

Qwest Corporation  
Law Department  
(612) 672-8905-Phone  
(612) 672-8911-Fax

Jason D. Topp  
Attorney



December 15, 2003

Dr. Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re: In the Matter of a Request by Eschelon Telecom for an Investigation  
regarding Customer Conversion by Qwest and Regulatory Procedures  
MPUC Docket No. P-421/C-03-616**

Dear Dr. Haar:

Enclosed for filing is the Compliance Filing of Qwest Corporation regarding the  
above-referenced matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'J. Topp', written over the printed name 'Jason D. Topp'.

Jason D. Topp

JDT/bardm

Enclosures

cc: Service List



In the Matter of a Request by Eschelon Telecom for an  
Investigation regarding Customer Conversion by  
Qwest and Regulatory Procedures  
Docket No. P-421/C-03-616  
Service List

W. Patrick Judge  
Briggs and Morgan, P.A.  
W-2200 First National Bank Building  
332 Minnesota Street  
St. Paul, MN 55101

Burl W. Haar (15)  
Executive Secretary  
MN Public Utilities Commission  
121 East Seventh Place, Suite 350  
St. Paul, MN 55101-2147

Linda Chavez (4)  
Telephone Docketing Coordinator  
MN Department of Commerce  
85 Seventh Place East, Suite 500  
St. Paul, MN 55101-2198

Julia Anderson  
Special Assistant Attorney General  
MN Office of the Attorney General  
445 Minnesota Street, Suite 1400  
St. Paul, MN 55101-2131

Michael J. Bradley  
Moss & Barnett  
4800 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402

Curt Nelson  
OAG-RUD  
900 NCL Tower  
445 Minnesota Street  
St. Paul, MN 55101-2230

Karen L. Clauson  
Director of Interconnection  
Eschelon Telecom, Inc.  
730 Second Avenue South, Suite 1200  
Minneapolis, MN 55402-2456

Janet Browne  
AT&T  
14<sup>th</sup> Floor  
1875 Lawrence Street  
Denver, CO 80202

David R. Conn  
McLeodUSA Telecom Development, Inc.  
P.O. Box 3177  
6400 C Street Southwest  
Cedar Rapids, IA 52406-3177

JoAnn Hanson  
Qwest Corporation  
200 South Fifth Street, Suite 390  
Minneapolis, MN 55402

Sandra Hofstetter  
AT&T/L&GA – Regulatory  
10157 Ivywood Court  
Eden Prairie, MN 55347

Lesley James Lehr  
WorldCom, Inc.  
638 Summit Avenue  
St. Paul, MN 55105

Dan Lipschultz  
Moss & Barnett  
4800 Wells Fargo Center  
90 South Seventh Street  
Minneapolis, MN 55402

Gregory Merz  
Gray, Plant, Mooty, Mooty & Bennett  
3400 City Center  
33 South Sixth Street  
Minneapolis, MN 55402

Harry L. Pliskin  
Covad Communications Company  
7901 Lowry Boulevard  
Denver, CO 80230

Jason Topp  
Qwest Corporation  
200 South Fifth Street, Room 395  
Minneapolis, MN 55402

Gregory L. Wilmes  
New Access Communications LLC  
Suite 350  
801 Nicollet Mall  
Minneapolis, MN 55402

**STATE OF MINNESOTA  
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

<b>LeRoy Koppendrayer</b>	<b>Chair</b>
<b>Phyllis A. Reha</b>	<b>Commissioner</b>
<b>Marshall Johnson</b>	<b>Commissioner</b>
<b>Gregory Scott</b>	<b>Commissioner</b>
<b>Kenneth A. Nickolai</b>	<b>Commissioner</b>

---

<b>In the Matter of a Request by Eschelon</b>	)	<b>Docket No. P-421/C-03-616</b>
<b>Telecom for an Investigation regarding</b>	)	
<b>Customer Conversion by Qwest and</b>	)	
<b>Regulatory Procedures</b>	)	
	)	

---

**COMPLIANCE FILING OF QWEST CORPORATION**

Qwest submits this compliance filing in response to the Commission's order issued and served by mail on November 12, 2003. Please note that Qwest is continuing to evaluate two items the Commission ordered Qwest to address. Despite significant efforts to provide the requested information within the 30 day time frame, Qwest is still gathering data on these two items and will supplement this filing as soon as possible.

This filing lists each requirement identified by the Commission and provides a response:

- (a) **Procedures for extending to all wholesale orders notice procedures alerting retail service representatives when they are dealing with wholesale orders, eliminating references to "porting" orders and "LNP [Local Number Portability] orders in the original compliance filing.**

Qwest will place a notice on all orders that are not currently blocked. This change will be implemented in the February 21, 2004 update to Qwest's systems.

- (b) Modification of the content of the notice alerting retail service representatives when they are dealing with wholesale orders to advise them to refer the customer to the new carrier and take no further action.**

Qwest has modified the notation consistent with the Commission order. This change will be a part of the February 21, 2004 update to Qwest's systems.

- (c) A detailed explanation of which retail service representatives will be blocked from making changes in wholesale orders, which retail service representatives will not be blocked from making changes in wholesale orders, and the reasons for distinguishing between these two groups of retail service representatives.**

Qwest's update to Consulting Plus blocks sales representatives that sell to consumer and small business customers from having access via consulting plus to any LNP and shared loop orders. Qwest's update will not block sales representatives that do not use Consulting Plus, namely sales representatives that handle large business accounts. All sales representatives are already blocked from having access to all other types of orders.

Retail service personnel that have a need to access LNP and shared loop orders for service purposes will still have access. Such access is necessary because LNP and shared loop orders require coordination between the different services provided to the customer by Qwest retail and CLECs. In order to address service issues that may arise it is important that such personnel have the ability to see the ordering information.

- (d) A feasibility report justifying any decision that it is not feasible to block all retail service representatives from making changes in wholesale orders.**

Qwest is still in the process of determining whether to block all orders. Qwest will supplement on or before December 22 with this information.

- (e) **Procedures for ensuring that Qwest acknowledges mistakes in processing wholesale orders using the following language: “Qwest acknowledges its mistake in processing this wholesale order. The error was not made by the new service provider.”**

Qwest agrees to insert this language. See Part (f) below.

- (f) **Procedures for extending the error acknowledgement procedures set forth in part (e) to all Qwest errors in processing wholesale orders.**

A competitive local exchange carrier provides written request to their service manager for acknowledgement of a mistake in processing a Wholesale order. The written request should include the following information: PON#, Service Order Number, billing telephone number, a description of the end-user impact and the ticket number associated with the repair of the impacting condition. It is expected that the competitive local exchange carrier has followed usual repair procedures to correct the service impacting condition before beginning the process of requesting Qwest acknowledgement of error.

When a service manager receives a request for error acknowledgement from a competitive local exchange carrier, an investigation process will begin. When this investigation results in agreement that Qwest erred, the service manager will provide written correspondence to the competitive local exchange carrier. The letter will include a recap of the pertinent information, i.e., PON#, Service Order Number, order due date and billing telephone number as provided in the competitive local exchange carrier request and the following statement, “Qwest acknowledges its mistake in processing this wholesale order. The error was not made by the service provider.”

- (g) **Procedures for communicating to line staff that time is of the essence both for the identifying errors in processing wholesale orders and for providing the acknowledgement set forth in part (e) and procedures for requiring the acknowledgement as soon as practicable after the cause of the error has been identified.**

All service managers will be advised through internal procedure updates and email that time is of the essence in processing such a request and will be advised that they should respond as quickly as is possible given the particular issue raised by the CLEC.

- (h) **Procedures for ensuring that acknowledgements appear on Qwest letterhead or other indicia to show that it is Qwest making the acknowledgement.**

Written responses acknowledging Qwest error will be provided with the Qwest identification.

- (i) **Procedures for providing the acknowledgement to the competitive local exchange carrier, who in turn may provide it to the end use customer, to prevent improper contacts with the other carrier's customer.**

Qwest service managers will be advised to provide the acknowledgement to the competitive local exchange carrier that makes the request.

- (j) **Procedures for preventing use of a confidentiality designation in acknowledgements, to ensure that the competitive local exchange carrier can provide the acknowledgement to its end use customer.**

The acknowledgment response provided by the service managers to the competitive local exchange carrier will not include a confidentiality statement. This instruction will be included in procedures provided to the service managers.



- (k) **Procedures for making the acknowledgement process readily accessible to competitive local exchange carriers, including procedures for identifying clearly the person(s) to whom requests for acknowledgements should be directed.**

External documentation will instruct the competitive local exchange carrier to make requests for acknowledgements directly to their service manager. Also included will be instruction for accessing the Qwest Customer Contact Information Tool to identify the assigned service manager if the requestor does not know to whom their request can be sent.

- (l) **Procedures for ensuring that persons designated to provide acknowledgements have been appropriately trained and have the authority to provide acknowledgements.**

Service managers will be provided direction for responding to all requests for acknowledgements. Service managers are authorized to provide acknowledgements for these requests.

- (m) **A proposal for including performance measures for Centrex 21 and linesharing services in performance measure PO-2 in the Long Term PID process, including submission of a proposal for such performance measures to the Long Term PID Administration Forum by the next filing deadline of November 6, 2003.**

Qwest submitted a proposal on November 6, 2003 consistent with this requirement.

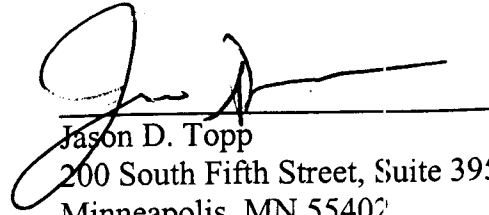
A copy of the proposal is attached.

- (n) **A proposal for reducing errors in processing manual wholesale orders, such as additional proof reading.**

Qwest will need to supplement this response with additional information. Qwest will do so as soon as possible.

Dated this 15<sup>th</sup> day of December, 2003.

**QWEST CORPORATION**



Jason D. Topp  
200 South Fifth Street, Suite 395  
Minneapolis, MN 55402  
(612) 672-8904

Attorney for Qwest Corporation