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**Jason D. Topp**  
Attorney



February 13, 2004

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 read "Jason D. Topp", is written over the typed name. The signature is fluid and cursive, with a large loop at the end of the last name.

Jason D. Topp

JDT/bardm

Enclosures

cc: Service List

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

LeRoy Koppendrayner	Chair
Gregory Scott	Commissioner
Marshall Johnson	Commissioner
Phyllis Reha	Commissioner
Kenneth A. Nickolai	Commissioner

**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**

**AFFIDAVIT OF SERVICE**

STATE OF MINNESOTA )  
 ) ss  
COUNTY OF HENNEPIN )

Dianne M. Barthel, being first duly sworn, deposes and says:

That on the 13th day of February, 2004, in the City of Minneapolis, State of Minnesota, she served the annexed filing of Qwest Corporation identified in the filing letter by either delivery in person, overnight delivery, or electronic mail followed by mailing to them a copy thereof, enclosed in an envelope, postage prepaid, and by depositing same in the post office in Minneapolis, Minnesota, directed to said addressees at their last known addresses.

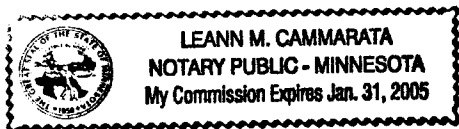
*Dianne M. Barthel*

Dianne M. Barthel

Subscribed and sworn to before me  
this 13th day of February, 2004.

*Leann M. Cammarata*

Notary Public



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

**LeRoy Koppendrayner  
Phyllis A. Reha  
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**Chair  
Commissioner  
Commissioner  
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Commissioner**

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

Qwest submits this supplemental compliance filing to address two issues that were not addressed in the compliance filing of December 15. The primary reason for delay in filing this supplement was our desire to provide system fixes to block retail access to wholesale orders in all of Qwest’s systems that serve Minnesota as suggested by the Commission. After a evaluation of the issue, Qwest has decided to make the system upgrades necessary to achieve that goal. This compliance filing addresses that issue as well as the other remaining issue in the November 12, order -- processes to help insure manual service order accuracy.

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

After investigating the system upgrades necessary to accomplish this request, Qwest will agree to make the requested system upgrades. These upgrades will require changes to a

number of service order processing systems, including SOLAR, SONAR and SWIFT. Qwest

believes it will complete this work by May 31, 2004. As a result of this work, retail sales representatives will not be able to access or modify any wholesale orders.

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

In evaluating the quality of Qwest's manual processing of orders, it is critical to note that Qwest's processes have been extensively reviewed and analyzed as a part of Qwest's various 271 proceedings. In those proceedings the FCC has determined that Qwest's orders are manually processed in an accurate fashion.<sup>1</sup> Among the measures Qwest has adopted (on an interim basis) to ensure manual service order accuracy is PID PO-20. PO-20 evaluates the degree to which Qwest accurately processes local service requests ("LSRs") that are electronically submitted but fall out for manual processing by measuring the percentage of Qwest service orders that are populated correctly, in specified data fields, with information obtained from CLEC LSRs. It is worth noting that when Qwest's PIDs were being designed, CLECs agreed to a complete set of PIDs that did not include a measure to evaluate Qwest's manual service order accuracy.<sup>2</sup> Nevertheless, in response to issues raised by CLECs at the conclusion of the ROC Third Party Test, Qwest agreed to develop and implement PO-20.

As the chart below demonstrates, from March and June of 2003, Qwest accurately processed over 96.15% of Resale and UNE-P POTS LSRs and over 97.27% of Unbundled

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<sup>1</sup> See *Qwest 9-State 271 Order* at ¶ 98.

<sup>2</sup> The PIDs in Minnesota, Arizona and the ROC states were agreed to by all parties with the exception of a few impasse issues, none of which related to the addition of a service order accuracy PID. See *Qwest I WorldCom Comments*, Lichtenberg Decl. at ¶ 43 (CLECs "agreed that no service order accuracy measure is necessary").

Loop LSRs each month that fell out for manual processing. Qwest's performance under PO-20 is measured on a region-wide basis.

<b>Commercial Performance Results Under PO-20</b>		
<b>MONTH</b>	<b>RESALE/UNE-P</b>	<b>UNBUNDLED LOOPS</b>
March	96.21%	97.62%
April	96.15%	97.27%
May	97.50%	97.86%
June	99.20%	97.86%

In response to CLEC input on PO-20 (and pursuant to the standard practice being adopted for new PIDs and PID modifications), Qwest has requested that PO-20 be addressed in the Long-term PID Administration ("LTPA") process. Qwest has had numerous LTPA meetings to address this. Following the first LTPA meeting, which took place on October 3, 2002, the LTPA has met informally ("ad hoc") (mostly via teleconference) to discuss enhancements and revisions to Qwest's order accuracy and installation quality measures. During these meetings, Qwest and CLECs have exchanged considerable information. Most recently, the parties have discussed expanding the list of fields reviewed by PO-20 through a phased approach, mechanizing comparisons within PO-20 to allow all manually handled orders for reported products to be included in the measure (rather than just a sample), and developing a means for CLECs to report errors before those errors affect the end users or to report errors for fields not included in the mechanized review. Based on LTPA collaboration, revised drafts of PO-20 have been created and circulated. The parties are continuing to negotiate the remaining issues – such as how to account for LSR/Service Order differences when those differences are the result of verbal changes from the CLEC or because of Qwest processing requirements. While PO-20 is under discussion, Qwest will

continue to report its manual service order accuracy performance under PO-20's current definition.

Clearly, the small number of human errors Qwest makes when manually processing service orders are within a reasonable tolerance level. Nevertheless, Qwest has taken – and continues to take – quality assurance measures directed at reducing the number of human errors in processing. These measures were detailed for the FCC in connection with Qwest's Arizona 271 application and should provide ample evidence that Qwest is taking significant and appropriate measures to address manual service order processing issues on a continual basis.

The first line of defense is the IMA edits. Qwest implements additional edits in every release of IMA, attempting to focus on those errors that are most prevalent on CLEC LSRs. The implementation of further edits at the front end of each transaction prevents Qwest's service delivery coordinators ("SDCs") from receiving as many incomplete or inaccurate LSRs that would otherwise make it through the gateway. This, in turn, reduces the potential for manual processing errors by the SDCs. It also provides immediate feedback to CLECs so they understand what is wrong and can resubmit a corrected LSR.

Qwest has implemented – and plans to continue to implement – enhancements in its Flow-Through System to improve electronic flow-through rates. Two-thirds of CLEC orders are now processed on a flow-through basis, and Qwest expects this trend to continue over time. Enhancements to Qwest's flow-through system is but one in a series of improvements Qwest continues to make to ensure that, to the extent possible, manual processing is kept to a minimum.



In addition to implementing system changes, Qwest has put in place an extensive quality assurance program to ensure that LSRs that drop out for manual processing are processed correctly. For example, Qwest has implemented customized training curricula so that SDCs receive initial and continuation training covering both general SDC processes and processes specific to various products and services. Qwest also has instituted quality reviews by SDC coaches, who examine orders processed by each SDC and provide each individual with feedback on improving performance, as needed. These coaches also perform trend analyses across all SDCs to determine whether errors that are made are common to all SDCs. If so, Qwest can issue a reminder Multi-Channel Communicator – the mechanism used to communicate system and process changes to the Qwest Service Centers – or, if needed, a new Job Aid. The existence of these training programs – and other support provided to CLECs by the ISC – contributed to KPMG’s closing of Observation 3086.<sup>3</sup> In fact, in the ROC OSS Test, KPMG found that “Qwest’s training, continuous improvement measures and new quality initiatives adequately address the identified issues.”<sup>4</sup>

In the first six months of 2003, Qwest delivered more than 160 instructor-led classes, and instructors delivered over 2500 hours of training.<sup>5</sup> Generally, Qwest students have received more than 38,000 hours of training in total during this period. In addition, 385 employees visited web-based training classes, and 16 courses were developed or updated during this period.

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<sup>3</sup> See KPMG Second Supplemental Response for Observation 3086, April 12, 2002, *also available at* [www.nrri.ohiostate.edu/oss/master/observations/april/o3086kpmg\\_second\\_resp.pdf](http://www.nrri.ohiostate.edu/oss/master/observations/april/o3086kpmg_second_resp.pdf).

<sup>4</sup> *ROC Final Report* at 146 (Test Criterion 12.8-2).

Although this training and guidance have proven to be useful tools in ensuring that SDCs manually process LSRs correctly, Qwest also has added enhanced edits in the Service order processor to prevent SDCs from making common errors when they convert an LSR that has dropped out for manual processing into a Service Order. This complements the training provided to the SDCs to minimize processing errors.

Although Qwest has implemented these measures, both individually and combined, to improve the accuracy of manual processing, the company recognized that a new PID may be useful for monitoring its performance. That is why, in response to KPMG's April 30, 2002, "Qwest Manual Order Entry Performance Indicator Description Adequacy Study," Qwest agreed to develop and present a proposal for a new performance measure addressing manual processing order accuracy.<sup>6</sup> This new PID, as discussed earlier, is PO-20.

Finally, it is worth noting that in the limited instances in which manual processing errors occur, CLECs currently have several resources to which they can turn. For instance, CLECs currently can use online status tools available through IMA to track their orders through to provisioning. Effective with IMA 10.1, which was implemented on August 17, 2002, IMA was enhanced to include a service order detail notice (PSON), which is provided following the FOC, at the CLEC's option.<sup>7</sup> CLECs also can contact the Help Desk for any LSR-related issue, which is optimal for issues specific to a single LSR; contact the Service Management Team assigned to them if they believe there is a pattern of problems in

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<sup>5</sup> Data for prior periods can be found in Qwest I and II Ex Parte 08/14/02a (Response to WCB on SDC training and July 18 Outage)[This and other documents referenced in this document were Exhibits to Qwest's Arizona FCC 271 Filing and can be made available on request].

<sup>6</sup> See Qwest's Response to KPMG's Manual Order Entry PID Adequacy Study of April 30, 2002; see also Qwest July 2 Errata.

connection with their LSRs; and, through the Change Management process, request system, product or process changes that would improve their interaction with Qwest.

Other system edits were implemented on August 17, 2002, as part of the IMA 10.1 release. These edits included a comparison of the Purchase Order Number (“PON”) populated on the service order(s) listed on the FOC to the PON on the LSRs that the Qwest service order representative processes to minimize the occurrence of mismatches.<sup>8</sup> Qwest continues to explore and implement system enhancements that eliminate the opportunity for human error.

In short, Qwest has – and continues to – put multiple measures in place to reduce the number of manually processed orders and potential for human error. Qwest has begun measuring service order accuracy under a new PID to assist in tracking and reducing manual processing errors; the same measure is being refined through the collaborative efforts of CLECs, State staffs and Qwest in the Long Term PID Administration forum; and Qwest will be subject to escalating penalties in the event it is unable to meet the PID’s new 95% benchmark. Finally, a number of options are available to CLECs to assist them if an error occurs during the manual handling of an order.

### **Conclusion**

Qwest has agreed to take measures to prevent retail sales representatives from accessing or modifying wholesale orders. Qwest has taken and continues to take significant steps to improve manual processing of orders. Existing data shows that Qwest currently

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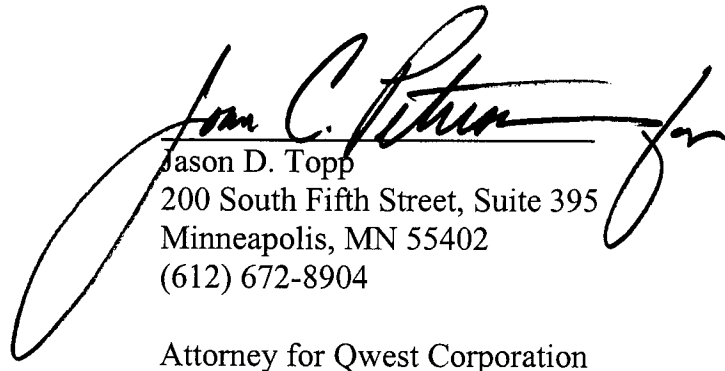
<sup>7</sup> As of January 31, 2003, 13 CLECs have signed up to receive this new notice.

<sup>8</sup> The August 17 edit applies only to initial LSRs because the PON must remain the same on any supplemental LSR.

handles such orders well. To ensure continued performance, Qwest is in the process of updating its PID measurements to evaluate the quality of its performance and faces consequences if it does not perform at an adequate level. This commission should be assured that Qwest has taken appropriate steps to address the issues raised by Eschelon in this proceeding and the commission will be able to determine for itself whether those actions are successful. No further action by this commission is necessary in this docket. Qwest urges the Commission to accept its compliance filings of December 15 and today and close this docket.

Dated this 13<sup>th</sup> day of February, 2004.

**QWEST CORPORATION**



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