

1 with each of the changes, and then setting the target
2 implementation dates for each of those changes. And
3 those were provided through -- the majority were
4 provided on May 22nd, which was the date of the May CMP
5 meeting. At that time there were -- three of the CRs
6 were -- analysis was still underway.

7 And, so, there were three, and I
8 apologize. I can't remember, from memory -- tell you
9 which three that did not receive the target
10 implementation date until the early July time frame. I
11 believe it was on July 9th.

12 Q So, my question is, under the CMP
13 process, if it's not a regulatory mandated change, you
14 unilaterally, meaning Qwest alone, interpreted what the
15 target implementation date would be for changes 0I1G
16 through 08 found on page 14 of your testimony?

17 A Yes. Unilaterally placed on the level of
18 complexity and other technical reliance that we have,
19 we do set those dates.

20 Q Okay. Now, are you aware, in the CMP
21 process, if any CLEC opposed these particular changes
22 found on page 15 -- or 14 of your August 15th, 2003
23 testimony?

24 A AT&T did submit, in early June, a request
25 for escalation.

1 Q Ms. Huff, I'm going to ask, under the
2 current CMP process, what would happen if Qwest did not
3 meet the targeted implementation dates found on page 14
4 of your testimony?

5 A There are no specific limits outlined in
6 the CMP process document for failing to meet a date.
7 This was based on extensive collaboration and
8 discussion between Qwest and a number of the CLECs, was
9 then also approved by the CLECs, AT&T being one of the
10 CLECs that voted "yes" to accept the redesigned
11 document. There's a -- I'm not sure if it's on page 24
12 or 50 of the document, which I don't think I have in
13 front of me, but there's some language in the CMP
14 document that recognizes that the system enhancements
15 are subject to, sometimes, to difficulties, and dates
16 may need to change due to complexities, et cetera.

17 However, I would also point out that we
18 did an analysis of the CRs that had been implemented
19 between August 1st, 2002 and August 1st, 2003. And in
20 that time frame, Qwest implemented 63 CRs. Of those,
21 60 were implemented on or before the due date. One was
22 implemented within a week of the targeted due date and
23 two did miss the due date by approximately two months.

24 Q Okay. You indicated that the redesign --
25 the CMP redesign system was a collaborative effort,

1 Q Uh-hum.

2 A On several of the items. And, again,
3 looking at that table, the items that showed in Column
4 1, the word, "Escalated," indicates which of those AT&T
5 asked us to improve the dates. The request, as I said,
6 came in in early June, and requested that all of those
7 be implemented in the August 2003 time frame. Qwest
8 responded, I want to say, around the 18th of June, but
9 it was the last half of June, that it was not
10 technically feasible to implement those six CRs by
11 August 2003.

12 Q Okay. Did any, looking at page 14 -- and
13 when I refer to page 14, we're always talking about
14 your August 15th, 2003 testimony.

15 A Uh-hum.

16 Q Looking at page 15, did any CLEC, in any
17 of these CRs, indicate that it didn't want those
18 changes made to the CABS billing system?

19 A Not to my knowledge.

20 Q And do you -- would you be aware if that
21 occurred?

22 A I believe I would have heard, yes.

23 Q Okay. And under the CMP process, aren't
24 the CLECs, by this time, by today, which is January --
25 I'm sorry, September 29th, 2003, you would have a -- a

1 CLEC would have the ability to, through the CMP process
2 to oppose, in writing, a -- any objections that they
3 have to any of the CMP changes, right?

4 A Correct. No other CLEC has attempted to
5 escalate these dates.

6 Q Well, not only escalate these dates, but,
7 for example, if the CLEC didn't want a population of
8 the CABS service established dates, would -- the date
9 on which service was established, which is No. 5 on
10 page 14.

11 A Uh-huh.

12 Q They could, because they are not
13 necessarily AT&T, they could oppose it and say we don't
14 want that. We don't want that change made, correct?

15 A They would come into the CMP meeting and
16 express concern when the CRs are being discussed.

17 Q Okay. And in looking at page 14, has any
18 CLEC opposed any of the changes being discussed?

19 A Not to my knowledge.

20 Q And with your understanding of CMP, they
21 would have had the ability, by now, to do so?

22 A Yes.

23 Q Now, Qwest's CABS-formatted invoice
24 currently populates the activity date with the current
25 billed date; is that correct?