BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into U S WEST Communications, Inc.'s Compliance with § 271 of the Telecommunications Act of 1996	Docket No. UT-003022
In the Matter of U S WEST Communications, Inc.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996	Docket No. UT-003040 QWEST CORPORATION'S PERFORMANCE DATA FOR WASHINGTON [September 2000 – August 2001]

Qwest Corporation ("Qwest") hereby provides the Washington Utilities and Transportation Commission (the "Commission") with an overview of its August 2001 performance results,[1] which show that Qwest has continued to provide interconnection, unbundled network elements ("UNEs"), and resale to CLECs in a nondiscriminatory manner throughout the state of Washington. The FCC has made clear that "the most probative evidence of nondiscriminatory access to interconnection and UNEs is actual commercial usage."[2] Recently, Qwest began presenting its performance data on a checklist item basis to establish that Qwest is meeting its 271

[1] The data referenced and summarized in this filing is the data known as of October 2, 2001. Qwest anticipates that, based on revisions arising from ongoing ROC review processes, the data may or will be amended from time to time. If so, Qwest's subsequent filings will reflect any revisions to the data.

[2] *Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) and Verizon Global Networks, Inc., for Authorization to Provide In-Region, InterLATA Services in Massachusetts*, CC Docket 01-9, Memorandum Opinion and Order, ¶ 12 (April 16, 2001) ("*Massachusetts Order")* at ¶ 12.

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objectives under performance measures created in regional ROC workshops. Qwest now presents its September 2000 to August 2001 data to show that Qwest has sustained, if not improved upon, the high level of performance described in its previous filings.

I. EXECUTIVE SUMMARY

A. Overview

Parties to the ROC workshops negotiated performance measures ("PIDs") and, in virtually every circumstance, the expected level of performance that would provide CLECs with a meaningful opportunity to compete in the marketplace. Under the ROC performance measures, adequate performance is determined in one of two ways: (1) parity with retail[3] or, (2) where no retail analog exists, by meeting a performance objective or "benchmark." When a retail analogue exists, the FCC requires that Qwest serve CLECs in "substantially the same time and manner" as Qwest provides the analogous service to retail customers. In ROC workshops, all parties have agreed on statistical methods to determine if the performance is substantially similar.[4] Thus, if Qwest's retail performance is better than wholesale performance, the Commission must look at the statistical result to determine whether the disparity is statistically significant. If it is not statistically significant, there is no concern. When the PID has an associated performance benchmark, there is no concern when Qwest achieves the benchmark.

A detailed review of the data makes it very clear that Qwest continued to provide most every element of the checklist to CLECs at a high level of quality in August. Actual performance

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[3] For purposes of this filing, Qwest defines "parity" consistently with the FCC's analytical framework for determining when a BOC's wholesale performance reflects non-discriminatory treatment as compared to its retail performance. Thus, Qwest uses "parity" to mean when (1) wholesale performance exceeds retail performance; (2) wholesale and retail performance are identical; or (3) retail performance is better than wholesale performance, but not to a statistically-significant degree. *In the Matter of the Application by Bell Atlantic New York for Authorization under Section 271 of the Communications Act to Provide In-region InterLATA Service in the State of New York*, 15 FCC Rec'd. 5953 (1999) *("New York Order")*, ¶ 58 ("In this case, we conclude that to the extent there is no statistically significant difference between Bell Atlantic's provision of service to competitive LECs and its own retail customers, we need not look further.").

[4] Under the statistical standards the ROC adopted, if the Z score is higher than +1.645, retail performance is better than wholesale performance by a statistically significant margin. The same is true if the parity score is a positive number. The two statistical methods generally work together meaning that when the Z score is higher than 1.645, the parity score usually will be a positive number, indicating that retail performance exceeds wholesale performance by a statistically significant margin.

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data from September 2000 through August 2001 in Washington is attached as Exhibit 1 on a checklist item basis.

B. Qwest's Actual Performance Meets 271 Objectives

The attached performance results show that Qwest continues to provide interconnection, collocation, access to UNEs, emerging services, number portability, resale, and the remaining checklist items in a manner that is either "substantially the same as" Qwest's provides to its retail operations, or that provides "efficient CLECs with a meaningful opportunity to compete."[5] In particular:

- **Interconnection:** In August 2001, Qwest met 93.5% of its installation commitments to CLECs for interconnection trunks. The average installation interval was 17.6 days, which is comparable to, or better than, the installation interval for Qwest's Feature Group D trunks (the agreed upon retail analogue). The trouble report rate was extremely small – 0.02%. When troubles did occur, Qwest cleared 93.5% of those trouble reports within four hours. Blockage on CLEC trunks to Qwest end offices was consistently well below the benchmark of 1%, at 0.13%.
- **Collocation:** In August 2001, Qwest met all of its installation commitments for collocation requests in Washington. Qwest also completed all collocation feasibility studies in an average of 7 days, meeting the 10-day benchmark.
- **UNE-P:** In August 2001, Qwest provisioned roughly 65% of its UNE-P, or unbundled network element platform, orders without a technician dispatch. For these non-dispatched orders, Qwest met 100% of its installation commitments to CLECs with an average installation interval of 2.66 days. Qwest completed 97% of all UNE-P installations without a CLEC issuing a trouble report. When trouble did occur, Qwest resolved CLEC out of service troubles 90.3% of the time within 24 hours, and in a mean time equivalent to Qwest repairs for equivalent retail customers.
- **Loops:** In August 2001, Qwest's performance was outstanding in provisioning all types of unbundled loops; however, because analog loops (voice loops) and 2-wire non-loaded loops (DSL-capable loops) accounted for more than 91% of all CLEC loops installed in August, Qwest will discuss those here. For analog loops, Qwest provisioned 99.5% of its loops on time (besting the ROC 90% benchmark) in an average interval of 5.7 days, just below the ROC's 6-day benchmark. For 2-wire non-loaded loops, Qwest met 96.4% of its installation commitments to CLECs, with an average interval of 5.2 days. This performance exceeded benchmarks in both categories. For both types of loops, Qwest's installations were trouble free more than 96% of the time. For all coordinated cutovers, whether they be analog loops, non-loaded loops, or some other type of loop, Qwest provisioned in excess

[5] These standards are the verbatim standards set by the FCC. Where retail parity exists, Qwest must provide service to CLECs in substantially the same time and manner." This is managed in the PIDs through use of statistical methodology. Where no retail analog exists, Qwest must provide an "efficient competitor a meaningful opportunity to compete." The ROC has set benchmarks in these situations that the ROC collectively determined would give CLECs a meaningful opportunity to compete.

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of 96% of the cutovers on time, exceeding the ROC benchmark and far exceeding that deemed acceptable by the FCC in New York.

- **Number Portability:** In August 2001, Qwest completed its work in provisioning number portability in excess of 96% of the time irrespective of whether a Qwest loop or CLEC loop was the underlying facility involved. This performance exceeds the 95% benchmarks set in the ROC.
- **Resale:** In August 2001, 59.8% of resale orders were provisioned without a technician dispatch. In such circumstances, Qwest met 99.79% of its installation commitments for resold residential customers, 98.31% for business customers, and 100% for Centrex and Centex 21 customers. There were no ISDN, DSO or above or Frame Relay orders in August. In the unlikely event that service was delayed, Qwest established service for wholesale customers at parity with Qwest retail customers in virtually every circumstance. With respect to maintenance and repair, for residential and business POTS, Centrex and Centrex 21, whether dispatches were required or not, Qwest cleared out of service troubles within 24 hours on average 92.3% of the time and always at parity with equivalent Qwest retail service.

In September, the Liberty Consulting Group completed its audit of the above mentioned performance measures and concluded that Qwest's performance data "accurately and reliably report actual Qwest performance." The final audit report was attached to Qwest Corporation's Performance Data for Washington [August 2000-July 2001], filed September 28, 2001 ("the Qwest August-July Filing"), as *Exhibit 3*. Consequently, the Commission may confidently rely on the performance results in assessing the quality of interconnection, resale and access to UNEs. Nonetheless, to provide the Commission with even greater confidence in Qwest's performance data, Qwest agreed to participate in data reconciliation with any interested CLEC. Three CLECs – AT&T, WorldCom and Covad – asked Liberty to reconcile data on a few of Qwest's performance measures. Qwest will present the results of that reconciliation process to the Commission when it has concluded, which is currently scheduled to occur on October 31, 2001.

C. Evidentiary Standards

The FCC places tremendous emphasis on PIDs negotiated through an open process, such as occurred at the ROC. Specifically, the FCC concluded that when "[performance] standards are developed through open proceedings with input from both the incumbent and competing carriers, these standards can represent informed and reliable attempts to objectively approximate whether competing carriers are being served by the incumbent in substantially the same time or manner or

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in a way that provides them a meaningful opportunity to compete."[6] The FCC held:

> Thus, to the extent there is no statistically significant difference between a BOC's provision of service to competing carriers and its own retail customers, the Commission generally need not look any further. Likewise, if a BOC's provision of service to competing carriers satisfies the performance benchmark, the analysis is usually done.[7]

Even when statistically significant differences in performance exist, the Commission may "conclude that such differences have little or no competitive significance in the marketplace."[8] The differences may be "slight, or occur in isolated months."[9] In such cases, "the Commission may conclude that the differences are not meaningful in terms of statutory compliance."[10] A steady improvement in performance over time indicates that problems are being resolved.[11] Moreover, when "there are multiple performance measures associated with a particular checklist item, the Commission considers the performance demonstrated by all the measurements as a whole. Accordingly, a disparity in performance for one measure, by itself, may not provide a basis for finding noncompliance with the checklist."[12]

Thus, the ultimate issue before this Commission is whether Qwest's overall performance on a checklist item by checklist item basis is adequate. The FCC has made clear that when performance metrics are negotiated, ILECs such as Qwest need not meet the negotiated standards 100% of the time to satisfy 271. This would be a virtual impossibility. The Commission's role is to assess all of the PIDs for a checklist item in totality and decide whether the performance is

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[6] *Massachusetts Order at ¶ 13.*

[7] *Application of Verizon New York Inc., Verizon Long Distance, Verizon Enterprise Solutions, Verizon Global Networks, Inc., and Verizon Select Services, Inc. for Authorization to Provide In-Region, InterLATA Services in Connecticut*, FCC 01-208, App. D, ¶ 5 (July 20, 2001) *("Connecticut Order")* at Appendix D-5, ¶ 8 (July 20, 2001).

[8] *Id.*

[9] *In the Matter of the Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma*, CC Docket No. 00-217, FCC 01-29 (rel. January 22, 2001) ("*Kansas/Oklahoma Order")* at ¶ 32..

[10] *Connecticut Order* at Appendix D-5, ¶ 8.

[11] *New York Order* at ¶ 59.

[12] *Connecticut Order* at Appendix D-5, ¶ 9.

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adequate. Qwest, therefore, presents this August data to represent that its overall performance continues to meet the requirements of Section 271.

D. Detailed Discussion of Checklist item Performance

1. Checklist Item No. 1: Interconnection/Trunk Blocking/Collocation

a. *Interconnection*

Interconnection trunks allow the mutual exchange of traffic between Qwest and CLECs. Qwest has continued to meet the ROC's performance standards for provisioning, maintaining, and repairing interconnection trunks thereby keeping trunk blockage low.

Trunk Blockage. In August 2001, trunk blockage on CLEC interconnection trunks to Qwest tandem offices continued to be virtually non-existent; specifically, 0.03%, far below the ROC's 1% benchmark. *Exhibit 1* at 9, NI-1A. Trunk blockage on CLEC interconnection trunks to Qwest end offices was equally insignificant, with 0.13% blockage, again far below the ROC's 1% benchmark. *Id.*, NI-1B.

Trunk Installation Measures. In Zone 1 (high-density areas), Qwest met 91.84% of its trunk installation commitments to CLECs in August, with an average interval of 17.74 days. Both the percentage commitments met and the average installation interval were at parity to that Qwest provided to its retail customers. *Id*. at 1, OP-3, OP-4. In Zone 2 (low-density areas), Qwest met 100% of its trunk installation commitments to CLECs in August with an average interval of 17.18 days. In both situations, Qwest's wholesale performance was at parity with that Qwest provided to its retail customers. *Id.* at 2, OP-3, OP-4.

Delays incurred installing interconnection trunks continued to be rare; however, when they did occur, they were short. Delays averaged 4.45 days in Zone 1 and 2 days in Zone 2 when the delay was for non-facility reasons. *Id.* at 1-2, OP-6A. In both cases, this performance was at parity with Qwest's retail performance. *Id*. There was only 1 interconnection trunk delayed for facility reasons in Zone 1 and none in Zone 2. *Id.* at 1-2, OP-6B.

Overall, installation quality was excellent. Once a trunk was installed, it rarely had

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trouble. In August, 98.95% of all new trunks installed did not experience a trouble in the first 30 days. *Id*. at 3, OP-5. This was at parity with Qwest's retail results. *Id.*

***Trunk Maintenance and Repair Measures*.** In the month of August, Qwest continued to achieve similar success in maintaining and repairing interconnection trunks. The rate of trouble reports for interconnection trunks was again extremely low – 0.02%. While not at parity with retail results (0.01%), the overall result is excellent. *Id.* at 6, MR-8. This is clearly a case where the Commission should consider all other repair measures since Qwest established wholesale performance at parity with retail performance for all other related measures in August. *Id*. at 5-6, MR-5, MR-6, MR-7, MR-10.

Qwest cleared 92.31% of CLEC trouble reports in Zone 1 within 4 hours and 100% of CLEC trouble reports in Zone 2 within 4 hours. *Id.* at 5, MR-5. These wholesale results were at parity with Qwest's retail performance. *Id.* The mean time to restore interconnection service to CLECs was 3 hours, 27 minutes in Zone 1 and 58 minutes in Zone 2. *Id*. at 5-6, MR-6. These results continue to demonstrate that Qwest is providing interconnection trunking to competitors on a nondiscriminatory basis.

b. *Collocation*

Collocation allows CLECs to place equipment in Qwest central offices or other structures such as remote terminals. As a reminder, in March 2001, in response to two collocation decisions from the FCC, the ROC significantly revised the collocation PIDs. The revised PIDs set installation intervals of 90 days when the collocation is forecasted, and 120-150 days when no forecast is provided (depending on whether major infrastructure modifications are necessary). The PIDs also set a 10-day benchmark for feasibility studies.

Qwest's August collocation performance under the new ROC PIDs continued to be perfect. Qwest met the 120-day and 150-day installation benchmarks, with average intervals substantially shorter than the ROC set benchmark. There were no requests for the 90-day installation interval. *Id.* at 7, CP-1A, CP-1B, CP-1C. Qwest also completed 100% of its installation commitments on

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time. *Id.* at 7-8, CP-2B, CP-2C.

Today, collocation has two measurable components: installations and feasibility studies. Feasibility studies are completed in the first 10 days of the installation interval and require Qwest to inform CLECs whether the central office where the collocation will be placed has the requisite space and power. Last month, Qwest reported that it met the collocation feasibility obligations 62.5% of the time with an average interval of 11.5 days, missing the ROC 10-day benchmark. *Id.* at 8, CP-3, CP-4. Qwest also explained that the relatively low percentage of feasibility commitments met resulted due to the September 4, 2001 Performance Measure Audit Report released by Liberty Consulting on the collocation PIDs. The audit discovered that Qwest had "a problem in using the wrong date to begin the feasibility and ready-for-service intervals."[13] Qwest then stated that it had "modified its practice to ensure that the 10-day interval is met with consistency.[14] Future months performance data should bear this out." The August data bears this out. Qwest met 100% of its feasibility studies in an average of 7 days, besting both ROC performance benchmarks. *Exhibit 1* at 8, CP-3, CP-4.

2. Checklist Item No. 2: Access to Unbundled Network Elements

In its prior orders on section 271 applications, the FCC has discussed access to OSS and UNE Combinations under checklist item 2 and has consistently demanded that, in the absence of significant commercial volumes, BOCs must subject their OSS to third party testing – and successfully pass such tests – prior to obtaining section 271 approval. Hewlett-Packard, the pseudo CLEC, is currently testing Qwest's OSS, with KPMG Consulting serving as test administrator. Qwest will report the results of the third party test when it is completed. In the interim, Qwest's commercial performance for OSS is discussed below.

a. *OSS*

Qwest's OSS is a combination of systems, databases, and personnel integral to its provision of pre-ordering, ordering, provisioning, maintenance and repair and billing services to CLECs. In

[13] Qwest August-July Filing, *Exhibit 3* at 6.

[14] *Id.* at 8-9 (b. Collocation).

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the July 2000 to June 2001 performance data filing, Qwest described each of these aspects of OSS in detail.[15]

Gateway Availability. The gateway availability PIDs measure the percentage of time the systems for interfacing with Qwest's computer network are available to CLECs. The ROC benchmark for all interfaces is availability 99.25% of the time. In August, Qwest met the 99.25% benchmark for its IMA-EDI and EXACT interfaces (achieving 100% for both). *Id.* at 11-12, GA-2, GA-4. For EB-TA, Qwest met the benchmark in August (also achieving 100% performance). *Id.* at 12, GA-3. Although Qwest missed one of the three IMA-GUI benchmarks in August with the gateway available 97.38% of the time, this is the first time in 12 months the benchmark was missed and Qwest met the benchmarks for the other two IMA-GUI PIDs.[16] *Id*. at 11, GA-1A, GA-1B, GA-1C.

Pre-Order Response Times. The ROC PIDs require Qwest to measure the time it takes its computer network to respond to various CLEC requests for information. For the IMA-GUI and EDI interfaces, the PIDs assess the time it takes CLECs to schedule appointments, inquire about service availability times, conduct facility checks, validate addresses, get CSRs, make telephone number reservations, and provide loop qualification information. The PIDs separately track the time it takes CLECs to submit requests, the time it takes Qwest to respond, and the time it takes to accept a CLEC order. The PIDs then aggregate those times and apply benchmarks ranging from 10-25 seconds.

In August, Qwest again met every aggregate pre-order response benchmark for IMA-GUI and EDI. *Id.* at 13-23, PO-1A-1 (Total), PO-1A-2 (Total), PO-1A-3 (Total), PO-1A-4 (Total), PO-1A-5 (Total), PO-1A-6 (Total), PO-1A-7 (Total), PO-1B-1 (Total), PO-1B-2, PO-1B-3, PO-1B-4, PO-1B-5, PO-1B-6 (Total), PO-1B-7.

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[15] Qwest Corporation's Performance Data For Washington [July 2000-June 2001] (the "Qwest July-June Filing"), at 20-22.

[16] This slight deviation was as a result of a computer virus that circulated throughout the world in August. Qwest had to take its gateway down for 11 hours as a result to avoid greater potential problems. But for this unavoidable circumstance, Qwest had its gateway operable 100% of the time.

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Electronic Flow-Through. The flow-through PIDs measure the percentage of time that CLEC Local Service Requests ("LSRs") are converted into service orders recognized by Qwest's systems and "flowed-through" to Qwest's back-end systems without manual intervention. The flow-through PIDs measure the overall flow-through rates (PO-2A) and the flow-through rates for orders that are designed to flow through (PO-2B).

Qwest's flow-through PIDs are diagnostic, primarily because the FCC does not consider flow-through to be a "conclusive measure of nondiscriminatory access to ordering functions, but as one indicium among many of the performance" of Qwest's OSS.[17] The FCC recognizes that CLECs can impact heavily the flow-through rates that a BOC can achieve – efficient CLECs can achieve high flow-though rates while other, less efficient CLECs have lower flow-through rates.[18] For these reasons, the FCC has focused less on actual flow-through rates than on whether the BOC's OSS are *capable* of flowing orders through.[19]

In August, Qwest's flow-through rates for eligible LSRs sent through the IMA-GUI were 69.57% for POTS Resale, 70.3% for Unbundled Loops, 89.94% for Local Number Portability ("LNP"), and 86.55% in August for UNE-P POTS. *Exhibit 1* at 24, 25, 26, 27, PO-2B-1. All but one of these results (POTS Resale) represents an improvement in performance from July. *Id.*

In August, electronic flow-through for all eligible LSRs received via IMA EDI showed a slight decrease from July, but was still substantially improved overall -- 56.05% for POTS Resale, 71.01% for Unbundled Loops, 92.35% for LNP, and 63.64% for UNE-P POTS. *Id.*, PO-2B-2. The main reason EDI flow-through results have dropped is due to one particular CLEC. This CLEC submits a very high percentage of our Unbundled Loop and Resale LSR's through the EDI interface; however, the LSRs this CLEC submits contain problems that prevent them from flowing through. Qwest is currently working with this CLEC to resolve the differences. The particular CLEC has decided to wait to make the correction to their side of the EDI interface until Qwest

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[17] *Massachusetts Order* at ¶ 77.

[18] *Id.* at ¶¶ 78, 80.

[19] *Id.* at ¶¶ 77, 80.

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releases its next version of EDI. This is scheduled to occur in late October.

LSR Rejections. There are times when CLECs do not adequately complete LSRs, generating an "LSR Rejection." For the IMA-GUI and EDI interfaces, the ROC PIDs require Qwest to track the length of time it takes Qwest to submit LSR rejection notices to CLECs. The PIDs set benchmarks in hours for manual rejections and benchmarks in seconds for electronic rejections.

For the IMA-GUI interface, Qwest again met the 12-hour (manual) and 18-second (electronic) benchmarks for LSR rejections in August. The LSR manual rejection notice interval was 3 hours, 5 minutes and the electronic interval was 6 seconds; both were improvements from July's excellent performance. *Id.* at 28, PO-3A-1, PO-3A-2. For EDI, Qwest also met the 12-hour and 18-second benchmarks in August. The LSR manual rejection notice interval was 3 hours, 35 minutes and the electronic interval was 10 seconds. *Id.* at 28-29, PO-3B-1, PO-3B-2. Qwest also met the 24-hour LSR rejection benchmark for manual and IIS in August. The LSR manual and IIS rejection notice interval was 9 hours, 53 minutes. *Id.* at 29, PO-3C.

Firm Order Confirmations. Qwest submits and measures the percentage of Firm Order Confirmations ("FOCs") Qwest sends to CLECs on time for various products and services. FOCs identify the due date CLECs should expect to receive the requested service. In August for resale, Qwest continued to submit 100% of FOCs on time for LSRs processed electronically through IMA-GUI and EDI, easily surpassing the ROC 90% benchmark. *Id.* at 31, PO-5A-1(a), PO-5A-2(a). For IMA-GUI LSRs processed in part manually, Qwest continued to meet the 90% benchmark in August (97.46%). *Id.*, PO-5B-1(a). For EDI LSRs processed in part manually, Qwest's performance in August was 94.74%, exceeding the 90% benchmark. *Id.*, PO-5B-2(a). In August, Qwest also met the 90% benchmark for orders processed on a completely manual basis (96.36%). *Id.* at 32, PO-5C-(a).

Qwest's performance with respect to LSRs for unbundled loops continued at an even higher level. For LSRs submitted electronically through either interface, Qwest exceeded the 95%

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benchmark by performing at 99.41% to 100%. *Id.* at 33, PO-5A-1(b), PO-5A-2(b). For those processed in part manually, Qwest exceeded the 90% benchmark by performing at 98.85% and 99.17%. *Id.* at 33, PO-5B-1(b), PO-5B-2(b). For LSRs submitted completely on a manual basis, Qwest returned FOCs on time for 100% of the LSRs during August, surpassing the 90% benchmark. *Id.* at 34, PO-5C-(b).

In August, Qwest again met the ROC benchmarks for FOCs on time for LNP, processing in excess of 99% of the FOCs on a timely basis irrespective of whether the LSRs were processed electronically (100% for IMA and EDI), or processed in part manually (99.57% for IMA and 99.32% for EDI). *Id.* at 35, PO-5A-1(c), PO-5A-2(c), PO-5B-1(c), PO-5B-2(c). In August, Qwest also met the 90% benchmark for manually processed LSRs (100%). *Id.*, PO-5C-(c). Qwest also far surpassed the 85% benchmark once again for LIS trunks as Qwest submitted 100% of FOCs on time. *Id.* at 37, PO-5D.

Jeopardy Notifications. When it becomes evident that Qwest will not meet an expected due date for the provision of a product or service, Qwest submits a jeopardy notification. In August, Qwest submitted jeopardy notices to CLECs for non-designed services, on average, 1.6 days before the scheduled delivery date, at parity with Qwest retail performance. *Id.* at 39, PO-8A. Qwest slipped in August with regard to the timeliness of its jeopardy notices. *Id.*, PO-9A. It should be noted, however, that this was the first time in 9 months that wholesale and retail results were not at parity on this measure. *Id.*

For unbundled loops, Qwest's wholesale and retail results for average jeopardy notice intervals and timely jeopardy notices were at parity for August, as it has been every month dating back to September 2000. *Id.* at 40, PO-8B, PO-9B.

Qwest submitted no jeopardy notifications to CLECs for LIS trunks in August. *Id.* at 41, PO-8C, PO-9C.

CLEC jeopardy notices were also few and far between for UNE-P POTS. Only one notice was issued in Washington with respect to UNE-P with an average jeopardy notice interval of 3

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days. This was at parity with retail performance. *Id.* at 42, PO-8D, PO-9D.

Access to Centers. Qwest also measures the access that both CLEC and Qwest customers have to Qwest centers. PID OP-2 measures the percentage of calls to Qwest's interconnection provisioning center that were answered within 20 seconds. In August, Qwest's continued its excellent wholesale performance, with 96.30% of all CLEC calls answered within 20 seconds. *Id.* at 45, OP-2.

PID MR-2 similarly measures the percentage of calls to Qwest's interconnection repair center that were answered within 20 seconds. Qwest's wholesale performance in August was outstanding once again, with Qwest answering 95.11% of the wholesale calls within 20 seconds. *Id.*, MR-2.

Billing. In August, Qwest continued to provide CLECs with timely access to usage records. Such records were provided to CLECs in an average of 2.45 days, an improvement over Qwest's May, June and July performance. *Id.* at 46, BI-1A. Qwest also provided switched access usage records to CLECs 86.33% of the time, an improvement over all prior months but below the 95% benchmark. *Id.* at 46, BI-1B. Qwest also delivered all bills to CLECs within the 10-day period prescribed by PID BI-2. *Id.* at 47, BI-2.

Qwest's bills to CLECs were also accurate and complete. In August, 99.94% of Qwest's bills to CLECs for resale and UNEs did not require an adjustment due to an error. *Id.* at 48, BI-3A. Qwest's bills to CLECs were also complete 70.94% of the time, showing that the significant dip in July (24.87%) was an aberration. *Id.* at 49, BI-4A.

b. *Unbundled Network Element Combinations*

Checklist Item 2 also requires Qwest to provide CLECs with UNE Combinations, specifically UNE-Platform ("UNE-P") and Enhanced Extended Loops ("EELs"). Qwest has successfully met increasing demand for these products by promptly installing and repairing them for CLECs.

Installation of UNE-P. Qwest installed 64.7% of all UNE-P lines in Washington in

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August without a dispatch. *Id.* at 50-52, OP-3. For UNE-P orders in that category, Qwest continued its strong performance by meeting 100% of its installation commitments in August. *Id.* at 52, OP-3. During that period, the average installation interval was 2.66 days, at parity with retail results. *Id.*, OP-4. Installation quality also continued to be excellent – Qwest completed 97% of all UNE-P installations (dispatched and non-dispatched) without a CLEC filing a trouble report within 30 days of installation. *Id.* at 53, OP-5.

For dispatches within MSAs (which accounted for only 15.7% of UNE-P installations in August), Qwest met 75% (6 of 8) of its CLEC installation commitments in an average of 2.75 days. *Id.* at 50, OP-3, OP-4. While Qwest met more commitments on the analogous retail service, the average interval for CLECs was approximately 2 days shorter for CLECs than for Qwest's retail customers. For dispatches outside MSAs, Qwest met 100% of its installation commitments to CLECs in August in an average of 1.2 days. *Id.* at 51, OP-3. For dispatches outside of MSAs, Qwest's wholesale performance was at parity with retail performance. *Id.* For dispatches within MSAs, only 2 orders were delayed and were cleared within 1-2 days and at parity with Qwest's retail service. *Id.* at 50-51, OP-6A, 6B.

Repair of UNE-P. In August, the overall trouble rate for CLEC UNE-P continued to be outstanding; specifically, a mere 0.86%, at parity with retail installations. *Id.* at 58, MR-8. When troubles occur, Qwest resolved them efficiently. When no dispatch of a technician is required to clear the trouble, Qwest cleared 100% of CLEC out of service reports within 24-hours. *Id.* at 57, MR-3. The mean time to restore UNE-P service was a mere 1 hour, 58 minutes, again at parity with retail repairs. *Id.* at 58, MR-6.

Qwest provided similar outstanding service during August when repair of UNE-P lines required a dispatch of a technician. Qwest cleared 84.62% of troubles within 24 hours when repairs required a dispatch within an MSA and 91.67% of troubles within 24 hours when repairs required a dispatch outside an MSA. These results were at parity with retail performance. *Id.* at 55-56, MR-3. When a dispatch was required, Qwest cleared troubles during August in an average

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of 16 hours, 56 minutes within MSAs and 17 hours, 31 minutes outside MSAs. These results were at parity with retail service. *Id.* at 55-56, MR-6.

Enhanced Extended Loops. Four additional EELs were provisioned in August (all in Zone 1). In Zone 1, Qwest met its installation commitments to CLECs for 3 of the 4 orders. *Id.* at 60, OP-3. The average installation interval was 13.25 days. *Id.*, OP-4. Given the low volumes of EELs, these performance measures are still "diagnostic," meaning for information purposes only.

3. Checklist Item No. 3: Access to Poles, Ducts, Conduits, and Rights of Way

The ROC has not adopted any performance measures for this checklist item.

4. Checklist Item No. 4: Unbundled Loops

Qwest's performance results continue to demonstrate that Qwest is provisioning unbundled loops on a non-discriminatory basis for CLECs in Washington. Qwest is fulfilling orders promptly, with minimal service problems, and has a strong maintenance and repair record.

a. *Analog Voice Loops*

Installation of Unbundled Analog Loops. Analog loops accounted for 81.4% of all unbundled loops installed in Washington in August. *Id.* at 64, 65, 71, 72, 78, 79, 84, 85, 90, 91, 97, 98, 103, 104, OP-3. Qwest's installation record for unbundled analog loops continues to be excellent. In Zone 1, Qwest met 99.47% of its installation commitments in August, far exceeding the ROC's 90% benchmark. *Id*. at 64, OP-3. The results were virtually identical in Zone 2, where Qwest met 99.52% of its installation commitments in August. *Id.* at 65, OP-3. These results were at parity with retail performance. *Id.* at 64-65, OP-3.

In August, Qwest averaged 5.68 days (down from 5.77 days in July) to install CLEC loops in Zone 1 and 7.34 days in Zone 2 (down from 8.11 days in July). *Id.* at 64-65, OP-4. When delays did occur for non-facility reasons Qwest provisioned the delayed circuits in both Zone 1 and Zone 2 at parity with retail circuits. *Id.* at 65-66, OP-6A. Zone 2 delays that occurred due to facility reasons were also at parity with retail circuits. *Id.* at 66, OP-6B. While this measure was not at parity in Zone 1, it had been each prior month in 2001; also, the result was based on only 5

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delayed orders, by far the smallest number of delayed orders to occur in this category in the past year. *Id.* at 65, OP-6B.

Qwest's installation quality continued to be consistently good as well. Qwest installed 96.6% of new loops in August without a CLEC filing a trouble report; those results were at parity with retail performance. *Id.* at 66, OP-5.

***Repair of Unbundled Analog Loops*.** Qwest continued to provide quick and reliable repairs for CLECs. At the outset, it is important to note that repairs were rarely needed. The trouble rate for analog loops continued to be low, a mere 1.33% in August, at parity with the comparable measure for retail loops. *Id*. at 70, MR-8.

Moreover, when repairs were needed, they were performed quickly. In August, Qwest cleared 97.91% of all out of service reports for CLECs within 24 hours in Zone 1, and 100% in Zone 2. *Id.* at 68-69, MR-3. Qwest cleared 100% of all CLEC trouble reports within 48 hours statewide. *Id.*, MR-4. These results were at parity with retail service. *Id*., MR-3, MR-4. Similarly, in August the mean time to restore service to CLECs was 4 hours, 17 minutes (down 23 minutes from July) in Zone 1, and 3 hours, 6 minutes (down 35 minutes from July) in Zone 2, again at parity with retail service. *Id*., MR-6. In August, 18.75% of repaired lines had repeat troubles, at parity with retail service. *Id*. at 69, MR-7.

b. *Coordinated cutovers*

Another key component of loop provisioning is how well Qwest performs coordinated cutovers, what some in the industry call "hot cuts." Qwest opened a new center in Omaha in late March 2001 to manage all coordinated cutovers (the largest percentage of loops ordered). The Omaha Center also made a number of process improvements. Since its opening, performance results have been outstanding. Qwest's on time performance for analog loops improved from 74.55% in March to 98.98% in July and 99.76% in August, better than the 95% ROC benchmark for the third consecutive month. *Id*. at 109, OP-13A (Unbundled Loop – Analog). For all other loops, Qwest's on time performance improved even more, from 52.43% in March to 98.06% in

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August, surpassing the 95% benchmark for the second month in a row. *Id*., OP-13A (Unbundled Loop – Other).

Qwest's coordinated cutover intervals have correspondingly improved. For analog loops, the coordinated cut interval shrunk from 8 minutes in March to 3 minutes in August. *Id.*, OP-7 (Unbundled Loop – Analog). For other loops, the interval fell from 7 minutes in March to 3 minutes in August. *Id.*, OP-7 (Unbundled Loop – Other). Qwest also has improved its coordination with CLECs. In August, Qwest commenced 99.76% of all coordinated cuts for analog loops and 99.78% of all coordinated cuts for other loops with CLEC approval. *Id*. at 110, OP-13B. Again, Qwest has met and exceeded the FCC's accepted test for provisioning hot cuts.[20]

c. ***Non-Loaded (2-Wire) Loops***

Installation of non-loaded (2-wire) loops. These loops accounted for 10.3% of all unbundled loops installed in Washington in August. *Exhibit 1* at 64, 65, 71, 72, 78, 79, 84, 85, 90, 91, 97, 98, 103, 104, OP-3. In August, Qwest achieved the 90% benchmark for CLEC installation commitments met in Zone 1 (97.12%) and Zone 2 (92.45%). *Id*. at 71-72, OP-3. Qwest also provisioned these loops statewide in intervals shorter than the 6-day interval benchmark. *Id,*. OP-4.

On the rare occasions that Qwest was late with a CLEC installation, the delays in August were again kept to a minimum. The average length of delayed days for late installations were at parity with Qwest's retail customers. This was true regardless of whether the delays were caused by facility or non-facility reasons. *Id*., OP-6A, OP-6B.

Qwest continued to install 2-wire non-loaded loops of extremely high quality. In August, 97.81% of CLEC loops were installed without trouble reports – the highest percentage since Qwest's nearly identical performance (97.82%) in February. *Id*. at 73, OP-5. This was at parity with retail performance.

[20] *New York Order* at ¶ 309. In the New York Order, the FCC specified that the minimally-acceptable standard for coordinated cutovers was 90% on-time (see OP-13A), in combination with evidence that fewer than 5% resulted in service outages (see OP-5), and that fewer than 2% of hot cut lines had reported installation troubles (see MR-8).

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Repair of non-loaded (2-wire) loops. The trouble rate for such CLEC loops was a mere 0.32% in August (down from 0.56% in July and 0.74% in May) and was at parity with the rate experienced by Qwest's retail customers. *Id*. at 77, MR-8. When repairs were needed, Qwest performed them promptly. In August, Qwest cleared 100% of CLEC of out of service reports within 24 hours statewide and 100% of all troubles within 48 hours statewide; both results were at parity with Qwest's retail performance. *Id*. at 75-76, MR-3, MR-4.

d. ***Non-Loaded (4-Wire) Loops***

Installation of Non-Loaded (4-Wire) Unbundled Loops. CLECs have not requested a high number of 4-wire loops in Washington; Qwest performed only one CLEC installation in Zone 1 during August and none in Zone 2. *Id.* at 78-79, OP-3. It took Qwest 7 days to install the loop (down from an average of 11.25 days in Zone 1 in July); this performance was at parity with retail results. *Id*. at 78, OP-4. Installation quality was perfect. *Id.* at 80, OP-5.

Repair of Non-Loaded (4-Wire) Unbundled Loops. In August, there were no trouble reports for 4-wire loops provisioned to CLECs. *Id*. at 83, MR-8.

e. ***DS-1 Capable Loops***

Installation of DS-1 Capable Loops. In August, Qwest met 54.35% of its installation commitments in Zone 1 and 44.44% of its commitments in Zone 2. *Id.* at 84-85, OP-3. While this Zone 1 performance was not at parity, the installation interval in Zone 1 was 15.03 days while the comparable retail interval was 15.7 days. *Id.* at 84, OP-4. The installation interval was at parity in both Zones in August and the percent of commitments met in Zone 2 was at parity with retail performance. *Id*. at 84-85, OP-3, OP-4. When delays in provisioning occurred, the average delay CLECs experienced were at parity with that experienced by retail customers regardless of whether the delay was for facility or non-facility reasons. *Id*., OP-6A, OP-6B. Thus, overall installation was at parity for CLECs when all measures are considered together as the FCC recommends.

As to the quality of Qwest's installations, in August, Qwest installed 87.94% of new loops without a CLEC filing a trouble report, at parity with that experienced by Qwest's retail

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customers. *Id.* at 86, OP-5.

***Repair of DS-1 Capable Loops*.** The CLEC trouble rate for DS-1 loops was 3.19% in August. Though the trouble rate for CLECs exceeded that for Qwest's retail customers, the margin of difference was roughly 1%. *Id*. at 89, MR-8.

Qwest has steadily improved its success at restoring CLEC DS-1 service within 4 hours, reaching 83.02% in August (up from 54.29% in July) in Zone 1, at parity to comparable service for retail customers. *Id.* at 88, MR-5 (Zone 1). The results in Zone 2 are better, where Qwest cleared 100% of CLEC troubles in August within 4 hours, again at parity with comparable retail results. *Id.*, MR-5 (Zone 2). Similarly, the mean time to restore such circuits was 2 hours, 59 minutes in Zone 1 and 1 hour, 52 minutes in Zone 2; both were at parity with retail performance. *Id*. at 88-89, MR-6.

f. *ISDN Capable Loops*

Installation of ISDN Capable Loops. These loops account for approximately 5.5% of all unbundled loops installed in Washington in August. *Id.* at 64, 65, 71, 72, 78, 79, 84, 85, 90, 91, 97, 98, 103, 104, OP-3. In Zone 1, Qwest met 87.65% of its installation commitments in August. Those results were at parity with retail performance. *Id.* at 90, OP-3. In Zone 2, Qwest met 88.24% of its installation commitments in August, also at parity with retail results. *Id.* at 91, OP-3. In both Zones, the average installation interval for CLEC loops continued to be at parity with retail results. *Id.* at 90-91, OP-4. When installation was delayed past the due date, CLEC customers continued to experience installation intervals at parity with retail customers, regardless of whether the delay was due to facility or non-facility reasons. *Id*., OP-6A, OP-6B.

Qwest's installations for CLECs have been of a consistently high quality, continuing to record a trouble-free rate (95.63%) at parity with retail performance. *Id.* at 92, OP-5.

***Repair of ISDN Capable Loops*.** The trouble rate for ISDN loops provisioned to CLECs was 0.64% in August, less than half of the trouble rate in July. The wholesale trouble rate performance was at parity with the retail rate. *Id.* at 96, MR-8.

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Qwest cleared 93.33% of out of service troubles within 24-hours in Zone 1 and 100% in Zone 2 in August. *Id.* at 94-95, MR-3. Qwest also cleared 100% of all CLEC trouble reports within 48-hours in Zone 1 and Zone 2 in August, at parity with retail performance. *Id.*, MR-4.

In August, the mean time to restore was 7 hours, 42 minutes in Zone 1 and 5 hours, 58 minutes in Zone 2. *Id.* at 94-95, MR-6. Both of these results were at parity with retail performance. *Id.*

g. *ADSL Qualified Loops*

Installation of Unbundled ADSL Qualified Loops. In Zone 1, Qwest met 90.91% of its CLEC installation commitments in August, meeting the 90% benchmark for the fourth consecutive month. *Id.* at 97, OP-3. Qwest also met the 6-day installation interval benchmark in Zone 1. *Id.*, OP-4. In Zone 2, Qwest met 95% of CLEC installation commitments, in excess of the 90% benchmark. The average installation interval in Zone 2, however, was 9.5 days above the ROC benchmark. *Id.* at 98, OP-3, OP-4.

When delays occurred, Qwest cleared them in a non-discriminatory fashion. In Zone 1 when Qwest failed to provision the loop on time due to non-facility reasons, the average number of delayed days was at parity with Qwest retail performance. There were no comparable delayed retail installations in Zone 2. *Id.* at 97-98, OP-6A. Neither was there sufficient data to compare Qwest's performance regarding delay days for facilities reasons in either Zone 1 or Zone 2 in August. *Id.* at 97-98, OP-6B.

As to the quality of Qwest's wholesale installations, 86.84% of all ADSL loop installations in August were installed without a trouble report, with only 5 of 38 leading to a trouble report. *Id.* at 99, OP-5.

***Repair of Unbundled ADSL Qualified Loops*.** The trouble rate for such CLEC loops averaged 2.49% in August, at parity with retail performance. *Id*. at 102, MR-8. Qwest also cleared these CLEC troubles expeditiously. In Zone 1 and Zone 2, Qwest cleared 100% of CLEC out of service reports within 24 hours in August and 100% of all troubles within 48 hours; both

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results were at parity with retail performance. *Id.* at 100-101, MR-3, MR-4. The mean time to restore service continued to be at parity with retail performance, and averaged right around 2.5 hours in August. *Id.*, MR-6.

h. Line Sharing

Nearly all line sharing installations for CLECs in August (97%) did not require the dispatch of a technician. *Id.* at 111, OP-3. In that category ("no dispatches"), Qwest met 99.56% of CLEC installation commitments in August, in an average interval of 3.15 days. *Id.* at 112, OP-3, OP-4. Installations with dispatches were excellent as well. For dispatches within MSAs, Qwest met 92.86% of its commitments in an average of 5.57 days. *Id.* at 111, OP-3, OP-4. Installation quality has remained excellent, with 98.27% of newly installed shared loops experiencing no trouble. *Id.* at 113, OP-5.

The vast majority (89.4%) of line sharing repairs did not require a technician dispatch in August. *Id.* at 115-116, MR-4. In August, the overall trouble rate for line sharing was 1.98%. *Id.* at 117, MR-8. Qwest cleared 100% of CLEC out of service reports that did not require a dispatch within 24-hours in August. *Id.* at 116, MR-3. Qwest also cleared 4 of 5 CLEC trouble reports that did require a dispatch within 48-hours in August. *Id.* at 115, MR-4. The mean time to restore was 27 hours, 57 minutes when a dispatch was required and 9 hours, 47 minutes without a dispatch. *Id*. at 115-116, MR-6.

5. Checklist Item No. 5: Unbundled Transport

DS1 UDIT Installation. In August, Qwest continued to provide unbundled transport to CLECs in a nondiscriminatory manner. In Zone 1, Qwest its only CLEC installation commitment in August in 5.5 days. *Id.* at 120, OP-3, OP-4. These results were at parity with retail results. *Id.* Qwest had no Zone 2 orders. *Id.* at 121, OP-3, OP-4. Qwest installed all 3 UDIT facilities without CLECs filing a trouble report in August, at parity with retail performance. *Id.* at 122, OP-5.

DS1 UDIT Repairs. The overall trouble rate for DS1 UDIT facilities continued to be low – 0.66% in August. *Id.* at 125, MR-8. Qwest had only one trouble report in Zone 2 which was

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cleared within 4 hours, at parity to its retail performance. *Id.* at 124, MR-5 (Zone 2). Similarly, the mean time to restore service for CLECs (2 hours, 7 minutes) was at parity with retail performance (2 hours, 34 minutes). *Id.* at 125, MR-6.

Above DS1 Level UDIT Installation. Qwest achieved similar success in the installation of UDITs above DS-1 levels. As to these facilities, Qwest met both commitments statewide in August, at parity with retail performance. *Id.* at 126-127, OP-3. These facilities were installed in 16.4 days in Zone 1 and 8.5 days in Zone 2, again both at parity with retail performance. *Id.* at 126-127, OP-4. In both Zones, in the rare circumstance when delays in provisioning occurred due to non-facility reasons, the length of the delays was at parity with retail delays. *Id.*, OP-6A. There were no delays in either Zones for facilities reasons. *Id.*, OP-6B.

Above DS1 Level UDIT Repairs. In August, the CLEC trouble rate for DS3 UDIT was 4.26%. *Id.* at 131, MR-8. In Zone 1, Qwest cleared 2 of 3 CLEC trouble reports in 4-hours. *Id.* at 130, MR-5 (Zone 1). In Zone 2, Qwest performed even better, clearing 100% of troubles within 4 hours in an average of 1 hour, 8 minutes. *Id*. at 130-131, MR-5 (Zone 2), MR-6. The mean time to restore wholesale and retail service was at parity in August in Zone 2. *Id*. at 131, MR-6.

Dark Fiber. So far, CLECs in Washington have not sought access to dark fiber in significant commercial quantities. The limited performance results demonstrate that Qwest met 100% of CLEC installation commitments (2 of 2) in August. *Id.* at 132, OP-3. The average installation interval was 5 days. *Id.*, OP-4. There were no trouble reports for dark fiber repairs for CLECs in August for the twelfth consecutive month. *Id.* at 133, MR-8.

6. Checklist Item No. 6: Unbundled Switching

To date, CLECs have submitted virtually no requests to Qwest for unbundled local switching on a stand-alone basis. The ROC concluded that no performance measures were needed for stand-alone unbundled switching because there is virtually no demand for it. CLECs obtain access to unbundled switching as part of UNE-P facilities.

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7. Checklist Item No. 7: 911/E911/Directory Assistance/Operator Services

a. *911/E911*

E911 Database Updates. DB-1A, "Time to Update Databases," is a "parity by design" PID because Qwest's E911 database does not distinguish between updates for Qwest or CLECs. In August, Qwest's E911 database was updated in 3 hours 42 minutes, over 1 hour faster than in July. *Id.* at 134, DB-1A.

911/E911 Trunk Installation. Qwest had little data to report for 911/E911 installations in August. In Zone 1, Qwest only provisioned one 911 trunk. *Id.* at 135, OP-3.[21] Installation quality was excellent. In August, Qwest completed 100% of new installations without a CLEC filing a trouble report. *Id.* at 136, OP-5.[22]

911/E911 Trunk Repair. Qwest's maintenance and repair record for 911/E911 trunks is strong. In August, no trouble reports were filed for CLEC trunks. *Id.* at 139, MR-8.

b. *Directory Assistance and Operator Services*

The "Speed of Answer" PIDs for directory assistance and operator services, DA-1 and OS-1, measure the average time required for Qwest's operator and directory assistance personnel to answer calls. These PIDs are also "parity by design" because Qwest's directory assistance and operator services systems handle all calls on a blind, first come, first served basis. In August, the speed of answer for directory assistance was 6.32 seconds (down from 6.94 seconds in July) and 6.93 seconds (down from 8.17 seconds in July) for operator service calls. *Id.* at 140, DA-1, OS-1.

8. Checklist Item No. 8: White Pages Directory Listings

The only PIDs for white pages directory listings are "parity by design" because Qwest processes CLEC end user listings with the same or similar systems, databases, methods, procedures, and personnel used by Qwest for its own retail end user listings. In August, Qwest

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[21] At first blush, the 911 installation interval data looks troublesome. Upon investigation, however, Qwest learned that a technician was improperly coding a customer caused miss as a Qwest miss thereby unnecessarily increasing the intervals. Qwest has conducted additional training with the technician and future months should not contain this problem.

[22] The results reflect the average of the prior and current reporting month. See Qwest's July-June Filing, *Exhibit 3*.

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completed electronically processed updates to the directory listings database in an average of 0.05 seconds, with an accuracy rate of 96.11%. *Id*. at 141, DB-1 C-1, DB-2 C-1.

9. Checklist Item No. 9: Number Administration

Qwest provides nondiscriminatory access to telephone numbers for assignment by CLECs to their customers. In August, Qwest loaded and tested 100% of CLEC NXX codes prior to the LERG effective date or the "revised" effective date. *Id.* at 143, NP-1A. The percentage of NXX code activations delayed for facility reasons was 0.00%. *Id.*, NP-1B.

10. Checklist Item No. 10: Call-Related Databases and Associated Signaling

Qwest offers all CLECs access to, and routing over, its call-related databases and associated signaling in the same manner that Qwest accesses those services. Qwest uses a queuing and routing system that treats all carriers alike.

The sole performance measure for this checklist item is DB-1B, which evaluates the time to update the line identification database ("LIDB"). This is also a parity by design measure. In August, the result under that measure was 3.28 seconds. *Id.* at 144, DB-1B.

11. Checklist Item No. 11: Number Portability

Number portability allows customers to change carriers without changing telephone numbers. In August, Qwest set 96.26% of LNP triggers prior to the scheduled start time for coordinated loop cutovers, exceeding the ROC's 95% benchmark. During the same period, Qwest set 97.45% of LSA triggers prior to the scheduled start time for LNP orders not requiring loop coordination, again beating the 95% benchmark. *Id.* at 145, OP-8B, OP-8C. These results show that Qwest is meeting its requirements for local number portability.

12. Checklist Item No. 12: Local Dialing Parity

Qwest provides dialing parity to competitors in its region. This Commission has already found that Qwest is in full compliance with this checklist item.

13. Checklist Item No. 13: Reciprocal Compensation

Reciprocal compensation is made between carriers for terminating local calls on behalf of

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the other. Qwest's bills were 100% accurate in August, well above the ROC's 95% accuracy benchmark. *Id.* at 146, BI-3B. Qwest's bills were 94.45% complete (its best performance in 6 months) in August, barely missing the 95% benchmark. *Id.*, BI-4B.

14. Checklist Item No. 14: Resale

Qwest continues to provide services for resale in a nondiscriminatory manner. The PIDs for resale measure performance for twelve products -- residential lines, business lines, Centrex, Centrex 21, PBX, Basic ISDN, Qwest DSL, Primary ISDN, DS0, DS1, DS3 and higher, and Frame Relay. The standard for resale performance is parity with retail service. Given the small volumes for some of these services, Qwest will focus its discussion once again on residential POTS, business POTS, Centrex and Centrex 21 services, which combined represented 99.2% of the total installations in August in Washington. *Id.* at 147-149, 157-159, 167-169, 177-179, 187-189, 199-201, 211-214, 219-221, 227-229, 237, 242-243, 248-249, OP-3.

Installation. Qwest provisioned 59.8% of all resold orders without requiring as technician dispatch in August. *Id.* In August, Qwest met 99.79% of its CLEC non-dispatched residential POTS installation commitments in an average of 2.75 days. *Id*. at 149, OP-3, OP-4. Qwest met 98.31% of its CLEC non-dispatched business POTS installation commitments in an average of 2.42 days. *Id*. at 159, OP-3, OP-4. Qwest met 100% of its CLEC non-dispatched Centrex and Centrex 21 installation commitments in an average of 3.63 days for Centrex and 3.8 days for Centrex 21. *Id*. at 169, 179, OP-3, OP-4. This performance is outstanding; nonetheless, in August, Qwest's average provisioning intervals not involving a dispatch were statistically longer for CLECs than for comparable Qwest retail installation intervals, for three of the four products (Residence 2.26 days, Business 2.02 days, and Centrex 2.38 days). This is an instance when this Commission should follow the FCC's guidance, look behind the statistics, and find that Qwest meets its objectives. In all categories of service, whether dispatched or not, Qwest met 98.89% of its commitments. *Id.* at 147-149, 157-159, 167-169, 177-179, 187-189, 211-214, OP-3. Surely the CLECs can compete and compete effectively with this type of installation performance by

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Qwest's performance in provisioning these resold services was equally outstanding when a dispatch is required. In August, for dispatches within MSAs: for residential POTS Qwest met 98.9% of its CLEC installation commitments in an average of 3.08 days; for business POTS Qwest met 97.94% of its CLEC installation commitments in an average of 4.26 days; for Centrex Qwest met 94.83% of its CLEC installation commitments in an average of 4.03 days; and for Centrex 21 Qwest met 100% of its CLEC installation commitments in an average of 8.5 days. *Id.* at 147, 157, 167, 177, OP-3, OP-4. 6 of these 8 performance measures were at parity with retail performance. *Id.* All 6 measures at parity were for residence, business and Centrex 21, which represented 86.6% of the dispatched installations within MSAs. *Id.* at 147, 157, 167, 177, OP-3. While Centrex installation commitments and associated interval results were not at parity with retail performance, only 3 Centrex installation commitments were missed out of 78 orders. *Id.* at 167-168, OP-3, OP-4. One order was delayed 2 days and the other two orders were delayed on average 2.5 days. *Id.* at 167, OP-6A, OP-6B.

As to dispatches outside of MSAs, Qwest met 95.83% of its CLEC residence installation commitments and 100% of its business installation commitments. *Id*. at 148, 158, OP-3. There were no Centrex or Centrex 21 installation commitments outside the MSA in August. *Id*. at 148, 158, OP-3, OP-4. The commitments met and average intervals for these residential and business POTS were at parity with equivalent retail service. *Id.* at 148, 158, OP-3, OP-4. 9 of 10 residence installation measures for which there is data were at parity with retail performance. *Id.* at 147-150, OP-3, OP-4, OP-6A, OP-6B, OP-5, OP-15A. These orders represent roughly 66% of the total resold orders installed in August in Washington. *Id.* at 147-149, 157-159, 167-169, 177-179, 187-189, 199-201, 211-214, 219-221, 227-229, 237, 242-243, 248-249, OP-3. The only residential metric not at parity was the installation interval for non-dispatched orders. The CLEC interval was an average of 2.75 days and the comparable retail result was an average of 2.26 days. *Id.* at 149, OP-4. 5 of 8 business installation measures for which there is data were at parity with

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retail performance. *Id*. at 157-160, OP-3, OP-4, OP-6A, OP-6B, and OP-15A. These orders represent roughly 25% of the total resold orders received in August in Washington. *Id.* at 147-149, 157-159, 167-169, 177-179, 187-189, 199-201, 211-214, 219-221, 227-229, 237, 242-243, 248-249, OP-3. Two of the results not at parity with retail performance were the installation interval (CLEC orders 2.42 days; retail orders 2.02 days) and commitments met (where only 3 of 178 CLEC installation commitments were not met) for non-dispatched orders. *Id.* at 159, OP-3, OP-4. The last measure not at parity (OP-5) showed the quality of new CLEC installations was 82.22%, while the comparable retail result was 87.29%. *Id*. at 160, OP-5.

Maintenance and Repair. In August, the overall trouble rate for resold CLEC lines was extremely small: 1.71% for residential POTS; 0.97% for business POTS; 0.65% for Centrex; and 1.11% for Centrex 21. *Id*. at 155, 165, 175, 185, MR-8. Only Centrex 21 had a statistically significant disparity in August between wholesale and retail performance (1.11% for CLECs and 0.72% for retail Centrex 21 customers). Centrex 21 trouble reports represent only about 3% of the total trouble reports received. *Id.* at 152-155, 162-165, 172-175, 182-185, 194-197, 206-209, 216-218, 225-226, 234-235, 240-241, 246-247, 252-253, MR-4, MR-5. This is another example of when the Commission should look behind the statistics to see the outstanding performance provided to CLEC by Qwest. A one percent trouble rate is outstanding in every circumstance.

Repairs of all four primary resold products are measured by the number of out of service troubles cleared in 24-hours and the number of troubles cleared in 48-hours. Qwest also measures the mean time to restore. All three of these metrics are tracked for dispatches within MSAs, dispatches outside of MSAs and those not requiring a dispatch; therefore, there are 9 primary repair measures per type of resold service. For resold residential POTS service in August, Qwest cleared 92.98% of all out of service situations statewide in 24-hours and all 17 residence repair metrics were at parity with retail service. *Id*. at 152-156, MR-3, MR-4, MR-6, MR-7, MR-8, MR-9, MR-10.

For resold business POTS service in August, Qwest cleared 95.24% of all out of service

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situations in 24-hours and 98.5% in 48 hours. 15 of 17 business repair metrics were at parity with retail service. *Id*. at 162-166, MR-3, MR-4, MR-6, MR-7, MR-8, MR-9, MR-10. All troubles cleared within 48 hours, where no dispatch was involved, was 98.32% for CLECs and 99.55% for comparable retail customers. 2 of 119 CLEC trouble reports and 6 of 1,336 retail trouble reports were not cleared in 48 hours. *Id*. at 164, MR-4. The repeat report rate for business trouble reports, with dispatches outside MSAs, was higher to a statistically significant degree for CLECs than for comparable retail customers. *Id*. at 164, MR-7. 5 of 126 total business repair reports led to repeats; this was not at parity with retail performance (although the result was only barely statistically significant). *Id*. at 162-166, MR-3, MR-7.

For resold Centrex service in August, Qwest cleared 97.03% of all out of service situations in 24 hours. 16 of 17 Centrex repair metrics were at parity with retail service, with only a lack of parity on MR-10 (Customer and Non-Qwest Related Trouble Reports). *Id*. at 172-175, MR-3, MR-4, MR-6, MR-7, MR-8, MR-9. Finally, for resold Centrex 21 service in August, Qwest cleared at least 100% of all out of service situations in 24 hours and 11 of the 12 repair metrics for which there was data were at parity with retail service. *Id*. at 182-186, MR-3, MR-4, MR-6, MR-7, MR-9, MR-10. The one Centrex 21 measure not at parity was the trouble rate, which was 1.11% for CLECs and 0.72% for comparable retail customers. *Id.* at 185, MR-8.

Thus, Qwest met or exceeded performance expectations for 59 of the 63 key repair metrics around the 4 key resold products. Qwest is clearly meeting its repair obligations around Checklist Item 14.

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II. CONCLUSION

The attached performance data shows that in August 2001, Qwest continued its outstanding performance for CLECs across all checklist items. Qwest is offering CLECs a meaningful opportunity to compete in the marketplace in Washington today.

Respectfully submitted this ____day of October, 2001.

QWEST

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