

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation Into) DOCKET NO. UT-970300
)
U S WEST COMMUNICATIONS, INC.'S) SUPPLEMENTAL INTERPRETIVE
) AND POLICY STATEMENT ON
Compliance with Section 271 of the) PROCESS AND EVIDENTIARY
Telecommunications Act of 1996.) REQUIREMENTS
.....)
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Introduction

This Interpretive and Policy Statement supplements the Commission’s October 29, 1997 Interpretive and Policy Statement. That document was issued to govern the process by which the Commission will prepare its recommendation to the Federal Communications Commission (FCC) regarding an application by U S WEST Communications, Inc. (USWC or U S WEST) under Section 271 of the Telecommunications Act of 1996 to provide regional interLATA toll service. The 1997 Statement included a proceeding schedule that called for U S WEST to file with the Commission a copy of the company’s complete application to the FCC, 90 days before US WEST actually files the application with the FCC.

U S WEST Proposal for Modified Process.

U S WEST on January 18, 2000, filed a proposal to modify the Interpretive and Policy Statement by substituting a series of nine workshops of 1-3 days each starting in March, 2000 and ending in October, 2000 for the 90-day adjudicative process. It later amended its recommendation to provide for a series of three, five-day workshops to replace the adjudicative process.

The Commission invited and received comments from interested persons and convened a workshop on February 18, 2000, on issues relating to US West’s request to modify the procedure for Commission evaluation of its potential Section 271 filing.

Evidentiary Requirements.

Participants met following issuance of the first interpretive and policy statement to review and develop a statement of evidentiary requirements, consistent with Commission instructions. Commission Staff served a draft document, which reflected a consensus of the participants, and other interested persons commented. We adopt the Commission Staff’s consensus draft, with a few changes reflecting additional input from written comments and grammatical, technical, and minor changes.

Commission action.

Following discussion at its March 10, 2000, open meeting the Commission adopted the process

and the evidentiary requirements outlined in this Supplemental Interpretive and Policy Statement. This Supplemental Interpretive and Policy Statement accepts the concept of workshops, adding four workshops to the prior process. It would also require the filing of a preliminary document - not a full application - that would set forth an outline of the Company's application to the FCC and list in detail all the documents that U S WEST intends to file in support of its application. Finding the USWC-proposed schedule unrealistic, the Commission adopted a model workshop schedule, subject to revision as a result of prehearing conferences, allowing sufficient time for discovery. The amended process also retains the adjudicative process set out in the earlier policy statement, with the proviso that the process will be shortened and that neither the fourth workshop nor the concluding adjudication will be held if all matters have been otherwise resolved.

Supplemental Statement of Policy

The Commission adopts the following supplement to its Interpretive and Policy Statement of October 29, 1997:

- **The Commission adopts a workshop process** as a precursor to the formal process previously defined in the 1999 policy statement. It will schedule a series of four workshops, with the fourth scheduled only if needed to assure that commitments have been met, that prior standards have not been dropped, or to address unresolved matters.
- **The Commission retains the 14-item list** of matters to be clarified in U S WEST's 271 filing set forth in the Interpretive and Policy Statement, including the Commission's decision that the SGAT¹ not be available to U S WEST in Washington to support a "Track B" application. The existing interconnection agreements between US WEST and its competitors will form the basis for US WEST's legal obligations concerning terms and conditions of service. The Commission will consider an SGAT or similar mechanism if the consideration is limited to elements or services that are not provided for in an interconnection agreement.
- **The process will be considered adjudicative in nature.** While the Commission's consideration of U S WEST's 271 application is not required to be an adjudicative proceeding under the Administrative Procedure Act (APA), it will be considered adjudicative consistent with RCW 34.05.413. This will allow testimony under oath and reliance on the record that is generated. The workshops are parts of the adjudicative process and should be seen as adjudicative in nature.
- **Workshop Format.** An ALJ will preside at the workshops to keep the process focused and fair. Similar to a hearing, with testimony under oath, the workshops will allow more

¹"SGAT" is a Statement of Generally Available Terms, provided by law for use in states if no competitive local exchange companies sought to provide service within the state.

latitude and flexibility in questioning. The Commission expects that Commission Staff will facilitate the development of pertinent information. Following each workshop, Staff will circulate a draft summary recommendation to the FCC stating the agreements and remaining disagreements of the parties on the topics of the workshop, and the parties will present a summary of their evidence to the Commission and respond to Commissioner questions.

- ***Ex parte* contact** with Commissioners will be prohibited.
- **U S WEST must file a preliminary document** -- not a full application -- that sets forth an outline of its expected application and a list of all the documents that it intends to file in support of its application, when it files materials for the first workshop. U S WEST must file its complete case on the workshop-specific issues for the remaining workshops according to the schedule to be determined, in advance of each workshop.
- **Time is needed.** At least 60 days is needed between US WEST's evidentiary filing and answering testimony. The time is needed to allow both discovery and an adequate time for review of its data and for parties' preparation. The schedule will allow at least 10 business days between the close of discovery and the workshop.
- **Additional Workshop, If Required.** In addition to the three workshops proposed by U S WEST, a fourth workshop is added -- for use only if needed -- to address unresolved issues, and any issues not raised in the other three workshops.
- **U S WEST's actual 271 Application** to the FCC must be filed in Washington State before U S WEST files it with the FCC.
- **Evidentiary requirements.** The Commission adopts for the purposes of this proceeding the evidentiary requirements attached to this Statement as Appendices A and B.
- **Workshop Schedule.** The Commission adopts the tentative or model workshop schedule set out in Appendix C, and retains the concluding adjudicative process set out in the earlier policy statement. Actual dates will be established in prehearing conferences. If the issues are largely resolved in three workshops, the fourth workshop may be eliminated and the concluding adjudicative process may be considerably shorter than 90 days or might not be needed at all.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Adopted by Commission Order
Dated March 15, 2000 In this Docket

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Signature block, if needed.

Appendix A

Information Required from U S WEST

I. Instructions for U S WEST

This appendix is organized in a format which follows section 271 (c) and (d) of the Act. In providing answers to questions posed in this appendix, U S WEST should conform to the following:

1. Pursuant to the Commission's Order on Investigation and the original and supplementary Interpretive and Policy Statements in Docket UT-970300, US WEST is required to file with the WUTC all+ information the Company will file with the FCC. Where the answer to a question is addressed within the Company's materials that will be filed with the FCC, the Company must provide an index reference that will enable users to easily locate answers within those documents. It is not necessary for the Company to provide the Commission with duplicative information that is already contained within the materials USWC intends to file at the FCC.
2. The filing should include a table of contents and contain an index that will enable users to easily locate answers in the documents filed. Both the index and the table of contents should be keyed to the structure of this Appendix. Where the answer is contained within the materials to be filed with the FCC, the index should reference the FCC materials. Where the answer is not contained within the materials to be filed with the FCC, the filing should include tabs for any attachments.
3. Answers should focus on quantitatively-based explanations, with accompanying general explanations. Discussions of data sources and techniques should be contained within the attachments or referenced to the materials to be filed at the FCC. Unless otherwise specified in the questions, answers should be interpreted as pertaining to the state of Washington.
4. All evidence and data should demonstrate *present* compliance, not promises of future compliance.
5. Please note that the generic questions in section V(A) are applicable to all checklist items.

II. State of Local Competition, Pursuant to Section III(A), Par. 34 of the Ameritech/ Michigan Order

The intent of this section is to gather and submit information to the FCC. For "State of Local Competition" questions, it should be noted that this Commission's consultative role with the FCC is not the appropriate forum to resolve disputes or complaints concerning previous decisions or on-going proceedings.

To the best of U S WEST's knowledge, answer the following concerning the state of local competition in Washington:

1. On a statewide and exchange basis, state separately the number of active business and residential access lines with local exchange service provided by U S WEST.
2. On a statewide basis, state separately the number of business and residential customer accounts with local exchange service provided by U S WEST?.
3. In terms of both lines and customer counts, by residential and business customers, what proportion of the local exchange market does U S WEST serve in its service territory?
4. What revenues did U S WEST derive from Washington in 1996 and 1997 from: 1) basic local residential services; 2) basic local business services; 3) intraLATA toll; 4) access charges; and 5) all other types of services?
5. What is the total number and identity of competitive local exchange carriers (CLECs) certified to provide service in U S WEST's service territory? Specify if CLECs are facilities-based, resellers, purchase Unbundled Network Elements (UNE's) or some combination. Which of these CLECs are actually providing service?
6. What is U S WEST's opinion concerning the likely success or growth rate of CLECs in the local exchange market?
7. What is the number, type, and geographic location of customers in U S WEST's service territory served by competing providers?
8. Provide any reports, studies or analyses available, and created within the past two years preceding the application, that contain data on market shares of U S WEST and local competitors, or that evaluate the likely entry, success or rate of growth of competitors or potential competitors.
9. Provide a description and current status of all complaints made to U S WEST, to the WUTC, to the FCC, or to other governmental authorities by other carriers, competitors,

or other entities that have requested interconnection, unbundled network elements or the ability to resell U S WEST services. Include, list and describe the status of all suits or actions at law, other litigation, or administrative proceedings of any type, involving U S WEST's policies and practices in Washington state regarding interconnection, unbundled network elements, or resale.

III. Section 271(c)(1)(A) - Presence of a Facilities-Based Competitor

Section 271(c)(1) of the Act requires the presence of a facilities-based competitor. To determine whether or not U S WEST meets this requirement, answer the following:

1. List the carriers registered by the WUTC as facilities-based CLECs to operate in U S WEST's service territory.
2. Which of the carriers listed above are currently providing service to local customers through: i) using exclusively their own facilities or, ii) a combination of U S WEST's and the competing carrier's facilities, with the latter predominating? Describe how service is being provided (e.g., U S WEST's unbundled loops connected to the CLEC's switch, etc.).
3. To what extent is each CLEC above providing: i) business exchange service; ii) residential exchange service, or; iii) exchange and/ or special access services? State the number of customers actually receiving service in each category and their geographic location.
4. For each of the services described above, indicate whether the services are provided via: i) resale; ii) UNEs; or iii) entirely over facilities owned by the CLEC. Indicate whether the service is provided either exclusively or predominantly over CLEC facilities.
5. How many loops (business and residential), by type (i.e., DSO, DS1), do CLECs lease from U S WEST, both throughout U S WEST's service territory and on an exchange basis?
6. How many line-side switch ports and unbundled local switching elements do CLECs lease from U S WEST, both throughout U S WEST's service territory and on an exchange basis?
7. On a statewide and exchange basis, how many U S WEST loops (business and residential), by size (i.e., DS0, DS1), are connected to a switch owned or controlled by CLECs?
8. On a statewide and exchange basis, how many loops (business and residential), by size (i.e., DS0, DS1), owned or leased by CLECs, are connected to U S WEST switches?
9. List each Central Office (CO) where U S WEST has implemented physical collocation,

and indicate the number of collocators in each CO. Give the same information for virtual collocation. If U S WEST has implemented any other collocation options, specify type and CO location.

10. What is the average time for U S WEST to implement physical or virtual collocation? What installation schedule is used?
11. What are U S WEST's collocation rates? How do rates for physical collocation differ from those for virtual collocation?
12. What process does U S WEST use to determine if space is available for physical collocation? State whether U S WEST has denied collocation to any CLEC and, if so, explain the grounds for such denial and indicate the Central Office(s) in which collocation was denied.
13. Provide monthly traffic volumes separated by local and intraLATA toll traffic terminated to all CLECs in the aggregate during the most current three months.

IV. Section 271(c)(2)(A) - Interconnection Agreements

To determine whether or not U S WEST meets the requirements of Section 271's "Track A", the Commission requests the following information. Information provided in this section should be provided on a Washington state basis.

1. How many interconnection agreements has U S WEST negotiated or had arbitrated with CLECs pursuant to sections 251 and 252 of the Act? List the companies and the effective date of each agreement, and whether or not the agreement was negotiated or arbitrated. Provide copies of the agreements.
2. For all of the arbitrated agreements in #1 above, indicate whether U S WEST has appealed the Commission's decision to Federal District Court. Explain the issues in the appeal and its status.
3. Which CLECs have requested negotiations with U S WEST pursuant to sections 251 and 252, but have not yet entered into interconnection agreements with the company? What is the status of negotiations and/ or arbitrations that have not yet resulted in an approved agreement? What are the unresolved issues in each of those negotiations and arbitrations?
4. How many interconnection agreements has U S WEST negotiated with CLECs pursuant to state WUTC rules which have not been superseded by section 251/ 252 agreements? List the companies and give the effective date of each agreement.
5. What services are CLECs currently purchasing under their interconnection agreements?

Show in tabular format, by carrier.

6. Which of U S WEST's interconnection agreements contain implementation schedules? (Indicate percentage of total.) What degree of detail do the implementation schedules contain? Provide implementation schedule details for the five largest (number of access lines served) CLECs.
7. For those interconnection agreements with implementation schedules, has U S WEST met the commitments specified? Have CLECs met their commitments? Give specific citations to the interconnection agreement and explain which party was responsible for not meeting each commitment.
8. Does U S WEST believe that any of the CLECs, with whom agreements could qualify U S WEST under Track A, negotiated in bad faith? If so, describe.
9. For those interconnection agreements with implementation schedules, does U S WEST believe that any of its competitors are engaging in strategic manipulation of local market entry - or have intentionally delayed implementation of their interconnection agreements - in order to prevent U S WEST from entering the in-region, interLATA market? If so, state the basis for such belief.
10. For each interconnection agreement with a CLEC currently providing service, provide traffic data for all traffic terminated to that CLEC on both a resale and facilities basis. For traffic terminated on a facilities basis distinguish between local and intraLATA toll traffic. All reports should include the three most current months.

V. Section 271(c)(2)(B) - Competitive Checklist

For each section 271 checklist item, U S WEST should provide relevant, detailed information in response to the generic questions below, as well as to the specific questions for each item.

A. Checklist Items: Generic Questions

For each individual checklist item, answer the following with quantitative information, and in tabular format where possible:

1. Describe how U S WEST has fully implemented this checklist item as required by section 271 of the Act.
2. What performance standards must U S WEST meet regarding the quality, reliability, and timeliness of providing checklist items to CLEC's, affiliates, and itself? How were these performance standards determined?

3. To whom is U S WEST presently providing, on a commercial basis, this checklist item?
4. Describe how the quality and reliability of checklist items provided to competitors by U S WEST are comparable to the quality and reliability of such items U S WEST provides to itself or its own customers.
5. What technical standards and/or business rules is U S WEST providing to CLECs for each checklist item? Explain the process and scheduling for updating these technical standards and/or business rules.
6. What is the rate of each checklist item? How was the pricing of each item (as applicable) determined? Is pricing equitable?
7. If U S WEST is not currently providing this checklist item, is U S WEST offering the item? If so, how is it offering the item and under what terms, conditions, and rates? Describe how the checklist item is readily available and easily obtained by competitors.
8. If U S WEST is not currently offering this checklist item, is U S WEST capable of commercially providing it? What is U S WEST's anticipated schedule to provide the item? Has any CLEC requested the checklist item?
9. Has U S WEST received any formal or informal written complaints from new entrants regarding provision of this checklist item? If so, what was the nature of the complaint, what is its current status and, if applicable, how was it resolved? For complaints that were found to be valid, what steps did U S WEST take to avoid recurrences?
10. Is U S WEST able to provide this checklist item in all parts of its Washington state service territory? If not, describe in which parts of its territory the service cannot be provided, and why.

B. Checklist Item One: Interconnection, Section 271 (c)(2)(B)(i)

1. How is U S WEST offering interconnection in accordance with the requirements of sections 251 (c)(2) and 252(d)(1) of the Act?
2. On what dates did any nonaffiliated carriers actually interconnect with U S WEST?
3. At what points within its network does U S WEST provide or offer interconnection?
4. What is the price for interconnection, including all recurring and nonrecurring charges, and is it based on cost as required by section 252(d)(1)?
5. Does U S WEST impose material limitations on interconnection (i.e., one-way trunking,

use of different trunk groups for different "types" of traffic, etc.)?

6. Provide comparative performance data for the twelve most current months on the time required to repair outages for U S WEST's lines versus the CLECs' lines.
7. Provide comparative performance data for the twelve most current months on call completion rates for originating and terminating calls across carriers.

C. Checklist Item Two: Nondiscriminatory Access to Network Elements, Section 271 (c)(2)(B)(ii)

1. How is U S WEST providing nondiscriminatory access to unbundled network elements at just and reasonable rates and in accordance with the requirements of sections 251 (c)(3) and 252(d)(1) of the Act?
2. List each CLEC to which U S WEST is selling network elements, the network elements provided, the volume of each network element provided, and the date the element was first provided.
3. At current network capacity, what additional volume of each network element can U S WEST provide to CLECs?
4. Are there any network elements required by this Commission or the FCC that U S WEST does not plan to offer? Please list them and explain why US West does not plan to offer them.
5. For each element U S WEST does not plan to unbundle, has U S WEST demonstrated technical infeasibility and offered any alternative? For each such element, please describe why they are technically infeasible and what alternatives have been offered.
6. What methods can entrants use for physical access to UNEs?
7. Is U S WEST providing access to UNEs in a manner that allows requesting carriers to combine them? Describe the methods for these UNE combinations. Additionally, list all restrictions U S WEST imposes on CLEC requests for combinations of UNEs. List the length of time needed for new entrants to obtain and combine network elements, e.g. time required to build collocation cages; loop cutover times, etc.
8. Are there any UNE elements that U S WEST will offer only in combination (unseparated)? If so, what are they, and why?
9. Does U S WEST intend to take the position that CLECs must obtain separate licenses from vendors when obtaining and using unbundled network elements from U S WEST?

D. Checklist Item Three: Nondiscriminatory Access to Poles, Ducts, Conduits, and Rights-of-Way, Section 271 (c)(2)(B)(iii)

1. How is U S WEST providing nondiscriminatory access to poles, ducts, conduits and rights-of-way at just and reasonable rates?
2. Does U S WEST provide the same access to these facilities to CLECs as it provides itself? Describe how it does so.
3. Does U S WEST make available to CLECs its maps, plats, and other relevant data, and what are the terms and conditions of such availability? Describe how it does so.
4. Describe any municipal (or other type of government) franchise, grant, or additional requirement that affects U S WEST's access to pathways, poles, conduits, and rights-of-way differently from that of unaffiliated carriers.
5. What is U S WEST's policy for reservation of space for its own use? How does this affect access to rights-of-way of competitors?
6. How many competitors gain access to customer dwellings in multidwelling units, including access to interbuilding cabling?

E. Checklist Item Four: Unbundled Local Loop Transmission, Section 271 (c)(2)(B)(iv)

1. How is U S WEST offering local loop transmission from the central office to the customers' premises unbundled from switching and other services offered by the incumbent carrier?
2. How many such loops is U S WEST providing each CLEC?

F. Checklist Item Five: Local Transport, Section 271 (c)(2)(B)(v)

1. How is U S WEST providing local transport from the trunk side of its or a competing carrier's local exchange carrier switch unbundled from other switching or services offered by the incumbent carrier?

G. Checklist Item Six: Local Switching, Section 271 (c)(2)(B)(vi)

1. How is U S WEST offering local switching unbundled from transport, local loop transmission, or other services?

H. Checklist Item Seven: 911 and Other Services, Section 271 (c)(2)(B)(vii)

1. How is U S WEST providing nondiscriminatory access to 911 and E911 services? Directory assistance services? Operator call completion services?
2. How is U S WEST trying to resolve any problems it has experienced in integrating CLEC customer information into the 911 system? Discuss what problems, if any, are caused by CLEC error.
3. Please provide data showing the percentage of errors found in CLEC end user information and U S WEST end user information, respectively, and the frequency of updates to the database for CLEC end user information and U S WEST end user information, respectively.

I. Checklist Item Eight: White Pages, Section 271 (c)(2)(B)(viii)

1. How is U S WEST providing white page directory listings for customers of the CLEC's telephone exchange service?
2. Under what terms does U S WEST provide white page directory listings?
3. Under what terms does U S WEST provide nondiscriminatory access to basic directory listings for business accounts (name, address, telephone number, and primary business classification)?
4. Under what terms does U S WEST provide: (1) complete content of white page local exchange directory in electronic format; (ii) specific white page directory publication schedules and deadlines; and (iii) specific white page directory publication schedules and delivery dates/ locations?
5. Under what terms does U S WEST deliver white and yellow page directories to customers of new carriers? How do those terms differ from those U S WEST affords itself, its affiliates, or its retail customers? How do they differ from the requirements contained in WAC 480-120-042?

J. Checklist Item Nine: Nondiscriminatory Access to Telephone Numbers, Section 271 (c)(2)(B)(ix)

1. How is U S WEST providing nondiscriminatory access to telephone numbers for assignment to other carriers' telephone exchange service customers?
2. Under what terms do carriers, including U S WEST and its affiliates, obtain access to telephone numbers for assignment?

3. How is U S WEST managing limitations in numbering resources (e.g., NXX freezes)?

K. Checklist Item Ten: Databases and Signaling, Section 271 (c)(2)(B)(x)

1. How is U S WEST providing nondiscriminatory access to databases and associated signaling necessary for call routing and completion?
2. To which CLECs is U S WEST providing such access, and under what terms, conditions, and rates?
3. Are there any databases that competitors have requested access to that U S WEST is unwilling or unable to supply? Identify the databases and state why U S WEST is unable or unwilling to supply access. Identify the competitors involved.
4. Are there any pending requests for access to databases that U S WEST has not granted or completed? Identify the nature of the request, the competitor involved and the reason(s) why the request has not been granted or completed.

L. Checklist Item 11: Number Portability, Section 271 (c)(2)(B)(xi)

1. What methods of interim number portability is U S WEST providing? Specify if it is being offered under tariff or under the terms of specific interconnection agreements
2. To which CLECs is U S WEST providing interim number portability, and under what terms, conditions, and rates?
3. Has U S WEST denied interim number portability arrangements requested by any CLECs? If so, describe the circumstances in detail.
4. What has been U S WEST's operational experience in providing each type of interim local number portability?
5. What are the characteristics of each interim local number portability arrangement, including cost recovery and service quality implications?
6. Is U S WEST going to meet the FCC-mandated implementation schedule for permanent local number portability? If not, why not?
7. If U S WEST does not meet the FCC-mandated implementation schedule for permanent local number portability, how will this affect its ability to provide services to CLECs?

M. Checklist Item 12: Dialing Parity, Section 271 (c)(2)(B)(xii)

1. How is U S WEST providing nondiscriminatory access to such services or information, as is necessary, to allow a requesting carrier to implement dialing parity in accordance with the requirements of section 251 (b)(3)?
2. What percentage of U S WEST switches are providing dialing parity to competitors for local calls?
3. What percentage of U S WEST switches, serving what percentage of access lines, have been equipped to provide dialing parity for intraLATA toll calls, and in what percentages of switches, serving what percentage of access lines, has that capability been tested?
4. Will intraLATA toll dialing parity be implemented in such switches using the "full 2-PIC" subscription method, and if not, what method will be used?
5. Does U S WEST plan to provide dialing parity for intraLATA toll calls before, or only coincident with, its provision of in-region interLATA services? Why or why not?
6. After receiving section 271 authorization, when a customer calls U S WEST to establish new local exchange service or to switch the location of its existing service, how does U S WEST plan to have its service representatives inform the customer of their long distance provider options in the manner prescribed in Ameritech/ Michigan and Bell South/ South Carolina Orders (i.e., offering to list the optional providers, using a random order)? Please provide scripts to be used by service representatives to inform customers of their provider options.

N. Checklist Item 13: Reciprocal Compensation Arrangements, Section 271 (c)(2)(B)(xiii)

1. How is U S WEST providing reciprocal compensation arrangements in accordance with the requirements of section 252(d)(2)?
2. Describe arrangements for reciprocal compensation, including bill-and-keep, for local exchange traffic between U S WEST and CLECs and other ILECs?
3. For carriers with bill-and-keep arrangements, specify whether bill-and-keep is replaced with explicit compensation arrangements when traffic is not in balance. How is traffic balance determined?
4. For all carriers with explicit compensation arrangements, specify the type of arrangements and rates (i.e., call termination rates).

O. Checklist Item 14: Resale, Section 271 (c)(2)(B)(xiv)

1. How is U S WEST providing telecommunications resale services in accordance with the

requirements of sections 251(c)(4) and 252(d)(3)?

2. What services are offered for resale to CLECs? What services are not?
3. What is the level of wholesale discount for each service offered for resale?
4. Which vertical features are offered for resale to CLECs? Which are not?
5. What nonrecurring charges, if any, does U S WEST impose on resellers?
6. Does U S WEST impose changeover charges? If so, under what circumstances?
7. What has been U S WEST's operational experience (other than order processing) in providing each service for resale?
8. Will U S WEST brand resold operator call completion and directory assistance services at the reseller's request, or are those services offered on an unbranded basis only? What limitations does U S WEST impose on branding?
9. Does U S WEST provide all operator functions (i.e., operator billing options, rate quotes) on resold operator call completion services?
10. Does U S WEST route, at a reseller's request, operator and directory assistance calls to the reseller's own facilities?
11. Have all retail services (including Centrex and other central-office based switching services) offered by U S WEST after January 1, 1996, been made available for resale? If not, describe any restrictions, including the "grandfathering" of such services.
12. Per discussions in the Bell South/ South Carolina Order, is U S WEST offering Contract Service Arrangements (CSAs) at discount rates? With CSAs, does U S WEST use cancellation penalties? What written complaints, if any, has U S WEST received about CSAs? What resolution has been reached, if any, for CSA complaints?

VI. OSS Parity

To the extent that quantitative data is provided, U S WEST should explain all calculations and the data time period.

A. General OSS Questions

1. What operational support systems (OSS) does U S WEST provide to CLECs?

2. What forms of OSS access are available to CLECs for: i) the purchase of unbundled network elements, ii) the resale of U S WEST retail services, and iii) maintenance and repair?
3. What testing does U S WEST perform on new OSS systems it provides in order to demonstrate that information will be delivered to new entrants in a timely, accurate, and useful manner?
4. Is OSS access provided to Washington CLECs pursuant to uniform interfaces intended for nationwide or region-wide implementation?
5. What is the current capacity for each of U S WEST's OSS systems (i.e., number and type of transactions that can be processed within specific time frames, the number of competitors that can be supported, etc.)? What are U S WEST's plans to expand such capacity? Does U S WEST believe this capacity is sufficient to meet CLECs' needs? Please provide any test results that support U S WEST's representations of the capacity of its OSS systems.
6. What steps has U S WEST taken to ensure nondiscriminatory access to OSS for each checklist item?
7. What training has U S WEST provided for each available ordering interface to its own employees? Describe the procedures used for training new U S WEST service representatives on CLEC interface systems. Describe the procedures used for training new U S WEST Service representatives on U S WEST internal OSS systems. What proportion of training time do new representatives spend learning about U S WEST internal OSS systems versus CLEC OSS interfaces?
8. What training has U S WEST (or its subcontractors) provided to CLEC employees on its OSS interfaces? How much are CLECs charged for the training provided?
9. How does the timing for meeting competitor's demands for service compare with the timing under which U S WEST provides such items to itself or its own retail customers?
10. What is the personnel turnover rate at U S WEST's Local Service Center (LSC, specifically for order processors, account representatives, and customer support managers? How long does it take to train each of these types of LSC personnel? At the LSC, is there a mixing of personnel between retail/wholesale operations?
11. Does U S WEST provide integration between U S WEST's interfaces for preordering and ordering functions so that manual re-entering does not have to occur?
12. When completing pre-ordering inquiries and orders, is the information and interface type provided to competitors analogous to what U S WEST provides itself?

13. In the past, how have OSS interface specifications been made available to potential competitors? What system design and general information is U S WEST providing to CLECs about future modifications or design changes which will be necessary for interfacing with upgraded U S WEST legacy and access systems?
14. Are there any functional issues within the interfaces provided by U S WEST that result in more steps or additional time spent by CLECs? (Examples: having to scroll through long lists; ability to utilize "inquiry modes" to validate data before submitting orders, etc.)
15. What is U S WEST's experience with "operational readiness" problems (for example, software system "lock ups" or shut downs)? What are the problems, and how often do they occur?

B. Pre-Ordering

1. Does U S WEST provide equivalent access to due dates (the date on which the order is scheduled to be completed) for service installation? Is the method of calculating due dates equivalent to the method U S WEST uses for its retail operations?
2. Does U S WEST provide equivalent access to telephone numbers? Does U S WEST limit the quantity of telephone numbers that a CLEC can reserve in a central office for either an individual customer or on the aggregate basis of all reservations made by a CLEC? Is there an equivalent restriction that applies to U S WEST's retail operations?
3. For pre-ordering information do CLECs have access that is equivalent to that of U S WEST's retail representatives?

C. Ordering/ Provisioning

1. How and when does U S WEST provide a new entrant information concerning the status of the new entrant's resale or UNE order?
2. Describe order rejection rates for retail, resale, and UNE orders. For resale and UNEs break down the rates by the type of interface used - both electronic and manual, as well as different software types.
3. For both retail and resale, compare rejection rates for POTS services.
4. How does U S WEST notify a CLEC that an order has been rejected? How long does it take for an order rejection notice to be issued?
5. Provide statistics for loss of dial tone for customers leaving U S WEST and returning to

U S WEST, separated on a resale and facilities basis. List the number of customers affected by loss of dial tone and for each separate category provide the average number of minutes of dial tone loss.

6. Delineate order rejections by cause (U S WEST error versus CLEC error). If U S WEST states the error rate is the result of user error, provide adequate support for this contention.
7. What information does U S WEST provide to CLECs concerning its internal editing and data formatting requirements? Is this information adequate for successful processing of CLECs' orders through both U S WEST's interface and its internal systems?
8. In what manner does U S WEST provide order status notices to CLECs? Are equivalent notices used by U S WEST internally on its own orders? How are those notices provided? Demonstrate that the notices are offered at parity for CLECs and U S WEST's own internal usage.
9. Does U S WEST provide CLECs with error notices and are those notices used by U S WEST when it provisions a retail service? If the notices differ, how do they differ? Are notices provided by U S WEST in the same manner as the order was received (e.g., electronic, fax, phone call)? In what time frame are the notices provided to CLECs and internally to U S WEST?
10. How long does it take U S WEST to provide firm order confirmation notices (FOCs)? Identify the retail analogue of FOCs and report separately for manual and electronic responses. Does the response time meet U S WEST's contractual obligations contained in all interconnection agreements?
11. Does U S WEST provide order jeopardy notices? Does it provide notices for both problems caused by the CLECs or their customers, and those that are caused by U S WEST itself? When are jeopardy notices provided? What percentage of the notices have been issued before the original due date requested in the order and what percentage after that date? Does U S WEST use jeopardy notices in provisioning its own retail services? Provide equivalent information on timeliness of notice issuance.
12. Provide data showing average installation intervals for both resale and retail. The parity measurement used should be the time frame from when U S WEST first receives an order to when service is installed.
13. How is U S WEST providing nondiscriminatory access to OSS functions so that CLECs are enabled to submit orders for unbundled network elements in a timely manner? Where possible U S WEST should include preordering, order, and installation comparisons to retail analogues. Responses should include time comparisons for various OSS functions.

14. For UNEs, what problems have CLECs experienced with high rejection rates and untimely order status notices?
15. What is the level of manual processing involved in the ordering and provisioning of UNEs?

D. Repair, Maintenance, and Billing

1. What type of recording and other data does U S WEST provide that allows carriers to properly bill end users, interconnecting local carriers, and toll carriers?
2. Provide comparisons between U S WEST's retail services and resold services for each of the following:
 - a. How are trouble tickets entered into U S WEST's maintenance system?
 - b. What is the average time for a trouble ticket to clear for basic POTS, Centrex and PBX trunks? Time calculations should commence with when the trouble ticket was received by U S WEST.
 - c. For trouble tickets not requiring dispatch, how are trouble reports cleared and appropriate service representatives notified?
 - d. For trouble tickets requiring dispatch, what is the standard interval for repair completion for each of the service groups listed in (b)? What percentage of repair dispatches meet those standard intervals?
3. What is U S WEST's procedure for handling CLEC billing disputes? Who bears the burden of proving that charges are accurate?

VII. Provision of Separate Affiliate Operations Pursuant to Section 272(d)(3)(B)

For any U S WEST affiliate designated to provide in-region interLATA service, provide answers to the following with evidence to support all assertions of compliance with section 272.

1. Does the affiliate operate independently from U S WEST?
2. Does the affiliate maintain separate books, accounts, and records as prescribed by this Commission and section 272?
3. Does the affiliate employ separate officers, directors, and employees from U S WEST?
4. Has the affiliate obtained credit under any arrangement that would permit a creditor, upon the affiliate's default, to have recourse of U S WEST assets?
5. Does the affiliate conduct transactions with U S WEST on an arms-length basis, with any transactions being reduced to writing and available for public inspection?

6. How will U S WEST and its affiliates comply with the audit requirements of section 272(d)?
7. How will U S WEST provide services on a non-discriminatory basis, in order to meet the requirements of section 272(e)?
8. How will U S WEST and its affiliates comply with the joint marketing provisions of section 272(g)?

VIII. Public Interest Pursuant to Section 271(d)(3)(C)

Please provide the evidence U S WEST intends to rely upon to establish that its section 271 application for interLATA relief is in the public interest, convenience, and necessity. At a minimum, address the following questions and points:

1. The potential benefits to the public interest and to consumers specifically that U S WEST foresees from its entry into the long distance market.
2. The present state of competition in the provision of both local and long distance services.
3. The likely development of further competition in local and long distance markets if U S WEST does not enter the long distance market.
4. The likely competitive impact on the local and long distance markets if U S WEST enters the long distance market.
5. A description of the factors that should be considered in assessing whether U S WEST's entry into the long distance market would be in the public interest.
6. Whether the public interest requires the presence of viable local competition in at least the major markets in Washington. Whether such competition should be available to both business and residential customers. If viable competition is not required, whether, as an alternative, any other level or standard or test of competition must be met in order to establish that the application is in the public interest.
7. Whether integrative efficiencies, to producers or consumers, are likely to result from U S WEST's ability to offer both long distance and local service.
8. In what ways, if any, U S WEST's long distance entry or absence is likely to affect the ability of other firms to achieve such efficiencies.
9. How U S WEST anticipates it will provide its long distance services (e.g., using its existing network, building additional network facilities, reselling other carriers' service, or acquiring an existing long distance carrier). To what extent is this choice relevant to an assessment of

the risks and potential benefits of long distance entry?

10. What risk exists that U S WEST's market power in local markets could be used to hamper competition in the provision of any telecommunications service, including both local and long distance services?
11. Will U S WEST's ability or incentive to hamper competition be affected by its entry into long distance?
12. Will the entry of U S WEST into the interLATA market affect the incentives of long distance companies to expand into local service?
13. Will there be a "first mover" advantage associated with the ability to offer integrated service, and if so, how significant will that advantage be?

(END OF APPENDIX A)

Appendix B

Information Required from Competitive Local Exchange Carriers Registered to Provide Local Exchange Service in U S WEST's Service Territory

I. Instructions for Competitive Local Exchange Carriers

This appendix is organized in a format which follows Section 271 (c) and (d). In providing answers to questions posed in this appendix, the Competitive Local Carrier (CLEC) should conform to the following:

1. Answers should focus on quantitatively-based explanations, with accompanying general explanations. Discussions of data sources and techniques should be contained within the attachments.
2. Answers should be in a tabular format whenever possible.

II. State of Local Competition, Pursuant to Section III(A) of the Ameritech/ Michigan Order

The intent of this section is to gather and submit information to the FCC. For "State of Local Competition" questions, it should be noted that this Commission's consultative role with the FCC is not the appropriate forum to resolve disputes or complaints concerning previous decisions or on-going proceedings. To assist the Commission in determining the state of local competition in Washington, each CLEC should answer the following:

For questions 1 through 3, provide information separately for customers on a resale and facilities basis ("facilities basis" includes provision through unbundled network elements or wholly over your own facilities).

1. On a statewide and exchange basis, what is the number of active business and residential access lines served by your company within U S WEST's service territory?
2. On a statewide basis, what is the number of business and residential customer accounts served by your company within U S WEST's service territory?
3. On both an access line and customer account basis, what is your company's current and projected share of the local exchange market in U S WEST's service territory?

4. What revenues did you derive from Washington in 1996 and 1997 from: i) basic local residential services, ii) basic local business services, iii) intraLATA toll, iv) access charges, and v) all other types of services?
5. What is your opinion concerning your likely success or rate of growth in the local exchange market?
6. Provide any reports, studies or analyses available, and created within the past two years preceding the application, that contain data on market shares of U S WEST and local competitors, or that evaluate the likely entry, success or rate of growth of competitors or potential competitors.
7. Provide a description and current status of all complaints made to U S WEST, to the WUTC, to the FCC, or to other governmental authorities by your company arising from your company's request for interconnection, unbundled network elements or the ability to resell U S WEST services. Include, list and describe the status of all suits or actions at law, other litigation, or administrative proceedings of any type, involving your company U S WEST's policies and practices in Washington state regarding interconnection, unbundled network elements, or resale.

III. Section 271(c)(1)(A) - Presence of a Facilities-Based Competitor

Section 271(c)(1) of the Act requires the presence of a facilities-based CLEC. Each CLEC should respond to the following questions:

1. Is your company registered by the WUTC as a facilities-based CLEC?
2. Is your company currently providing service to local customers using its own facilities –or a combination of U S WEST's and its own facilities? Describe how service is being provided (e.g., U S WEST's unbundled loops connected to your company's switch).
3. To what extent are you providing: i) business exchange service; ii) residential exchange service, or iii) exchange and/ or special access services. State the number of customers actually receiving service in each category.
4. For each of the services described in # 3 above, indicate whether the services are provided via: i) resale; ii) UNEs, or iii) entirely over facilities you own.
5. If you are not providing any of the services listed in # 3 to any customer segment, do you have plans to offer any of those services, and if so, when?
6. Give the geographic location of local exchange customers you serve, by type of customer. Indicate whether any service segment (for example, residential) is predominantly made up

of employees of your company.

7. How many loops (business and residential), by type (i.e., DSO, DS1), do you own or lease throughout U S WEST's service territory, and on an exchange basis?
8. How many end-office switches and line-side switch ports do you own or lease throughout U S WEST's service territory, and on an exchange basis?
9. On a statewide and exchange basis, how many U S WEST loops (business and residential), by size (i.e., DSO, DS1), are connected to a switch you own or control?
10. On a statewide and exchange basis, how many loops (business and residential), by size (i.e., DSO, DS1), that you own or lease are connected to U S WEST switches?
11. List the facilities you own or control in U S WEST's service territory and indicate where they are located.
12. Describe your current facilities construction or expansion projects in U S WEST's service area and anticipated completion dates.

IV. Section 271(c)(1)(A) - Interconnection Agreements

To determine whether or not U S WEST meets the requirements of Section 271's "Track A", the Commission requests the following information:

1. Do you have an interconnection agreement with U S WEST? If so, when was it effective? If not, are you currently negotiating an agreement with U S WEST?
2. What services are you currently purchasing under your interconnection agreement?
3. If you do not have an interconnection agreement with U S WEST, are you purchasing services from under U S WEST's tariffs? If so, which services are you purchasing?
4. Does your interconnection agreement contain an implementation schedule? If so, how detailed is the implementation schedule?
5. If your interconnection agreement with U S WEST has an implementation schedule, has U S WEST met the commitments specified? Give specific citations to the interconnection agreement. Has your company met all of its commitments specified in the agreement?
6. Under your interconnection agreement with U S WEST, provide traffic data for all traffic terminated to U S WEST separately, on a resale and facilities basis. For traffic terminated

on a facilities basis distinguish between local and intraLATA toll traffic. All reports should include the twelve most current months.

V. Section 271(c)(2)(B) - Competitive Checklist

For each Section 271 checklist item, each CLEC should provide relevant detailed information in response to the questions below. For each applicable checklist item answer the following with quantitative information, and in tabular format where possible.

1. Which items on the competitive checklist has U S WEST satisfied or not satisfied? Support conclusions with relevant documentation.
2. Which of the fourteen checklist items is U S WEST presently providing to your company on a commercial basis? Are you purchasing checklist items pursuant to an interconnection agreement that was approved by this Commission under section 252 of the Act? If not, under what terms are the items being purchased?
3. How many of each checklist item is U S WEST providing to your company?
4. Give the date that the request for each checklist item was made by your company.
5. Give the date U S WEST began providing each item and the time period for which it was provided (i.e., continuous or discontinued, and applicable time period).
6. Specify whether your company is using these items to provide service to your own retail customers.
7. Describe the steps U S WEST taken to ensure your company nondiscriminatory access to each item.
8. Describe the steps U S WEST has taken to ensure that each item is available to your company at just and reasonable rates.
9. What pricing methodology does U S WEST use for each item?
10. What steps does U S WEST follow to provide your company with access to poles, ducts, and rights-of-way?
11. Describe the performance standards U S WEST meet regarding the quality, reliability, and timeliness of providing checklist items.
12. How were those performance standards determined?

13. Describe how the quality and reliability of checklist items that U S WEST is providing to your company are comparable to the quality and reliability of such items U S WEST provides to itself or its own customers.
14. Describe how the quality and reliability of checklist items that U S WEST is providing to your company are consistent with any current or expected national standards.
15. Has your company raised significant complaints about any of the mechanisms that U S WEST has instituted to order, provision, or maintain checklist items and services, or to ensure adequate levels of performance quality on an ongoing basis? If so, describe the complaints and the forum used to address them.
16. If U S WEST is not currently offering a checklist item, answer the following: i) is U S WEST capable of providing the item commercially? ii) would your company defray costs of provisioning the item if provisioning was unique to your company? iii) what are U S WEST's plans, intentions and anticipated schedule to offer the item in the future, and iv) what steps must U S WEST take before they can be deemed to have offered the item?
17. Does U S WEST's OSS system have the capacity to accommodate current or future demand for checklist item services by your company in a reasonable and timely manner? If not, why not?

VI. Public Interest Pursuant to Section 271(d)(3)(C)

Provide any information that your company believes will assist this Commission in establishing whether U S WEST's Section 271 application for interLATA relief is in the public interest, convenience and necessity.

1. Any evidence your company has as to whether U S WEST's entry into the interLATA long distance market is in the public interest, including but not limited to:
 - i) the present state of competition in the provision of local and long distance services;
 - ii) the likely development of further competition in the local and long distance markets if U S WEST does not enter;
 - iii) the likely competitive impact in the local and long distance markets if U S WEST enters the long distance market;
 - iv) a description of the factors that should be considered in assessing whether U S WEST's entry into the long distance market would be in the public interest.
2. Whether the public interest requires the presence of viable local competition in at least the major markets in Washington.

3. Whether such competition should be available to both business and residential customers. If viable competition is not required, whether, as an alternative, any other level or standard or test of competition must be met in order to establish that the application is in the public interest.
4. Whether integrative efficiencies, to producers or consumers, are likely to result from U S WEST's ability to offer both long distance and local service.
5. In what ways, if any, U S WEST's long distance entry or absence is likely to affect the ability of other firms to achieve such efficiencies.
6. What risk exists that U S WEST's market power in local markets could be used to hamper competition in the provision of any telecommunications service, including both local and long distance services.
7. Whether U S WEST's ability or incentive to hamper competition will be affected by its entry into long distance.
8. Whether the entry of U S WEST into long distance will affect the incentives of long distance companies to expand into local service.
9. Whether there is a "first mover" advantage associated with the ability to offer integrated service and, if so, how significant that advantage will be.

(END OF APPENDIX B)

Appendix C

Revised Procedural Schedule

The Commission adopts the following approximate procedural schedule for the workshop process. The Commission expects that the schedule set out herein is the maximum amount of time this process should take unless discovery disputes require an extension. The Commission commits to shortening the schedule by compressing time lines when possible and will delete the fourth workshop and the concluding adjudicative schedule if they are not needed. ***Note: DATES IN THIS SCHEDULE ARE APPROXIMATE. Actual dates will be established by U S WEST's first filing and in prehearing conferences.***

Initial Filing - March 21

U S WEST files its preliminary document with an outline of its FCC application, including a complete list of all of the documents U S WEST intends to file in support of its application. U S WEST also files its complete filing of Workshop I support, including testimony.

Prehearing Conference – March 30

The prehearing conference will explore issues related to process and establish the parties to the proceeding.

Workshop 1 - June 21, 2000

Topics: Checklist items 3, 7-10, 12 and 13 (Poles/Ducts/Conduits, 911/E911, Directory Assistance, Operator Services, White Page Listings, Number Administration, Signaling/Assoc. Databases, Dialing Parity and Reciprocal Compensation).

Dates:	3/21/00	Filing of U S WEST's outline application and list of documents. Complete Filing of Workshop I support, including testimony.
	3/30/00	Prehearing conference
	5/21/00	Answering Testimony
	6/5/00	U S WEST Rebuttal Testimony
	6/21/00	3-day Workshop
	7/6/00	1-day Follow-up Workshop
	7/27/00	Circulation of Staff Summary of Workshop Results and Draft Recommendations to FCC on relevant topics
	8/4/00	Presentation to Commissioners – parties present basic information to Commissioners, respond to Commissioner questions.

Workshop 2 - November 6, 2000

Topics: Checklist Items 1, 11, and 14 (Interconnection/Collocation, Number Portability, and Resale); Section 272 Affiliate Issues

Dates: 8/7/00 Complete Filing by U S WEST, including testimony
8/11/00 Prehearing conference
10/7/00 Answering Testimony
10/20/00 U S WEST Rebuttal Testimony
11/6/00 5-day Workshop
11/28/00 2-day Follow-up Workshop
12/7/00 Circulation of Staff draft recommendations to FCC
12/11/00 Presentation to Commissioners – parties present basic information to Commissioners, respond to Commissioner questions.

Workshop 3 – March 12, 2001

Topics: Checklist Items 2, 4, 5, and 6 (UNEs, Loops, Transport, and Switching)

Dates: 12/12/00 Complete Filing by U S WEST, including testimony
2/12/01 Answering Testimony
2/26/01 U S WEST Rebuttal Testimony
3/12/01 5-day Workshop
3/26/01 2-day Follow-up Workshop
4/9/01 Circulation of Staff draft recommendations to FCC
4/16/01 Presentation to Commissioners – parties present basic information to Commissioners, respond to Commissioner questions.

Workshop 4 - July 5, 2001 (*Only if needed*)

Topics: Issues not addressed or not resolved in previous three workshops.

Dates: 4/16/01 Pre-workshop Conference to identify issues and confirm schedule.
5/16/01 U S WEST Filing
6/7/01 Answering Testimony
6/21/01 Rebuttal Testimony
7/5-7/01 2-Day Workshop
7/21/01 Circulation of Staff Draft
8/1/01 Presentation to Commissioners – parties present basic information to Commissioners, respond to Commissioner questions.
8/21/01 Commission adopts draft recommendation to FCC
9/1/01 U S WEST Files FCC Application with WUTC

U S WEST's filing with the WUTC will also start the 90-day process set out in the October 29, 1997 Interpretive and Policy Statement. As noted above, however, if the parties' expectations are

satisfied and all or nearly all issues are settled, and if the workshops have allowed the discovery and have generated the expected information, the actual schedule -- to be established at a prehearing conference -- will be substantially shorter. If the workshops have been fully successful, the adjudicative process may be eliminated or concluded summarily.