone One). For all other loops, Qwest's on time performance in Zone 1 improved even more, from 52.43% in March to 93.02% in June. *Id.*, OP-13A

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(Coordinated Cuts Completed on Time (Percent) Unbundled Loop Other (OP-13A) – Interval Zone One). Qwest's current level of performance around such hot cuts exceeds that accepted by the FCC when approving the Verizon New York 271 application. *Bell Atlantic New York Order* ¶ 298.

The second coordinated cut performance metric measures the number of minutes a CLEC customer is out of service during the requisite "lift and lay" procedure that moves the customer over to the CLEC switch. PID OP-7, "coordinated hot cut interval – unbundled loop," tracks the time necessary to complete coordinated cuts. This measure focuses on the time actually involved in disconnecting the loop from the Qwest network and connecting/testing the loop.

Qwest's performance under this metric has steadily improved. For analog loops, the coordinated cut interval shrunk from 8 minutes in March to 4 minutes in June. *Exhibit 2*, OP-7 (Coordinated Hot Cut Interval (Hours:Minutes) Unbundled Loop – Analog (OP-7) – Interval Zone One). For other loops, the interval fell from 22 minutes in April to 11 minutes in June. *Id.*, OP-7 (Coordinated Hot Cut Interval (Hours:Minutes) Unbundled Loop Other (OP-7) – Interval Zone One). The FCC has suggested this level of performance is adequate.[23] Qwest also has improved its coordination with CLECs. In June, Qwest commenced less than 0.19% of coordinated cuts for analog loops in Zone 1 without CLEC approval and 0.63% of coordinated cuts for other loops in Zone 1 without CLEC approval. *Exhibit 2* at 121, OP-13B.

c. Non-Loaded (2-Wire) Loops

Installation of non-loaded (2-wire) loops. These loops, which account for 15.7% of all unbundled loops in service in Washington, support DSL service. These loops may not have load coils on them and, thus, may need to be conditioned to meet the CLEC needs. In Zone 1, Qwest improved its percentage of CLEC installation commitments met from

[23] *Application by BellSouth Corporation, et al., Pursuant to Section 271 of the Communications Act of 1934, as Amended, to Provide In-Region, InterLATA Services in Louisiana*, CC Docket No. 98-121, Memorandum Opinion and Order, 13 FCC Rcd 20599, ¶ 197.

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87.41% in March to 95.75% in June and achieved the 90% benchmark for CLEC installation commitments in May and June. *Id*. at 82, OP-3. In Zone 2, Qwest improved on this measure from 73.81% in March to 92.00% in June. *Id.* at 83, OP-3. In both Zones 1 and 2, Qwest's wholesale performance on this measure was at parity with its retail performance in each month from March to June. *Id.* at 82-83, OP-3. Qwest is provisioning these loops in intervals that are shorter than the six-day interval benchmark. Qwest met or bettered the benchmark in May and June in both Zones 1 and 2. *Id.* at 82-83, OP-4.

The interval for pending wholesale orders delayed past the due date was at parity with the retail analogue between March and June. *Id.* at 84, OP 15A

As to the quality of the loops installed by Qwest in Washington, in each month between March and June, over 96% of CLEC loops were installed without trouble reports. *Id*., OP-5.

***Repair of non-loaded (2-wire) loops*.** The need for repairs of non-loaded (2-wire loops) has been infrequent. In each month between March and June, the trouble rate for CLEC loops was well under 1%. *Id*. at 88, MR-8. In terms of the promptness of Qwest repairs, when occasionally needed, in Zone 1, Qwest cleared 96.83% of CLEC out of service reports within 24 hours in March, 94.59% in April, 100.00% in May, and 96.97% in June. *Id.* at 86, MR-3. While there were few repairs needed in Zone 2, Qwest's performance in Zone 2 was comparable, with Qwest in the aggregate clearing more than 91% of CLEC out of service reports (31 out of 34) within 24 hours between March and June. *Id.* at 87, MR-3. Similarly, Qwest in the aggregate cleared 99.05% of all CLEC trouble reports within 48 hours between March and June. *Id*. at 86-87, MR-4. These results exceeded Qwest's retail ISDN-BRI repair performance (the comparable retail service), which in the aggregate achieved 92.31% of trouble calls cleared within 48 hours. *Id.*

In terms of the mean time to restore service for non-loaded (2-wire) loops, Qwest's wholesale performance was at parity with its retail performance between March and June. *Id.*, MR-6. As to the quality that Qwest is providing repairs; the CLEC repeat trouble rate

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was in the aggregate only 18.4%, with only 39 total occurrences in Washington between March and June. *Id.* at 86-87, MR-7.

d. Non-Loaded (4-Wire) Loops

Installation of Non-Loaded (4-Wire) Unbundled Loops. CLECs have requested only a small number of 4-wire loops. In fact, none was requested in Zone 2 between March and June. *Id.* at 90, OP-3. In Zone 1, Qwest's performance improved from meeting 42.86% of its installation commitments to CLECs in March to meeting 100.00% of such installation commitments in June. *Id.* at 89, OP-3. The average installation interval for CLECs in Zone 1 declined from 21.75 days in March to 5.00 days in June. *Id.*, OP-4. While there were very few CLEC delays for facility or non-facility reasons in Zone 1 between March and June, the length of these delays was at parity in each month with retail performance. *Id.*, OP-6A OP-6B. In terms of Qwest's installation quality, CLECs did not file a single trouble report for new installations of non-loaded (4-wire) loops between March and June. *Id.* at 91, OP-5.

Repair of Non-Loaded (4-Wire) Unbundled Loops. At the outset, it is important to note that few repairs are needed, with only 10 trouble reports filed for non-loaded (4-wire) unbundled loops between March and June. *Id.* at 94, MR-8. The trouble rate in Washington for 4-wire loops provisioned to CLECs was less than 1% in three of those four months, and has consistently remained below that experienced by retail customers. *Id*. In terms of the speed of Qwest repairs, in Zone 1, Qwest cleared 100% of all CLEC trouble reports within four hours between March and June, better than retail performance. *Id*. at 93, MR-5. Similarly, the mean time to restore CLEC service was well under two hours in each of these months, in each month quicker than the comparable retail service. *Id*., MR-6. As to the quality of Qwest's repairs for CLECs, between March and June, no repeat troubles were required for CLEC loops. *Id*., MR-7.

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e. DS-1 Capable Loops

Installation of DS-1 Capable Loops. Qwest steadily improved its performance between March and June in meeting CLEC installation commitments for DS-1 capable loops and was at parity with retail performance throughout the state in April, May, and June. *Id*. at 95-96, OP-3. In Zone 1, Qwest's ability to meet installation commitments to CLECs improved from 59.09% in March to 78.38% in June. In Zone 2, Qwest met all but one installation commitment between March and June. *Id.* In Zone 1, the average interval for Qwest provisioned DS-1 capable loops for CLECs improved from 18.56 days in March to 8.61 days in June. Qwest's wholesale performance on this measure was better than its retail performance in April, May and June. *Id.*, OP-4. In Zone 1, in May and June CLEC delays for facility and non-facility reasons were at parity with retail customer delays. *Id.*[24] OP-6A, OP-6B. Similarly, the CLEC interval for completion of pending orders past the due date was at parity with the interval for retail customers in March, May and June. *Exhibit 2* at 97, OP-15A.

In terms of the quality of Qwest's installation of DS-1 capable loops, in each month between March and June Qwest installed more than 93% of new loops without a CLEC filing a trouble report. In April, May and June, Qwest's wholesale performance was at parity with its retail performance. *Id.* at 97, OP-5.

***Repair of DS-1 Capable Loops*.** The CLEC trouble rate for DS-1 loops fell from 4.38% in March to 2.54% in June. Though the trouble rate for CLECs exceeded that for Qwest's retail customers, the margin in June was no longer statistically significant. *Id*. at 100, MR-8.

Restoration of CLEC DS-1 loop service within four hours in Zone 1 improved from 61.40% in March to 65.85% in June, in which it reached parity with the percentage restored for retail customers. *Id.* at 99, MR-5. Similarly, Qwest has improved the mean time to

[24] There was very little or no data on PIDs OP-4, OP-6A and OP-6B for Zone 2 in Washington. *Id*. at 96, OP-4, OP-6A, OP-6B. Region-wide, however, wholesale performance was superior to retail on each of the measures in each month from March to June. *Exhibit 4* at 97, OP-4, OP-6A, OP-6B.

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restore interval in Washington. In Zone 1, Qwest improved on this measure from 8 hours, 41 minutes in May to 3 hours, 59 minutes in June, in which month it reached parity with retail performance. *Id.* at 99, MR-6. The data reveals no troubles in Zone 2 for DS-1 capable loops. Region-wide, Qwest cleared 100% of CLEC trouble reports in Zone 2 within four hours in April, and in each month between March and June wholesale performance was equal to, or better than, retail results. *Exhibit 4* at 100, MR-5.

f. ISDN Capable Loops

Installation of ISDN Capable Loops. These loops, which account for 5.6% of all unbundled loops in service in Washington, are used by most CLECs to provision IDSL to customers. Over the last four months, Qwest has significantly improved its performance at meeting CLEC ISDN capable installation commitments. Qwest's percentage of CLEC installation commitments met jumped from 67.39% in March to 87.96% in June in Zone 1 and from 47.37% in March to 70.59% in June in Zone 2. *Exhibit 2* at 101-102, OP-3. While those results were slightly below retail performance during the same period, Qwest's wholesale performance was at parity with retail performance in June in both Zones 1 and 2 *Id.* The average installation interval for CLEC loops fell from 12.00 days in March to 5.28 days in June in Zone 1 and from 12.11 days in March to 8.53 days in June in Zone 2. *Id.* at 101-102, OP-4. In the aggregate, the average installation interval for ISDN capable loops between March and June was 8.63 days for CLECs and 9.51 days for retail customers. The monthly installation intervals in May and June were shorter for CLECs than retail customers in Zone 1 and were also shorter for CLECs in Zone 2 from March through June. *Id.*

With regard to delays caused by non-facility reasons, the average number of delay days fell from 17.35 in March to 6.00 in June in Zone 1 and from 11.57 days in March to 5.00 in June in Zone 2. *Id.* at 101-102, OP-6A. With regard to delays caused by facility reasons, this average number of delay days fell from 22.29 in March to 6.62 in June in Zone 1 and from 37.33 in March to 11.75 days in June in Zone 2. *Id.*, OP-6B. Qwest's wholesale performance with regard to delays caused by facility reasons was at parity with its retail

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performance in both Zones in each of these months. *Id*., OP-6B.

Similarly, the interval for completion of pending orders past the due date improved from 55.16 days in March to 47.74 days in April to 38.50 days in May to 23.65 days in June; in each month the interval was shorter for CLECs than for retail customers. *Id*. at 103, OP-15A.

In terms of the quality of Qwest's installation of ISDN capable loops, the average trouble free rate in the aggregate from March through June for both CLECs and retail customers was 94%. *Id.* at 103, OP-5.

***Repair of ISDN Capable Loops*.** In the aggregate, the average trouble rate for ISDN loops provisioned to CLECs from March through June as 1.4%, while the retail equivalent was 2.1%. In each of these months, the wholesale trouble rate was lower than retail, although the retail trouble rate was never higher than 2.30%. *Id.* at 107, MR-8.

Moreover, over the last four months, Qwest steadily improved its performance in promptly repairing CLEC ISDN-capable loops, improving from 85.11% cleared within 24 hours in March to 100.00% in June in Zone 1 and from 90.91% in March to 100.00% in June in Zone 2. *Id.* at 105-106, MR-3. Wholesale results were at parity with retail results in Zone 1 in June and in Zone 2 from April through June. *Id.* In the aggregate, Qwest cleared 97.45% of all CLEC trouble reports within 48 hours in those months statewide (and 100% in Zone 2 in particular). *Id.* at 105-106, MR-4. In both Zones, the mean time to restore CLEC service has steadily improved, falling from 9 hours, 11 minutes in March to 4 hours, 7 minutes in June in Zone 1 and from 15 hours, 27 minutes in March to 2 hours, 14 minutes in June in Zone 2. *Id.*, MR-6. The CLEC repeat trouble rate also has improved, particularly in Zone 2, where the repair repeat report rate dropped from 36.36% in March to 9.09% in June. *Id.* at 106, MR-7. In May and June, wholesale and retail performance for all but one of these measures was at parity statewide. *Id.* at 105-106, MR-7.

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g. ADSL Qualified Loops

Installation of Unbundled ADSL Qualified Loops. ADSL-Qualified Loops are a specific type of non-loaded loop that allows for the provision of ADSL *(Asymmetric Digital Subscriber Line)*. These loops account for less than 1% of all unbundled loops in service in Washington. In Zone 1, Qwest met 84.62% of its CLEC installation commitments in March, 86.21% in April, 100.00% in May, and 96.15% in June. Qwest bettered the 90% benchmark in May and June. *Id.* at 108, OP-3. In Zone 2, Qwest met more than 80% of its CLEC installation commitments in March, April and May. *Id.* at 109, OP-3. In both Zones 1 and 2, Qwest met the six-day installation interval benchmark in three of the four months between March and June. *Id*. at 108-109, OP-4. In all four months, Qwest's wholesale performance on this measure exceeded its retail performance. *Id.* With regard to Qwest's ability to clear delays affecting CLEC installations, there is very little data in Washington. Region-wide, in Zone 1, the average number of delayed days for facility reasons was lower for CLECs than for retail installations in each months between March and June. *Exhibit 4* at 109, OP-6B. Similarly, region-wide Qwest achieved parity when the delays were caused by non-facility reasons. *Id.*, OP-6B. With one minor exception, the results were equally good in Zone 2. *Id.* at 110, OP-6A, 6B.[25]

With regard to the quality of Qwest's installations of ADSL-qualified loops for CLECs over 90% of all such installations in June were without trouble reports. *Exhibit 2* at 110, OP-5. Between March and June, 90.16% of installations were without trouble reports in the aggregate. *Id.* Those results were at parity with Qwest's retail service in March, May and June. *Id.*

Repair of Unbundled ADSL Qualified Loops. The trouble rate for CLEC loops ranged between 2.60-3.13% between March and June, while the trouble rate under the comparable retail measure averaged between 1.47-1.65% during the same period. *Id*. at 113,

[25] The exception occurred in May, when a facility problem delayed a single CLEC installation by 55 days. That result was anomalous; it was the first time in the last five months that a delay exceeded 10 days. *Exhibit 4* at 110, OP-6B. Moreover, the sample size in May was too small to be statistically meaningful.

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MR-8.

In terms of clearing CLEC trouble reports, in Zone 1, Qwest cleared 100.00% of CLEC out of service reports within 24 hours in March, April and May and 90.91% in June (10 out of 11). *Id.* at 111, MR-3. In all four months, Qwest's wholesale performance was at parity with retail. *Id.* Qwest also cleared 100% of all CLEC trouble reports within 48 hours between March and June. *Id.*, MR-4. The mean time to restore service was consistently lower for CLECs, and averaged in the aggregate 3 hours, 18 minutes between March and June. *Id.*, MR-6. Qwest also achieved parity for the repeat trouble rate in each month between March and June. *Id.*, MR-7.

In Zone 2, there were no trouble reports submitted for CLEC loops in or after March and, thus, there is no maintenance and repair data to review. *Id.* at 112, MR-3, MR-4, MR-6, MR-7.

h. Line Sharing

Line sharing allows Qwest and a CLEC to share the same loop, with Qwest providing voice service and the CLEC providing DSL service. Line sharing is comparable to what Qwest offers through its Qwest DSL product.

Nearly all line sharing installations for CLECs do not require the dispatch of a technician. In that category ("no dispatches"), Qwest met 94.57% of CLEC installation commitments in March, 88.21% in April, 97.76% in May and 97.67% in June. *Exhibit 2* at 123, OP-3. The average installation interval was less than five days in three of these months, with a low of 4.13 days in May and a high of 5.32 days in April. *Id.*, OP-4. This compares favorably with the 5-day provisioning interval contained in the interim and permanent line sharing agreements. When delays occur, they are short, averaging 5.40 days in the aggregate from March to June for non-facility delays and 8.82 days for delays caused by facility reasons. *Id.*, OP-6A, 6B. Qwest completed over 97% of all new installations without a CLEC filing a trouble report between April and June, up from 94.93% in March. *Id.* at 124, OP-5. Similarly, the interval for pending orders delayed past the due date fell

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from 58.40 days in March to 30.20 days in June. *Id.*, OP-15A.

With regard to Qwest's repair record, the rate at which CLECs reported trouble with Qwest installations was low and improving, falling from 1.50% in May to 1.22% in June. *Id.* at 128, MR-8. Qwest cleared 66.67% (2 of 3) of CLEC out of service reports within 24 hours in March and 100.00% in April, May, and June. *Id.* at 127, MR-3. Qwest cleared 97.22% of all CLEC trouble reports within 48 hours in the aggregate between March and June and 100% in June. *Id.*, MR-4. The mean time to restore service was under 4 hours in June. *Id.*, MR-6.[26] In sum, the unbundled loop performance results demonstrate that: (1) Qwest is providing its competitors with consistently high quality service for analog voice, non-loaded (2 and 4-wire) and shared unbundled loops which make up 90% of the current loops in Washington; (2) Qwest's results continue to improve for coordinated cutovers and the performance in Washington and in the region currently exceeds the level of performance accepted by the FCC when approving the Verizon New York 271 application; and (3) Qwest has steadily improved its performance in the provision of DS1, ADSL and ISDN capable loops.

5. Checklist Item No. 5: Unbundled Transport

Unbundled dedicated interoffice transport ("UDIT") is a transmission path between two particular points, including between Qwest central offices or between Qwest and the CLEC. As of June 30, 2001, Qwest had provided 11 CLECs in Washington with local transport from the trunk side of the CLEC switch unbundled from local switching or other services. CLECs had 242 UDIT facilities in service in Washington, including 122 DS1s and 120 DS3s. The number of UDIT facilities in service increased by 404% in Washington in the past 12 months.

DS1 UDIT Installation. In Zone 1, Qwest met 100.00% of its installation commitments for DS1 UDIT facilities in each month between March and June, in each

[26] Because Qwest had so few line sharing installations that required the dispatch of a technician, the performance results for dispatches are not meaningful. Nonetheless, the results are reported at pages 122 and 126 of *Exhibit 2*.

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month exceeding its retail performance under this measure. *Id.* at 131, OP-3. In all four months, the average CLEC installation interval was lower than the retail interval; it fell to just 3.00 days in June for CLECs. *Id.*, OP-4. In terms of the number of delayed days for facility and non-facility reasons, there is no data (due to the absence of any delays) in Washington. *Id.*, OP-6A, OP-6B. Region-wide, Qwest's wholesale and retail performance was also at parity. *Exhibit* 4 at 134, OP-6A, 6B.

As to Qwest's performance in Zone 2, there is too little data in Washington. *Exhibit 2* at 132, OP-3, OP-4, OP-6A, OP-6B. Region-wide, Qwest met 100.00% of its CLEC installation commitments in May and June. *Id.* at 135, OP-3. The average wholesale installation interval region-wide ranged from 7 to 9 days, far less than the retail intervals of 22-23 days. *Id.*, OP-4.

As to Qwest's installation quality in Washington, Qwest installed 92.31% (12 of 13) of all UDIT facilities without CLECs filing a trouble report in April, and 100.00% without a trouble report in March, May and June. *Exhibit 2* at 133, OP-5.

DS1 UDIT Repair. The overall trouble rate for DS1 UDIT facilities was low, dropping from 2.88% in March to 0.79% in April to 0.00% in May and June. *Id.* at 136, MR-8. In all four months, Qwest's wholesale and retail performance on this measure were at parity. *Id.* In terms of clearing troubles when they arise, in Zone 1, Qwest cleared 100.00% of all CLEC troubles within 4 hours. *Id.* at 135, MR-5 (Zone 1). Qwest only had 2 trouble reports in Zone 2 between March and June and the mean time to restore was 4 hours, 20 minutes. *Id.* at 136, MR-6. In March and April, the mean time to restore service to CLECs was at parity with Qwest's retail performance. *Id.* at 135-136, MR-6. In March and April, there were no CLEC repeat trouble reports in Zones 1 or 2. *Id.*, MR-7.

Above-DS1 UDIT Installation. Qwest achieved parity with retail performance under the "commitments met" PID for above-DS1 UDIT installation in each month between March and June in Zone 1 and in March and April in Zone 2 (there being no data for May and June). *Id.* at 137-138, OP-3. In Zone 1, the average CLEC installation interval dropped

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from 20.67 days in April to 5.00 days in June and was at parity with the average retail interval in each months between March and June. *Id.* at 137, OP-4. Qwest also achieved parity in the "delayed days" categories in Zones 1 and 2 for all months since March in which there is data in Washington. *Id.* at 137-138, OP-6A, OP-6B.

In terms of Qwest's installation quality, Qwest installed 100.00% of new above-DS1 UDIT facilities without a CLEC filing a trouble report in March, April and May and in June installed 7 out of 8 such UDITS without a CLEC trouble report. *Id.* at 139, OP-5.

Above-DS1 UDIT Repair. The CLEC trouble rate for above-DS1 UDIT transport averaged in the aggregate under 2% for the months of March through June. *Id.* at 142, MR-8. In terms of 'Qwest's repair record when CLECs report problems, there is very little data in Washington due to the low trouble rate. *Id.* at 141, MR-5 (Zone 1; Zone 2). Region-wide, in Zone 1, Qwest cleared 57.14% of CLEC trouble reports within four hours in April, 76.92% in May, and 80% in June. Qwest achieved parity with retail performance in both May and June. *Exhibit 4* at 144, MR-5. The mean time to restore wholesale and retail service was comparable in each month from March to June. In June, Qwest restored CLEC service, on average, in two and one-half hours. *Id.*, MR-6. The repeat trouble report rate was at parity for the last three months. *Id.*, MR-7.

In Zone 2, Qwest cleared all 4 CLEC region-wide trouble reports in May and June within four hours. *Id.*, MR-5. The mean time to restore service and the wholesale and retail repeat trouble rates were at parity. *Id.* at 145, MR-6, MR-7.

Dark Fiber. Thus far, CLECs in Qwest's region (or in Washington, more specifically) have not sought access to dark fiber in commercial quantities. The limited performance results reveal that Qwest met 100.00% of its CLEC installation commitments in Zone 1 in March and May, it had no orders in April and it met 5 of 6 installation commitments in June. *Exhibit 2* at 143, OP-3. The average installation interval ranged between 6.60-9.50 days in March, May and June, far better than the 20-day interval offered in Qwest's SGAT offering and agreed to by the CLECs. *Id.*, OP-4. The trouble rate for

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dark fiber installations for CLECs was 0.00% in March, April, May and June. *Id.* at 144, MR-8.

Collectively, these data show that Qwest is satisfying the statutory requirements for unbundled transport.[27]

6. Checklist Item No. 6: Unbundled Switching

To date, CLECs have submitted virtually no requests to Qwest for unbundled local switching on a stand-alone basis. The ROC determined that no performance measures for stand-alone unbundled switching were needed because there is virtually no demand for it. CLECs obtain access to unbundled switching as part of UNE-P facilities. Qwest's UNE-P performance results establish that Qwest can provide unbundled switching to CLECs upon request.

7. Checklist Item No. 7: 911/E911/Directory Assistance/Operator Services

In the last 12 months, CLEC demand for 911/E911, directory assistance, and operator services from Qwest has increased. As of June 30, 2001, the number of CLEC E911 trunks in service in Washington was 409, up 29% from one year earlier. CLECs had 100 directory assistance trunks in service in Washington, up 138% since June 2000. CLECs also had 401 operator services trunks in service in Washington, up 77% in the last 12 months.

a. 911/E911

The ROC adopted several PIDs for 911/E911 services; they include: (1) the time to update the E911 database; (2) various aspects of 911/E911 trunk installation; and (3) various aspects of 911/E911 trunk repair. Qwest's performance under these measures is discussed in turn below.

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[27] ILECs are required to provide unbundled shared transport only where they also provide unbundled switching. *See* UNE Remand Order ¶ 369. In compliance with this requirement, Qwest offers unbundled shared transport in conjunction with unbundled local switch ports and as part of its UNE-P offering. Shared transport is automatically provisioned when a CLEC orders switching unless the CLEC requests otherwise.

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E911 Database Updates. DB-1A (entitled "Time to Update Databases") measures the average time required to update the E911 database for all providers. DB-1A is a "parity by design" PID because the E911 database does not distinguish between updates for Qwest or CLECs.[28] Qwest does not manage its own E911 database. It utilizes the service of Intrado, Inc. ("Intrado"), a third-party entity which provides E911 database management services to all CLECs operating in the Qwest region in a manner that is competitively neutral. Facilities-based CLECs, which use their own switching facilities, send updates directly to Intrado.

In each month from March through June 2001, Qwest and CLECs updated the E911 databases in an average of 3.53 hours to 6.44 hours. The average time required to update the database varied with the number of E911 records processed in a given month. The more records processed, the longer the average update time. *Exhibit 2* at 145, DB-1A.

911/E911 Trunk Installation. Qwest had little regional or Washington data to report for 911/E911 installations in the months of March through June. In Washington, Qwest met its only CLEC installation commitment in March (in Zone 2) and missed its only commitments in April and May. There were no commitments in June. *Id.* at 146, OP-3 (Zone 1; Zone 2). With regard to installation quality in Washington, Qwest completed 3 of 4 new installations without a CLEC filing a trouble report in March and 100.00% without a trouble report in April, May and June. *Id.* at 147, OP-5.

Region-wide, the average installation interval in Zone 1 for CLECs was at parity with the retail average in March and April. *Exhibit 4* at 150, OP-4. Region-wide, in Zone 2, the results are not as positive. Qwest is investigating these results. *Id.* at 150-51, OP-3, OP-4.

911/E911 Trunk Repair. In March through June 2001, the trouble rate on CLEC trunks was low, averaging 0.46% or less in each month. *Exhibit 2* at 150, MR-8. Qwest resolved the few trouble reports efficiently, clearing 100.00% of all CLEC trouble reports

[28] The PID and how it is calculated is more specifically described at Exhibit 1 at pages 66-67.

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within 4 hours between March and June. *Id.* at 149, MR-5 (Zone 1; Zone 2). With only one exception, the mean time in any month to restore service never exceeded 1 hour, 48 minutes. *Id.* at 149-150, MR-6. The repeat trouble report rate was 0.00% in Zone 1 in April and May (there being no data for June) and 0.00% in Zone 2 in March and June (there being no data for April and May). *Id.*, MR-7.

b. Directory Assistance and Operator Services

The "Speed of Answer" PIDs for directory assistance (DA-1) and operator services (OS-1) measure the average time required for Qwest's operator and directory assistance personnel to answer calls. These PIDs are "parity by design" because Qwest's directory assistance and operator services systems handle all calls on a blind, first come, first served basis, and do not know whether a caller or a called party is a Qwest or CLEC customer. In March through June 2001, the speed of answer for directory assistance and operator service calls was, on average, between 7.79 and 9.37 seconds. *Id.* at 151, DA-1, OS-1.

8. Checklist Item No. 8: White Pages Directory Listings

The number of white pages listings for CLEC customers in Washington was 95,143 at the end of June 2001. The only PIDs for white pages directory listings measure the time required to update the white pages directory listings database and the accuracy with which Qwest completes those updates. DB-1C-1 and DB-1C-2, (entitled "Time to Update Databases") measure the average time required to complete electronically and manually processed updates. DB-2C-1 (electronic) and DB-2C-2 (manual) (both entitled "Percentage of Accurate Database Updates") measure the percentage of electronically and manually processed updates completed without errors. These PIDs are "parity by design" because Qwest processes CLEC end user listings using the same or similar systems, databases, methods, procedures, and personnel used by Qwest for its own retail end user listings.

Between March and June, Qwest completed electronically processed Washington updates to the directory listings database in an average of 0.05 to 0.07 seconds, with an accuracy rate of 95.33-96.30%. *Id.* at 152, DB-1 C-1; DB-2 C1. Qwest took longer to

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complete manually processed updates, but the accuracy rates for such updates were even higher. Specifically, Qwest completed manually processed updates to the directory listings database in an average of 135.73 to 148.11 seconds, with an accuracy rate of 98.97-99.43%. *Id.* at 152, DB-1 C-2; 153, DB-2 C2.

9. Checklist Item No. 9: Number Administration

Qwest ceased performing North American Numbering Plan ("NANP") numbering administration or assignment functions on September 1, 1998, when the FCC transferred those functions to Lockheed Martin, and subsequently to NeuStar, the current NANP Administrator. Before and after the transfer of numbering administration functions to the NANP Administrator, Qwest has complied with all industry guidelines and FCC rules applicable to carriers with respect to numbering administration.

The ROC's numbering administration PIDs measure Qwest's performance in activating NXX codes. PID NP-1A (entitled "NXX Code Activation") measures the percentage of NXX codes in the reporting period that are loaded and tested prior to the Local Exchange Routing Guide ("LERG") effective date or the "revised" effective date. Between March and June, Qwest loaded and tested 100.00% of CLEC NXX codes prior to the LERG effective date or the "revised" effective date. *Id.* at 154, NP-1A. PID NP-1B (entitled "NXX Code Activation – Facility Delays") measures the percentage of delays in activating NXX codes that are caused by Qwest interconnection facility delays. Between April and June, there were no NXX code activation delays in Washington. *Id.*, NP-1B. This is a dramatic improvement from 31.25% in March. *Id.*

10. Checklist Item No. 10: Call-Related Databases and Associated Signaling

Qwest offers all CLECs access to, and routing over, its call-related databases and associated signaling in the same manner that Qwest accesses those services. Qwest uses a queuing and routing system that treats all carriers alike. As of June 30, 2001, 7 facilities-based CLECs were purchasing access to CCSAC/SS7 signaling from Qwest within its

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region.

The performance measure for this checklist item is DB-1B, which evaluates the time to update the line identification database ("LIDB"). This is also a "parity by design" measure. Qwest's LIDB update process does not distinguish between updates for Qwest and updates for CLECs. The aggregate Qwest and CLEC result under that measure has consistently been less than 3.5 seconds in each month between March and June. *Id.* at 155, DB-1B.

11. Checklist Item No. 11: Number Portability

Number portability allows customers to change carriers without changing telephone numbers. As of June 30, 2001, Qwest had ported 239,812 numbers for Washington CLEC customers. The total of numbers ported increased by 154% over the last 12 months. Local number portability ("LNP"), the long term mechanized solution required by the Act, is available on 100% of all access lines in Washington and 99.7% of all access lines in Qwest's region. Number ports arise in one of two ways: (1) on a stand-alone basis; and (2) when the CLEC orders an unbundled loop from Qwest. The PIDs measure whether Qwest performs its required work activity under both situations.

The PIDs for number portability, OP-8B (entitled "LNP Timeliness with Loop Coordination") and OP-8C (entitled "LNP Timeliness Without Loop Coordination") measure the percentage of Line Side Attribute ("LSA") triggers (also referred to as unconditional 10-digit triggers) that Qwest translates ("sets") in the switch prior to the scheduled start time for unbundled loop cutovers that require coordination and for LNP orders that do not require loop coordination, respectively. When an LSA trigger is set prior to the start time for a loop cutover, the CLEC controls the activation of number portability on that loop without the need for any involvement by or coordination with Qwest.

Between March and June, Qwest set 95.83-99.22% of LNP triggers prior to the scheduled start time for coordinated loop cutovers in each month, exceeding the ROC's 95% benchmark. *Id.* at 156, OP-8B. During the same period, Qwest set 95.97-98.86% of LSA

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triggers prior to the scheduled start time for LNP orders not requiring loop coordination, again beating the 95% benchmark each month. *Id.,* OP-8C.

12. Checklist Item No. 12: Local Dialing Parity

Qwest provides dialing parity to competitors in its region. Calls to or from CLEC customers are completed with the same number of digits as calls to or from Qwest customers. No additional access codes are required. Customers of competing carriers also dial the same number of digits in the same dialing patterns that Qwest's customers use to access operator and directory assistance services. Specifically, both CLEC and Qwest customers dial "411," "1 + 411," or "1 + (area code) + 555-1212" to access directory assistance, and "0" or "0 plus" to access operator services. Similarly, both CLEC and Qwest customers dial "00" to reach their pre-subscribed long distance operator. The ROC has not drafted any performance measures for this checklist item. In Washington, the Commission has already found that Qwest is in full compliance with this checklist item. Workshop One Order, ¶ 80(10)

13. Checklist Item No. 13: Reciprocal Compensation

Reciprocal compensation refers to payments made between carriers for terminating local calls on behalf of the other. In June 2001, Qwest exchanged approximately 1.22 billion minutes of calls with CLECs in Washington, including nearly 1.12 billion minutes of local calls. From July 1, 2000 through June 30, 2001, Qwest paid CLECs well over $25 million for calls that originated on the Qwest side. During the same period, Qwest invoiced CLECs just under $3 million for calls the CLECs originated.

The ROC adopted two performance measures, BI-3B and BI-4B, with respect to reciprocal compensation. The "B" stands for a billing measure. BI-3 evaluates the accuracy with which Qwest bills CLECs. BI-3B focuses on reciprocal compensation based on minutes of use exchanged between Qwest and the CLEC, while excluding billing adjustments resulting from CLEC-caused errors. BI-4 measures the completeness of Qwest's bills for both non-recurring and recurring charges; thus, BI-4B measures the

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percentage of revenue associated with local minutes of use appearing on the correct bill. No data are excluded from this performance measure.

In Washington, Qwest improved its billing accuracy for reciprocal compensation from 82.32% in March to 99.65% in June, well above the ROC's 95% accuracy benchmark. *Exhibit 2* at 61, BI-3B. In terms of the completeness of Qwest's bills for reciprocal compensation, Qwest improved from 89.17% of CLEC traffic over Qwest's network in March to 93.69% in June. While Qwest did not reach the ROC's 95% benchmark in those months, its performance in May and June was very near the benchmark. *Id.* at 63, B1-4B.

14. Checklist Item No. 14: Resale

The resale provisions of the Act require Qwest to provide telecommunications services to CLECs at wholesale rates. As of June 30, 2001, 41 CLECs were reselling Qwest's telecommunications services in Washington. Qwest was providing a total of 33,115 resold access lines in Washington (11,572 business lines, 11,557 Centrex, and 9,986 residential lines), compared to a total of 33,316 access lines resold as of June 30, 2000. 20,874 additional lines have transitioned to UNE-P. As of June 30, 2001, Qwest also was providing 559 resold private lines in Washington (480 analog, 12 DS0, 66 DS1, and 1 DS3), compared to 344 lines as of last June.

The PIDs for resale disaggregate performance for twelve products: residential lines; business lines; Centrex; Centrex 21; PBX; Basic ISDN; Megabit; Primary ISDN; DS0; DS1; DS3 and higher; and Frame Relay. Products are disaggregated even further by no dispatch, dispatches within MSAs and dispatches outside MSAs. Altogether, there are hundreds of measures for resale each month. Qwest will discuss below the services that received approximately 99% of the orders in Washington from March through June: residential POTS, business POTS, Centrex and Centrex 21. Residential POTS is over 56%, business POTS is over 25%, Centrex is approximately 16%, and Centrex 21 is roughly 2% of the orders received from March through June. *Id.* at 160, 170, 180, 190, 199, 214, 227, 235, 244, 250, 256 and 262, OP-5.

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Installation. Most resale orders are provisioned without a dispatch in Washington. In each month between March and June, Qwest met over 99.00% of its commitments for residential POTS, 97.41-98.87% for business POTS, 98.84-100.00% for Centrex and 100.00% for Centrex 21. *Id.* at 159, 169, 179, 189, OP-3. When a dispatch was required within MSAs, Qwest met 92.93-99.12% of its commitments for residential POTS, 90.63-94.68% for business POTS, 91.23-93.33% for Centrex and 66.67(4 of 6)-100.00% for Centrex 21 in those same months. *Id.* at 157, 167, 177, 187, OP-3. For resale with a dispatch outside of MSAs, Qwest met 94.12-100.00% of its commitments for residential POTS, 78.57(11 of 14)-100.00% for business POTS and 100.00% for Centrex and Centrex 21 in the months between March and June for which there is data. *Id.* at 159 and 169, 157 and 167, and 158 and 168, OP-3. Intervals for POTS, whether residential or business service, are approximately 2-3 days when no dispatch is required, and approximately 3-4½ days within an MSA and approximately 2-6½ days outside an MSA when a technician dispatch is required. *Id.* at 157-159, 167-169, OP-4. In many instances, especially in the event of installations requiring a technician dispatch, Qwest's wholesale and retail results are at parity. *Id.*

Between March and June, 96.17-97.14% of residential POTS lines were installed without a CLEC filing a trouble report within 30 days; the same is true for 90.26-91.91% of business POTS installations, 91.95-95.78% of Centrex installations, and 70.00(7 of 10)-95.83% of Centrex 21 installations. *Id.* at 160, 170, 180, 190, OP-5.

Between March and June, across all four resale products, the number of delayed days for facility reasons was at parity to the extent there is data in Washington. *Id.* at 157-159, 167-169, 177-179, 187-189, OP-6B. With only one exception (Centrex in March), this is also true for delayed days for non-facility reasons. *Id.*, OP-6A.

Maintenance and Repair. The average trouble rate for CLECs between March and June was 1.22-1.80% for residential POTS, 1.20-1.53% for business POTS, 0.68-0.90% for Centrex and 0.62-1.51% for Centrex 21. *Id.* at 165, 175, 185 and 195, MR-8.

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All resold products are measured with either out of service cleared within 24 hours and all troubles cleared within 48 hours (MR-3 and MR-4) or the all troubles cleared within 4 hours (MR-5). The latter category tends to be high capacity services such as DS-3 or higher circuits. For resold residential POTS, business POTS, Centrex and Centrex 21, the 24- and 48-hour intervals apply. In the residential POTS, business POTS and Centrex service categories, from March through June, Qwest routinely cleared 87% or more of the out of service conditions within 24 hours and 93% or more of the out of service conditions within 48 hours. 100% of the Centrex 21 out of service conditions were cleared within 48 hours for these same months. With only a handful of exceptions, for all of these products this performance was not only outstanding, but substantially the same as, if not better than, equivalent retail service. *Id.* at 162-164, 172-174, 182-184, 192-194, MR-3, MR-4.

These results demonstrate that Qwest is reselling services on a nondiscriminatory basis. Accordingly, the Commission should find that Qwest is in compliance with checklist item 14.

IV. CONCLUSION

A review of Qwest's actual commercial performance is extremely telling. The data shows that Qwest is making each checklist item available in either substantially the same time and manner as the analogous retail service or such that an efficient CLEC has a meaningful opportunity to compete. This is true for installation activities, maintenance and repair and for traditional OSS functions. Thus, Qwest is making each checklist item available at an acceptable level of quality. This data, along with OSS testing data, should lead the Commission to conclude that Qwest has met its Section 271 obligations.

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RESPECTFULLY SUBMITTED this _____ day of September, 2001.

QWEST

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VERIFICATION

I, MICHAEL WILLIAMS, declare and state under penalty of perjury under the laws of the State of Washington that I am over the age of 18, and am otherwise competent to testify herein. By this declaration I verify the factual assertions in the foregoing pleading entitled "Qwest Corporation's Performance Data for Washington [July 2000-June 2001]" are true and correct statements to the best of my knowledge and belief, and, further, I adopt those as my sworn testimony in this proceeding.

Dated this ___ day of September, 2001, at Lincoln, Nebraska.

_____

Michael Williams

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