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**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In The Matter Of  
TEL WEST COMMUNICATIONS, LLC  
Petition For Enforcement Of Its Interconnection  
Agreement With Qwest Communications Pursuant  
To WAC 480-09-530

Docket No. UT-013097  
TEL WEST'S THIRD DATA REQUESTS  
TO QWEST (PART II)

Pursuant to WAC 480-09-530(4)(c) and WAC 480-09-480, Tel West Communications, LLC ("Tel West") submits this Third Data Requests to Qwest Communications. Please serve your responses, including requested documents, on Tel West at the offices of its attorneys, Miller Nash LLP, 4400 Two Union Square, 601 Union Street, Seattle, Washington 98101 within five (5) business days.

Please enter written responses on a separate page. If you are unable to answer a request, please indicate why you are unable. If you are able to answer only a portion of a request, answer that portion and state why you are unable to answer the remainder. Please state any qualifications to your answer. These data requests are intended to be continuing and to be supplemented to the time this proceeding is submitted to the Commission for decision. If your answer refers to information previously provided to Tel West, indicate the precise information by reference to data request response and page number.

DEFINITIONS

1. The words "you" or "your" or "Qwest" refer to Qwest Communications and its predecessor and affiliated corporations.

1           2. A request to “identify documents” means to supply sufficient  
2 information for each document or category of documents so that Tel West can determine  
3 whether such documents are available or have been produced.

4           3. The term “document” means any information, data, or graphic matter,  
5 fixed in any tangible medium of expression which can be perceived, reproduced, or  
6 otherwise communicated, directly or with the aid of a machine or device.

7                                       DATA REQUESTS

8           DATA REQUEST Tel West-037: Qwest’s response to Tel West-002  
9 (supplemental response) states that “[a]s a matter of Qwest’s policy, the representative is not  
10 permitted to [request nonstandard intervals] except in a few circumstances, including (most  
11 notably) medical emergency, disconnection in error or another company error.” Regarding this  
12 response, please provide the following information:

- 13           (a) Indicate whether Qwest ever departs from this policy. Provide all documents  
14 detailing the policy and departures from that policy.
- 15           (b) Indicate whether the service representative for Qwest or any other employee,  
such as a manger, can override these policies and procedures.
- 16           (c) State the frequency with which requests for non-standard intervals are denied  
17 for both Qwest’s own requests and Tel West’s requests.
- 18           (d) Admit that Qwest provisions nonstandard intervals for Tel West differently  
19 from the way it provisions nonstandard intervals for itself, and explain all the  
differences.

20                                       DATA REQUEST Tel West-038: Qwest’s response to Tel West-010S2 states  
21 that Aegis operates several customer service centers. Please fully describe Aegis and its  
22 relationship with Qwest. How does Qwest determine which CLECs/orders/calls go to an Aegis  
23 center? Produce all documents supporting your response.  
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1 DATA REQUEST Tel West-039: Confirm that all Qwest's responses to Tel  
2 West-001 to Tel West-012 are current, and that Qwest's response to Tel West-001 applies to the  
3 most recently available performance data. If not, please update your responses.

4 DATA REQUEST Tel West-040: Identify every step the Qwest retail division  
5 takes (and provide an associated screen printout for each step) to perform the order entry for the  
6 following actions listed below for its retail customers, and identify all systems used for each step  
7 of the process.

- 8 (a) New connection.
- 9 (b) Disconnection.
- 10 (c) Service change (e.g. add or drop a feature).
- 11 (d) Change of address.

12 For this response, the term "step" includes but is not limited to any keystrokes, fields to be  
13 populated, references to information or people, or any other actions taken to process these orders.  
14 For each of the fields, indicate which of the fields are auto populated. Identify all systems used  
15 for each step of the process.

16 DATA REQUEST Tel West-041: Identify every step a CLEC must take (and  
17 provide an associated screen printout for each step) to perform the order entry for the following  
18 actions for its retail customers when using IMA-EDI (and any associated systems):

- 19 (a) New connection.
- 20 (b) Disconnection.
- 21 (c) Service change (e.g. add or drop a feature).
- 22 (d) Change of address.

23 For this response, the term "step" includes but is not limited to any keystrokes, fields to be  
24 populated, references to information or people, or any other actions taken to process these orders.  
25 For each of the fields, indicate which of the fields are auto populated. Identify all systems used  
26 for each step of the process.

1 DATA REQUEST Tel West-042: Identify every step a CLEC must take (and  
2 provide an associated screen printout for each step) to perform the order entry for the following  
3 actions for its retail customers when using IMA-GUI (and any associated systems):

- 4 (a) New connection.
- 5 (b) Disconnection.
- 6 (c) Service change (e.g. add or drop a feature).
- 7 (d) Change of address.

8 For this response, the term "step" includes but is not limited to any keystrokes, fields to be  
9 populated, references to information or people, or any other actions taken to process these orders.  
10 For each of the fields, indicate which of the fields are auto populated. Identify all systems used  
11 for each step of the process.

12 DATA REQUEST Tel West-043:

13 For each of the order types listed in Tel West-040, indicate:

- 14 (a) How long it takes Qwest to enter and process these orders, on its retail  
15 system(s).
- 16 (b) What type of information the system(s) provides in response to an order, and  
17 whether this information is available in real time. "Real time" means immediately  
or while a customer is on the phone during order processing.

18 DATA REQUEST Tel West-044: For Qwest's responses in Tel West-040 to 042,  
19 provide all necessary supporting documentation to explain these steps, the associated systems  
20 and any acronyms used.

21 DATA REQUEST Tel West-045: For each of the following systems, describe the  
22 capabilities and information that the systems can provide in real time:

- 23 (a) Qwest's retail order processing system(s) described in Tel West-040.
- 24 (b) IMA-GUI.
- 25 (c) IMA-EDI.

1 DATA REQUEST Tel West-046: Indicate all steps necessary to convert/input  
2 data from the systems listed below into a format necessary to process the orders under RSOLAR,  
3 and indicate precisely how long the conversion process takes. If different processes are  
4 sometimes used (such as re-typing orders or using electronic flow-through), indicate the  
5 percentage of likelihood that a particular process will be used.

6 (a) Qwest's retail order processing system(s) described in Tel West-040.

7 (b) IMA-EDI.

8 (c) IMA-GUI.

9 DATA REQUEST Tel West-047: Provide all supporting documentation  
10 explaining the processes described in Tel West-046.

11 DATA REQUEST Tel West-048: Indicate how many orders (total and by type) a  
12 Qwest retail customer service representative can process in one day on average. Please provide  
13 the same information for Aegis customer service representatives, and any other customer service  
14 representatives that handle Tel West orders, inquiries or issues.

15 DATA REQUEST Tel West-049: Identify all the Interconnection Service Centers  
16 ("ISC") that handle Tel West orders, inquiries and issues. Indicate the likelihood (using a  
17 percentage) that a particular ISC will handle a Tel West order, inquiry, or issue.

18 DATA REQUEST Tel West-050: Please indicate whether under each of the  
19 following systems a user can request and receive a non-standard interval in real time. Please  
20 fully explain the facts supporting your response and provide explanatory documents.

21 (a) Qwest's retail order processing system described in Tel West-040.

22 (b) IMA-EDI.

23 (c) IMA-GUI.

24 DATA REQUEST Tel West-051: Describe all the information provided in a firm order  
25 commitment ("FOC") and how long it takes for a CLEC to receive this information. Describe  
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1 how long it takes for a Qwest retail representative to obtain each type of information contained in  
2 a FOC and the method and format received.

3 DATA REQUEST Tel West-052: Provide complete job descriptions for each of  
4 the wholesale jobs listed in Qwest's response to Tel West-008 and Tel West-010. Limit your  
5 response to jobs that directly or indirectly deal with Tel West orders and inquires.

6 DATA REQUEST Tel West-053: Qwest's Answer to Tel West's First Amended  
7 Petition for Enforcement states Qwest's position that the performance results in OP-4C show that  
8 Qwest is provisioning at parity. Explain the reasons (and identify all relevant supporting facts)  
9 for the difference between the installation intervals (for each month listed) for Tel West and  
10 Qwest listed on the most recently available version of OP-4C, regardless whether Qwest believes  
11 the results are statistically significant. Fully explain whether these differences are due to any  
12 Qwest actions, including but not limited to changes in policies, processes or removal of barriers  
13 and describe such actions.

14 DATA REQUEST Tel West-054: Indicate the differences between the Qwest  
15 retail division's access (ability to call, e-mail, etc.) to Qwest Network Services, and Tel West's  
16 access to Qwest Network Services. This includes but is not limited to whether access is direct or  
17 through a ISC or Qwest representative, the amount of time it takes to obtain access, the amount  
18 of information that Network Services makes available to Qwest and Tel West, and whether  
19 Network Services prioritizes Qwest's or Tel West's inquiries and orders.

20 DATA REQUEST Tel West-055: List all the systems listed in Qwest's response  
21 to Tel West-005 to which Aegis has access. List any other Qwest systems to which Aegis has  
22 access.

23 DATA REQUEST Tel West-056: Please state all facts supporting Qwest's  
24 assertion that Tel West fails to state a claim upon which relief can be granted, as stated in  
25 Qwest's answer to Tel West's First Amended Petition.

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1 DATA REQUEST Tel West-057: Please provide all facts and documents  
2 supporting Qwest's claims that Tel West's claim is barred for lack of jurisdiction.

3 DATA REQUEST Tel West-058: Please provide all facts and documents  
4 supporting Qwest's claim in its answer to the First Amended Petition that injunctive relief is not  
5 available to Tel West.

6 DATA REQUEST Tel West-059: Please provide all facts and documents  
7 supporting Qwest's claim that Tel West's claims are barred by the doctrine of estoppel, as stated  
8 in Qwest's answer to Tel West's First Amended Petition.

9 DATA REQUEST Tel West-060: Please provide a location and time when Tel  
10 West may visit a Qwest customer service center in the Seattle Washington area to observe the  
11 processing and timing for entry of at least five of each of the following types of Qwest retail  
12 residential customer orders: New installations without dispatch, new installations with dispatch,  
13 disconnection of service. It is understood that the observations will be subject to the protective  
14 order, and that no record will be made of any customer-specific data. Further, Tel West would  
15 be able to reciprocate with a visit to Tel West's Seattle office to view entry of the same types and  
16 numbers of orders.

17 DATA REQUEST Tel West-061: Please provide a comparison of number of order  
18 errors that originate from IMA compared with SONAR, by totals, percentages, and any other data  
19 available.

1 DATA REQUEST Tel West-062: Please describe upfront edits that are required  
2 to process IMA orders into SONAR and/or RSOLAR.

3 DATED this 13<sup>th</sup> day of March, 2002.

4 MILLER NASH LLP

5 

6 Brooks E. Harlow

7 WSB No. 11843

8 David L. Rice

9 WSB No. 29180

10 Attorneys for  
11 Tel West Communications, LLC

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