

**WRITTEN SUMMARY REGARDING QWEST'S PROPOSED PROCESS FOR  
QWEST CHANGES TO PRODUCT, PROCESS, AND TECHNICAL  
DOCUMENTATION**

**SUBMITTED TO CMP & CMP RE-DESIGN TEAM**

**BY CMP PARTICIPANTS ALLEGIANCE, AT&T, COVAD, ESCHELON,  
INTEGRA, SPRINT, AND WORLDCOM**

September 25, 2001

Allegiance, AT&T, Covad, Eschelon, Integra, Sprint, and WorldCom (the "joining CLECs") submit this Summary to the CMP and CMP Re-Design Team for consideration and in preparation for additional discussions of changes to Qwest's proposed process for Qwest changes to product, process, and technical documentation and publications. At the September 19<sup>th</sup> Change Management Process ("CMP") meeting, Qwest reviewed with Competitive Local Exchange Carriers ("CLECs") a presentation relating to its proposed process for changes to its documentation. At the meeting, Qwest was asked to temporarily stop its unapproved activities until a process was established that reflected CLEC comments. Qwest was also asked, when re-commencing with an established process, (i) to start over with the changes made to date to ensure that changes are properly submitted to CMP, (ii) that all changes (including those already discussed on calls) be highlighted (in green) in documentation, (iii) that proper procedures be applied to the communications, and (iv) that technical publications and other documentation be included in the process (in addition to the Product Catalog). We believe that Qwest had agreed to this approach and would focus on creating an interim process to meet CLEC needs. On September 24<sup>th</sup>, however, Qwest distributed a mailout<sup>1</sup> in which it scheduled a meeting to discuss this issue in October and said: "In the meantime, Qwest will continue to publish documents *using the current processes in place*" (emphasis added). The fact is that there is no "current process." Qwest made a proposal and CLECs want it improved before it is implemented. Qwest should reconsider its statement, stop the approach that it has implemented on its own, and create an interim process collaboratively with CLECs before proceeding with changes to the Product Catalog, technical publications, or other documentation. Qwest's current approach is inconsistent with the Stipulation that Qwest entered into in several states in the 271 workshops (the "Stipulation").<sup>2</sup> For example, as

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<sup>1</sup> Despite discussion of this issue in the September 19<sup>th</sup> CMP meeting, the mailout was not distributed to the entire CMP distribution list.

<sup>2</sup> WorldCom provided the Stipulation to the other participants of the CMP Re-Design Team during the September 5-6, 2001, Re-Design session. The Stipulation provides: "Qwest agrees that, within 45 days of closing a workshop, it will update its technical publications, product catalog (also known as the IRRG), and product documentation for CLECs to reflect the agreements made in the workshop and to make Qwest's documentation consistent with its SGAT. Qwest will then submit the updated technical publications, product catalog, and product documentation to the Change Management Process (CICMP). When Qwest submits the documents to CICMP, Qwest will file a notice in this proceeding indicating that the documents have been updated and how to obtain copies. Qwest will take affirmative action following the close of a workshop to communicate to appropriate personnel and to implement the agreements made in such

discussed below, Qwest has suggested (and is, in effect, maintaining) a self-imposed 30-day deadline for receipt of CLEC input that is not contained in the Stipulation. Because Qwest's proposed process is inadequate for all of the reasons discussed in this Summary, the joining CLECs will not agree to any particular review period at least until an effective process is collaboratively developed.

### **Insufficient Notice and Documentation**

On July 18, 2001, Bill Campbell of Qwest reviewed a 7-page bullet-point presentation with CLECs at the CMP meeting on the topic of changes to Qwest's Product Catalog and technical publications. The presentation was not listed on the agenda, and the written presentation was not included in the CMP Distribution Package that was distributed before the meeting. Other than the high level, 7-page presentation, Qwest provided no methods and procedures or other written documentation for the proposed process. CLECs did not have adequate notice of the subject or content of the September 19<sup>th</sup> CMP discussion. Such notice is useful for ensuring that the proper CLEC representatives are present and have had an opportunity to prepare for the discussion. At the meeting, Mr. Campbell asked for CLEC opinions about the best manner in which to proceed with communicating information about changes in the Qwest Product Catalog and technical publications. Although CLECs did not have an opportunity to prepare to comment, they attempted to address Mr. Campbell's request. It has become clear since then, however, that CLECs were given insufficient information to realize the context and meaning of the changes and the request for input, the volume of information to be distributed, and the effect of the comments they were asked to provide at that meeting. Mr. Campbell's presentation was at a high level. Rather than communicate the specifics of a process to be implemented, Mr. Campbell conveyed a general message that Qwest would work with CLECs to produce a consensus-driven process. Such a process has not developed.

### **Problems With Implementation of Current Approach and Proposal**

After the July 18<sup>th</sup> CMP meeting, Qwest proceeded with conference calls during which Qwest has described changes to its Product Catalog. There are no conference calls to discuss changes to technical publications. Although the conference calls to discuss the Product Catalog were described as informational (to describe changes being made), some notices for the calls have indicated that CLECs must comment on the proposed changes within 30 days. In the meantime, the changes appear to go into effect. If there is a process for addressing and incorporating CLEC comments (other than to simply receive such comments), it was not communicated to, or documented for, CLECs.

The current approach and Qwest's proposal are insufficiently organized and coordinated to handle the sheer volume of changes that Qwest is attempting to address in an insufficient amount of time. To illustrate the problem, one of Qwest's recent mailout notices is attached as Exhibit A. The notice indicates that a technical publication has

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workshop. Qwest acknowledges that any commission order or report recommending that Qwest meet a checklist item will be conditioned on Qwest's compliance with this commitment."

been updated. No information is given in the notice regarding the nature of the “updates.” The notice refers CLECs to Qwest’s wholesale web site, where the technical publication is posted. The posted document is 288 pages long and very technical in nature. There is no highlighting or other indication anywhere in the document as to what “updates” have been made. The source or reason for any changes is not given.<sup>3</sup> Instead, the mailout states that “these updates reflect current practice.” This statement suggests that substantive changes to practices that CLECs have been accustomed to using have not been made, when that may not be the case. This 288-page document is only one of those to which CLECs are supposed to respond within overlapping 30-day time periods. When CLECs are being inundated with such information, in apparent random order, this is insufficient time. This is particularly true because CLECs need to not only understand the changes but train their employees on them as well.

The mailout notice in Exhibit A also provides insufficient notice as to the process, the need for comments, and the effect of any failure to comment. The notices states the “Your comments . . . are very important to QWEST prior to the issuance of any tariff actions.” It is unclear what this means. The statement implies, however, that the next step is the filing of a tariff by Qwest, rather than submission of the issues to CMP. Qwest “reserves the right to revise this document for any reason, including but not limited to, conformity with standards by various governmental or regulatory agencies; utilization of advances in the state of the technical arts; or to reflect changes in the design of equipment, techniques, or procedures described in the technical publication.” Again, there is no indication that Qwest will submit such revisions to CMP, and the language implies the changes will be unilateral. The mailout goes on to state that “there are additional changes that will be forthcoming as a result of ongoing regulatory activities.” The mailout also states that, with respect to future changes, “wholesale customers will receive written notification announcing the upcoming change.” Because it states that the changes will simply be “announced,” rather than submitted to CMP for consideration, the language again suggests that the changes are unilateral changes that will be made and distributed as is. In addition, the mailout states: “Effective Date: Immediately.” Together, these statements, without further explanation, discourage CLEC feedback, because it appears that changes will be made to the documentation anyway with little or no opportunity for CLECs to affect the result. Consistent with that impression, the mailout states that “Customers *will* be able to receive a *final* published technical publication after November 12, 2001” (emphasis added). This date is only seven days after the deadline for CLECs to submit comments on the updates. The time frame does not suggest any substantive review or serious consideration of CLEC comments

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<sup>3</sup> As Qwest knows, the request to provide a source and explanation was made before any of the recent changes were made and related conference calls held. AT&T and WorldCom point out that Qwest agreed to provide this information in 271 workshops in Washington in April and July. Nonetheless, Qwest has proceeded with distributing product and technical publication changes without this promised information. The work that now needs to be re-done, which will cause delay and unnecessary resource expenditures for all, could have been avoided if Qwest had provided the agreed upon information as changes were being distributed, and worked with CLECs **in advance** to establish a collaboratively agreed upon process for making and distributing changes to documentation. Given that Qwest committed to providing this information and establishing a process for documentation changes approximately five months ago, there is no reason that an effective process could not have been fully developed earlier.

submitted in the intervening seven days. CLECs cannot obtain changes to Qwest's documentation by sending a notice to the CMP distribution list and "announcing" a change, to be effective within 45 days, even when the change has been ordered by a regulatory agency. The CMP has processes in place to deal with regulatory orders, and the Re-Design Team is also reviewing and re-designing those processes. Qwest's notice does not even state that the changes that are the subject of the mailout are required by a regulatory order, and it does not cite to any other source for the particular changes.<sup>4</sup> Even assuming the changes were required by a regulatory order, the CMP deals with the procedures for making such changes. The process outlined by Qwest in its mailout is completely inadequate, as well as inconsistent with the Stipulation's requirement to submit such changes to CMP.

The mailout in Exhibit A is a typical example of the pressures that Qwest places on CLECs because of the timeline that Qwest has imposed on itself (for obtaining 271 approval). In doing so, the process to change documentation is not truly collaborative. When Qwest issues a product notification today, Qwest requires CLECs to adhere to the process within 30 or 45 days, or less, but it provides no documented process for obtaining and incorporating input from CLECs. There is no guarantee from Qwest that it will take into account CLEC input before product or process rollout. As an example, WorldCom submitted comments by email regarding Qwest Line Splitting Product Notification PDRN051801-2 on July 12, 2001. More than two months have passed, and Qwest has not responded. Meantime, the product changes appear to have gone into effect without consideration or modification in light of WorldCom's comments.

In addition to comments on the notices themselves, CLECs have contacted Qwest with feedback on Qwest's approach to documentation of the change process. Qwest indicated, at a September 19<sup>th</sup> CMP meeting, that some of the CLEC representatives not present have provided positive feedback about the Product Catalog conference calls. Eschelon indicates that some of its representatives have indicated that they have learned new information on the calls, and they appreciate the information. The standard, however, should not be whether any information at all was gained (*i.e.*, something is better than nothing). An effective process is needed not only for communicating information but also for ensuring that the information is complete and reaches all interested parties with adequate notice and for addressing and incorporating feedback about the proposed changes.

Eschelon has contacted Mr. Campbell directly (as well as notified the CMP Director) about its concerns about the manner in which the changes have been addressed. After an initial conversation, Eschelon followed up with written concerns, to which Mr. Campbell did not respond. Eschelon had to request a schedule of conference calls, so that it could plan which of its employees needed to participate in each call. Only after some effort did Qwest provide such a schedule. Even then, Qwest sometimes changes the agenda for a particular call, so that the correct CLEC personnel are not on the calls. Notice is too short to react appropriately to such changes. Eschelon also pointed out that the mailouts regarding the conference calls are buried in numerous mailouts about other

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<sup>4</sup> See footnote 3.

issues, so that it is difficult to identify them. The Product Catalog calls appear to be in random order, and it is unclear how many total calls or changes are anticipated. Generally, only one call at one time and date, which is unilaterally scheduled by Qwest, is scheduled for each subject matter. If a CLEC representative is not available, that person does not have another opportunity to participate. Qwest does not provide detailed agendas or identify the Qwest participants and their roles before the calls, nor does it routinely provide minutes after the calls. To date, Qwest has not even highlighted the changes in the documentation, so CLECs cannot readily discern which of the information provided has changed. Eschelon has had difficulty opening some of the documentation provided. Qwest indicated that it was an Eschelon-specific problem, but Eschelon's Service Manager at Qwest was also unable to access the information before the applicable conference call. If the documentation was provided earlier, such issues could be addressed before the calls. Eschelon asked Qwest to provide a firm schedule for all upcoming conference calls to discuss changes to documentation and to publish and circulate the documentation for the calls at least two weeks before each call.

At recent CMP Re-Design Meetings, Allegiance, AT&T, Covad, Eschelon, Integra, Sprint, and WorldCom asked about the process being used by Qwest for changes to documentation, such as the Product Catalog and technical publications. CLECs pointed out that the need for an improved process was urgent, because many of the conference calls and notices relating to such changes are already being distributed, without Qwest-CLEC consensus on the appropriate process to address such changes. Qwest said that Susie Bliss of Qwest would provide a presentation, at the September 19<sup>th</sup> CMP meeting, regarding Qwest's proposed interim process (to be used until the CMP Re-Design Team can develop a long-term process). Although Qwest knew of this plan before the Distribution Package for the September 19<sup>th</sup> meeting was distributed to CLECs, Qwest did not include the presentation on the written agenda. Qwest handled it as a "walk on" item, which means there is no notice in the written materials that the issue will be addressed at the meeting. Although CLEC concerns had been raised before the September 19<sup>th</sup> meeting, the "proposed" process described by Qwest was simply the one already in place (with the exception of a plan to begin highlighting the changes in green in the documentation, on a going forward basis).

#### **The Qwest 4-Page "CLEC Documentation Proposed Beta Test" Presentation (September 19, 2001, CMP Walk-On Item)**

At the September 19<sup>th</sup> CMP meeting, Susie Bliss of Qwest reviewed a 4-page, high level presentation with CLECs. The 4-page document was not included in the Distribution Package in advance of the meeting but was sent separately by email to the CMP distribution list on the day of the meeting. The subject line of the email referred to the document as a "handout" with no indication of the subject matter of the handout. Other than the 4-page presentation, Qwest provided no methods and procedures or other written documentation for the proposed process.

At the September 19<sup>th</sup> CMP meeting, Qwest asked whether it was meeting the needs of CLECs. Eschelon said that it was not. At the meeting, Eschelon then listed the

problems it identified in the Qwest presentation. AT&T and Allegiance indicated that they agreed with Eschelon's concerns. No CLEC at the meeting took the position that Qwest's approach and proposal are adequate without revision. Since then, all of the CLECs joining in this Summary have indicated that they also agree with the concerns raised at the meeting. These problems are (in order of the 4-page presentation):

**Title ("CLEC Documentation Proposed Beta Test"):** If the title of the document and the subject line of the email distributing it had referred to Proposed Process for Changes to documentation such as Product Catalog and Technical Publications, CLECs would have had better notice of the subject matter of the discussion. More importantly, it is inaccurate to describe this process as a "Beta Test." No consensus has been reached on a process to be tested. At least some CLECs have recognized that an *interim* process may be needed until the CMP Re-Design Team has time to develop a long-term process for these changes. The need for an interim process is due to the volume of changes that are already being distributed and the problems encountered to date. Although an interim process, if agreed upon, could be viewed as a test for a long-term process (in the sense that successful elements could be adopted on a long-term basis), the process described by Qwest on September 19<sup>th</sup> was too flawed and contained insufficient detail to serve as such a test.

**"Proposed" process:** Qwest refers to its "Beta Test" as a "Proposed" process. Qwest has unilaterally implemented the process, however, without waiting for adoption of its "proposal." Changes are going into effect even before comment, much less approval, is obtained. The Stipulation provides that Qwest will "submit" the documents to CMP. The Stipulation is not limited to "notice" of changes to documentation, and it requires submission to CMP. This makes sense, given the manner in which this issue has developed. Qwest's initial draft SGATs included language essentially incorporating, by reference, outside documents (such as the Product Catalog and technical publications). CLECs objected that Qwest should not be able to incorporate in a contract documents that Qwest could unilaterally change. By making such changes, Qwest could, in effect, unilaterally change the terms of the interconnection agreement. Submission of the proposed changes to CMP was seen as a compromise between attaching all such documents (or addressing all such terms) and allowing Qwest to simply refer to them. It was viewed as at least some check on Qwest's ability to change contract terms without CLEC agreement. Thus, the Stipulation requires Qwest to "submit" changes to documentation to CMP. If merely notifying CLECs of a change, without any approval process, can meet that Stipulation, then the underlying need to prevent unilateral changes to contract terms has not been met. Therefore, the Stipulation must require more. *Qwest must submit changes to the CMP, rather than simply using the CMP distribution list as a mailing list for virtually unilateral changes.*

**"One size fits all" and "Beta Test" versus "Interim" Process:** Ms. Bliss said that Qwest was attempting to develop a "one size fits all" approach. This should not mean that one process should be used for all types of changes (and Ms. Bliss does not appear to have meant this). There may be differences in the appropriate process, depending on whether a Change Request is initiated by CLECs, Qwest, industry

organizations, regulatory bodies, *etc.* If an *interim* process is established for changes to documentation, it will be established to recognize a current, unusually high volume and pressing need. Such an interim process should be used *only* for regulatory-initiated changes, which are the changes currently driving the request for an interim process. Qwest should identify the source of the regulatory-initiated changes,<sup>5</sup> and a process should be established in the event that CLEC(s) disagree that the change has been ordered by a regulatory agency. By allowing CLEC input on the interpretation of the regulatory order before the change is made, all parties will avoid delays in implementing the appropriate regulatory order. If Qwest is initiating other changes to its documentation, those changes should be submitted as written Change Requests, just as CLEC-initiated Change Requests must be submitted to CMP. Although it is likely that regulatory changes will also, ultimately, be submitted as Change Requests under the process being developed the CMP Re-Design Team, CLECs have been willing to discuss an interim process to recognize the current volume of changes and regulatory orders stemming from pending 271 proceedings. Although CLECs have been willing to discuss accommodating Qwest's desire to make such changes expeditiously to assist in gaining 271 approval, these changes cannot be made without proper safeguards and at the expense of CLECs.

**Purpose of the September 19<sup>th</sup> discussion/Technical Publications:** Ms. Bliss indicated that the process described in her presentation addressed changes to the Qwest product documentation but not technical publications. CLECs rely upon technical publications to validate appropriate ordering requirements required by Qwest. As such, a collaborative process is needed for technical publications as well. As discussed above, the approach being used for technical publications today (*see* Exhibit A) is unworkable. A collaboratively developed process is needed to avoid such problems.

**Clarity as to what is changed:** To date, the discussions of changes to the Product Catalog have been confusing because it is unclear what has changed and the source of the change. Ms. Bliss said that Qwest would begin to show changes to the language in documentation by adding green highlighting to the documents where changes have been made. Qwest was asked to go back to the changes previously addressed in conference calls that have already occurred and provide those changes in green as well and then have new discussions when it is clear what has changed. Qwest should not only highlight the change in green but also reference the source of the change.<sup>6</sup>

**Posting of changes on the Qwest web site:** Qwest refers, in the first bullet on page 3 of the presentation, simply to a web posting to communicate changes to the existing Product Catalog. Because the changes are not being distributed on any kind of regular schedule, CLECs have no notice as to when to look on the web site for such postings. Better scheduling, with more advance notice of a complete, firm schedule of definite subjects, would reduce some of this uncertainty. Even then, adequate email notice, with proper naming conventions to alert CLECs to the subject matter, may be required to ensure that CLECs are aware of relevant communications.

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<sup>5</sup> *See* footnote 3.

<sup>6</sup> *See* footnote 3.

**Commitment to presentation and discussion in CMP meetings (or, when necessary, on conference calls):** The presentation indicates, on page 3, that “Changes to existing Product or Process documentation (known as the Product Catalogues - PCATs) to be developed and posted to the Qwest Change Management web site for 30 day review by CLECs.” The presentation does not mention either the ongoing conference calls that are currently being held to disseminate information or routine submission to the CMP process. Instead, the presentation states only that “significant changes will be proposed through the CMP process.” The document does not define “significant,” nor does it indicate who decides whether the issues are significant enough for submission to CMP. Qwest entered into a Stipulation in several states in which it agreed to the following: “Qwest will then submit the updated technical publications, product catalog, and product documentation to the Change Management Process (CICMP).” The stipulation is not limited to “significant” changes. To date, such changes have not been submitted to CICMP (now “CMP”). Using the CMP email distribution list to provide notices or announce calls does not constitute submitting changes to CMP. When a CLEC requires a change, it must submit a Change Request. *Qwest needs to follow the CMP process as well.* If expedited treatment is needed because of regulatory requirements, a process should be established to deal with that.

Qwest had indicated that the number of issues and amount of time needed to discuss the proposed changes were too great for handling in 4-hour CMP meetings. Therefore, CLECs had requested such calls (assuming the calls would be properly noticed and managed), in addition to the written materials, to encourage discussion and understanding of changes. CLECs did not understand, at the time, that Qwest intended that the calls would replace submission of changes to CMP. Given the number of separate calls and difficulties to date in managing them, the calls have not worked as a means for properly addressing changes. The conference calls, as managed to date, provide inadequate notice of changes that have been unilaterally made.

The changes should be dealt with in CMP. Now that the parties have agreed to expand the CMP process to 2-day monthly sessions, adequate time should be available for doing so. At the meetings, Qwest should present the requested changes (using Change Requests), and genuine discussion should occur of the issues and any needed next steps. If a process is established to deal with some issues in separate conference calls, any such calls should be better managed. This includes establishing intervals for notice and other steps; providing adequate, meaningful notice of any agenda items or calls (such as sending the notice sufficiently in advance of the call to allow review of the materials, using clear naming conventions in the email to indicate the call’s subject matter, and not changing the agenda shortly before the call); providing a firm schedule of any upcoming calls so that CLECs have a bigger picture view and not merely separate notices of a call now and then; providing prior notice of the agenda and the names and titles of Qwest attendees; including appropriate subject matter personnel in any discussions; providing more than one time to receive information; providing working access to documentation with sufficient time to correct problems; and maintaining and distributing minutes/documentation of the discussions. If conference calls will be used, written documentation of these kinds of procedures should be provided.



**CLEC review and feedback:** Qwest's written documentation of its proposed process for CLEC review and feedback of changes is contained in four bullet points on page 3 of the presentation. As brief as it is, Qwest's description raises several issues:

**30-day limit on review:** In the first bullet point on page 3 of the presentation, Qwest indicates that CLECs will have 30 days for review of changes to the Product Catalog, after posting of those changes on the web site. Ms. Bliss added orally that, after 30 days, Qwest would be moving the changes to "final" status. Qwest provides no basis for the 30-day limitation. Qwest was allowed a longer period of time to physically prepare its updates to the technical publications than Qwest is providing to CLECs to substantively review them. In addition to all of the time during which Qwest has negotiated and prepared for changes to date, the Stipulation provided that Qwest would receive 45 days to "update its technical publications, product catalog (also known as the IRRG), and product documentation for CLECs to reflect the agreements made in the workshop and to make Qwest's documentation consistent with the SGAT." *After* that 45-day period, per the Stipulation, "Qwest will *then* submit the updated technical publications, product catalog, and product documentation to the Change Management Process (CICMP)" (emphasis added). The only time limitation in the stipulation applies to Qwest and its preparation of the updates. There is no basis in the Stipulation for limiting CLECs to 30 days for review of the voluminous information that is being provided to CLECs in a piecemeal fashion today. CLECs recognize that they may benefit from many of these changes, and they do want to establish an effective process to make those changes as quickly as possible. The process established by Qwest, however, does not do so effectively or with adequate opportunity for CLEC input.

**Form of CLEC comments and Role of CDOC:** In the second bullet point on page 3 of the presentation, Qwest states that: "CLEC comments/questions will be forwarded via email through the Qwest Project Management Organization (PMO) to a CLEC Documentation Oversight Committee (CDOC) for review and determination of next steps." Although discussions are or should occur during the CMP meeting (or, when necessary, separate conference calls), this language anticipates written comments. If comments are made during a conversation and noted in minutes, it is unclear why an additional email submission is necessary. Also, Qwest provided no definition or documentation relating to the CDOC, its role, its membership, its processes and procedures, any criteria it would use for consideration of comments and "determination of next steps," notification of decisions, or any other information. It also appears from this language that Qwest anticipates being the sole decision maker with respect to CLEC comments and "determination of next steps." The presentation contains no standards for decision making and no procedures for voting.

**"Minor" modifications:** In the third bullet point on page 3 of the presentation, Qwest states that "Minor modifications/corrections will be completed within 15

days of the end of the 30 day comment cycle.” As with the term “significant” in the next bullet point, Qwest provides no definition or criteria relating to its use of “minor,” nor does it state who decides whether a change is minor or how it will be implemented. An expedite process could be used for minor changes, but it should contemplate some presentation to CLECs and concurrence that the change is minor and should be made.

## **Conclusion**

Qwest should work with CLECs to develop a workable, consensus-driven process for submitting changes to documentation, including the product, processes, and technical documentation, to CMP. The CLECs joining in this Summary are willing to discuss an interim process to assist with handling regulatory-initiated Change Requests, but the process needs to consist of genuine submission to CMP and address the concerns raised by CLECs to date. Until such a process is developed, the joining CLECs expect Qwest to honor its commitment to cease the current unworkable process. Continuing along this process will simply create more work that will need to be re-done. Qwest needs to implement new procedures for changes that it has announced in the past few weeks, as well as for changes on a going forward basis. The joining CLECs have already devoted substantial resources to assisting Qwest in starting to re-design CMP, and they are committed to continuing to do so. But, responsiveness from Qwest is needed to ensure that a mutually satisfactory and beneficial process can be developed. Qwest can begin by ceasing its current approach to these changes, on a temporary basis, while an established, improved process is developed.

## EXHIBIT A

-----Original Message-----

**From:** mailouts@qwest.com [SMTP:mailouts@qwest.com]  
**Sent:** Friday, September 21, 2001 11:57 AM  
**To:** [...]  
**Subject:** Tech Pub: Update to #77386-G Interconnections & Collocation: Effective 9-21-01 Interim

[4,A <http://www.geocities.com/lchuck78/logo.gif>](http://www.geocities.com/lchuck78/logo.gif)

September 21, 2001

Qwest All Notices  
Eschelon Telecom Inc.  
730 Second Ave S #1200  
Minneapolis, MN 55402  
qwest.all.notices@eschelon.com

To: Qwest All Notices

**Announcement Date: September 21, 2001**  
**Effective Date: Immediately**  
**Document Number: TECH.09.20.01.F.77386-G**  
**Notification Category: Product, Network**  
**Target Audience: CLEC, Reseller, IXC, Wireless**  
**Subject: Update to Technical Publication**

QWEST has completed a "Final Draft" of Technical Publication 77386, Issue, and titled "Interconnections and Collocation For Transport and Switched Unbundled Network Elements and Finished Services." Your comments to this "Final Draft" technical publication are very important to QWEST prior to the issuance of any tariff actions. You may view the technical publication on the Internet at <<http://www.qwest.com/wholesale/notices/techPub.html>>. We recommend using Adobe Acrobat version 4.0 or newer. Click on PUB 77386.

QWEST requests that comments or correspondence on this technical publication be **completed prior to, November 5, 2001** and be directed to the following:

QWEST Corporation

Attn: Jeff Farra  
700 W. Mineral Ave. MN-G14.27  
Littleton, CO 80120

(303) 707-7117 voice or (303) 707-9498 fax

QWEST reserves the right to revise this document for any reason, including but not limited to, conformity with standards promulgated by various

governmental or regulatory agencies; utilization of advances in the state of the technical arts; or to reflect changes in the design of equipment, techniques, or procedures described in the technical publication.

Customers will be able to receive a final published technical publication after November 12, 2001 from QWEST by going to URL <http://www.qwest.com/techpub> <<http://uswest.com/techpub>> and downloading the PDF file.

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager, Pat Levene on 6126636265 or you may call Jeff Farra on 303-707-7117. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest  
[...]

Note: While these updates reflect current practice, it is important to note that there are additional changes that will be forthcoming as a result of ongoing regulatory activities e.g., collaborative workshops and state commission orders. As these changes are defined and implementation dates are determined, notice of additional updates will be provided accordingly.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.