BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of Qwest Corporation to Initiate a Mass-Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order	Docket No. UT-033044 QWEST'S BATCH HOT CUT PROPOSAL

Pursuant to the Commission's November 3, 2003 Notice of Endorsement of Proposed Regional Batch Hot Cut Forum, Qwest Corporation ("Qwest") respectfully submits this proposal for a region-wide batch loop conversion process. Qwest proposes a single, centrally coordinated ordering and conversion process that would be used in all fourteen of its states whenever a CLEC has the requisite number of qualified lines to convert from Qwest's circuit switch (both Qwest retail and CLEC UNE-P lines) to the CLEC's circuit switch. The same process could also be used to convert lines from one CLEC's circuit switch to another's to the extent that sufficient volumes existed to justify use of the batch process.

Qwest's proposal builds on, and makes improvements to, a process for provisioning unbundled loops that already operates at a demonstrably high level of performance. As discussed below, Qwest's current process does not suffer from many of the cost and operational problems that the *Triennial Review Order*[1] identified; Qwest does not have problems with excessive provisioning

[1] Report and Order, *Review of the Section 251 Unbundling Obligation of Incumbent Local Exchange Carriers*, CC Dkt. No. 01-338, FCC 03-36 (rel. Aug. 21, 2003) ("*Triennial Review Order*" or "*TRO*").

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

delays or service outages;[2] and, Qwest does not levy huge non-recurring charges to perform a hot cut.[3] Moreover, unlike some other incumbent LECs,[4] Qwest actually does have substantial experience migrating large batches of CLEC lines — including thousands in 2003 for one CLEC alone — from UNE-P to stand-alone unbundled loops on a project-managed basis. These batch conversions *are* reflected in Qwest's current performance data, and establish that Qwest has continued to provide these loops to the CLEC at an extraordinarily high level of quality.

Even with this strong performance, in the two and a half months since the *Triennial Review Order*'s release, Qwest has worked hard to improve this process even further. Qwest has re-examined every step of its current loop-conversion process to find the efficiencies that become available when a CLEC works with Qwest to convert twenty-five lines or more in a single batch. Qwest has also used its experience performing large-scale project-managed conversions to identify the steps that can be streamlined or eliminated when the carriers are migrating batches of in-service loops. Qwest's work has paid off: The batch conversion process that Qwest proposes reduces substantially the work times associated with some of the steps within the process, the number of times Qwest has to contact the CLEC, and the process of clearing the order once the work has been completed. While Qwest has not yet completed its detailed cost studies, it appears that in virtually every instance these efficiencies will reduce Qwest's cost of performing a batch hot cut.

Qwest first provides a brief background summarizing the FCC's instructions to the state commissions concerning adoption of a new batch conversion process, as well as the loop-conversion process that Qwest is currently using. Qwest then presents its proposal for a new batch process.

I. BACKGROUND

A. The *Triennial Review Order* and the FCC's Implementing Rules

In the *Triennial Review Order*, the FCC determined that "in the large majority of locations"

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[2] Compare *TRO* ¶ 466 with *infra* at section I(B) (discussion of Qwest provisioning and outage data).

[3] Compare *TRO* ¶ 470 with *infra* at section II(D) (discussion of Qwest's current NRCs).

[4] *See* TRO ¶ 474 & n.1466 (finding that Verizon's procedures for performing project-managed migrations "not sufficiently developed" and noting Verizon's failure to provide any performance data reflecting these project-managed cuts).

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

(though not all),[5] the incumbent LECs' existing processes for migrating in-service loops one at a time from their own switches to their competitors' would "serve as barriers to competitive entry in the absence of unbundled switching" for mass-market customers.[6] The FCC found that the incumbents' current one-at-a-time conversions, as a general matter, imposed non-trivial one-time costs and service disruption risks on CLECs, and it questioned whether these processes would be able "to handle the necessary volume of migrations" if mass-market switching is taken off the unbundling list.[7] The FCC did note that some incumbents had begun to perform larger numbers of loop migrations on a project-managed basis, and that "[t]he record evidence strongly suggests" that managing and performing cut-overs on a batch basis in this manner could yield significant improvements. But based on the specific record before it, the FCC concluded that these project-managed processes were not yet "sufficiently developed or widespread enough to adequately address the impairment created by the loop cut over process."[8]

The FCC acknowledged that the evidence before it was "not sufficiently detailed" to permit it to evaluate whether these general observations held true for any carrier's particular hot cut process in any individual market,[9] and that states might well find in some markets that "existing hot cut practices would be adequate even in the absence of unbundled local circuit switching."[10] But for all other markets, the FCC directed the states to "approve, within nine months of the effective date of this Order, a batch cut migration process . . . that will address the costs and timeliness of the hot cut process."[11] The FCC's formal rules implementing the *Triennial Review Order* define a "batch cut process" as "a process by which the incumbent LEC simultaneously migrates two or more loops from one carrier's local circuit switch to another carrier's local circuit switch, giving rise to

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5 *TRO* ¶ 473.

6 *TRO* ¶ 460.

7 *TRO* ¶ 459.

8 *TRO* ¶ 474.

9 *TRO* ¶ 473.

10 *TRO* ¶ 490.

11 *TRO* ¶ 488.

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

operational and economic efficiencies not available when migrating loops . . . on a line-by-line basis."[12] The FCC held that the efficiencies that become available when migrating loops in batches rather than singly would mitigate the economic and operational burdens on which the FCC's presumptive national finding of impairment for mass-market switching was based: "We conclude that the loop access barriers contained in the record may be mitigated through the creation of a batch cut process by spreading loop migration costs over a large number of lines, decreasing per-line cut over costs."[13]

The FCC rules implementing the *Order* direct state commissions to make four determinations with respect to the new batch conversion process (beyond determining whether any new process is required in a given market at all[14]):

> (1) A state commission shall first determine the appropriate volume of loops that should be included in the "batch."
>
> (2) A state commission shall adopt specific processes to be employed when performing a batch cut, taking into account the incumbent LEC's particular network design and cut over practices.
>
> (3) A state commission shall evaluate whether the incumbent LEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the incumbent LEC for any requesting telecommunications carrier in a timely manner, and may require that incumbent LECs comply with an average completion interval metric for provision of high volumes of loops.
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> (4) A state commission shall adopt rates for the batch cut activities it approves in accordance with the Commission's pricing rules for unbundled network elements. These rates shall reflect the efficiencies associated with batched migration of loops to a requesting telecommunications carrier's switch, either through a reduced per-line rate or through volume discounts as appropriate.[15]

The paragraphs of the *Order* giving state commissions specific instructions for the nine-month cases

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[12] 47 C.F.R. § 51.319(d)(2)(ii).

[13] *TRO* ¶ 487.

[14] 47 C.F.R. § 51.319(d)(2)(B) provides, "If a state commission concludes that the absence of a batch cut migration process is not impairing requesting telecommunications carriers' ability to serve end users using DS0 loops in the mass market without access to local circuit switching on an unbundled basis, that conclusion will render the creation of such a process unnecessary." The rule specifies the findings that a state must make if it chooses not to require adoption of a new batch process. *See also TRO* ¶ 490.

[15] 47 C.F.R. § 51.319(d)(ii)(A)(1)-(4).

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

contain these same directives.[16]

B. Qwest's Current Hot Cut Process

As just noted, in considering any new batch conversion process, a state commission must "tak[e] into account the incumbent LEC's particular network design and cut over practices."[17] Qwest has already spent considerable time and effort to develop a seamless process for provisioning large quantities of unbundled loops for CLECs at an extremely high level of quality, and to develop TELRIC-compliant rates for that process. The state commissions and the FCC examined Qwest's existing hot cut process at length in the section 271 proceedings and found it adequate. Rather than redescribing the entire process in this document, Qwest attaches the affidavit of William M. Campbell, filed before the FCC in the recent Arizona section 271 docket, which outlines Qwest's current hot cut process. ***See* Exhibit 1.** To highlight:

- Qwest uses, and must continue to use, the same hot cut process in all fourteen of its states.
- Qwest has a dedicated center in Omaha, Nebraska – the QCCC – that oversees the provision of each and every hot cut throughout the Qwest region.
- Qwest has a detailed procedure that defines the hot cut process. ***See* Exhibit 2.**
- Qwest has trained its technicians on the hot cut process.
- Qwest has provisioned unbundled loops for CLECs using this process at an extremely high level of quality. Qwest's audited and reconciled performance data shows that it is routinely provisioning over 98% of its hot cut commitments across the region on time. ***See* Exhibit 3.** This percentage varies in individual states, but in general remains within the 95-98% performance level. ***See* Exhibit 4.** Moreover, only a small fraction of migrated loops experience any trouble in the 30 days following cut-over. Regionally, for example 97.5%-99.99% of loops do not experience installation troubles. ***See* Exhibits 3-4.**

Qwest uses its current process to provision approximately 1,000 hot cuts per day on average, and has processed up to 1,350 hot cuts in a single day. Importantly, these numbers reflect CLECs' actual order levels, not the maximum number of hot cuts Qwest could perform in a single day.

Qwest has experience working with CLECs to transition very large batches of UNE-P lines

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[16] *See TRO* ¶ 489.

[17] 47 C.F.R. § 51.319(d)(ii)(A)(2).

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

to stand-alone unbundled loops simultaneously. Qwest has already worked with one CLEC to migrate thousands of UNE-P lines to the CLEC's own switching using its current form of "batch processing." These numbers continue to mount. Unlike some other LECs whom the FCC specifically considered in the *Triennial Review Order*,[18] Qwest includes the results of this large-scale batch conversion process in its performance data. Thus, the extremely good performance results noted above reflect Qwest's ability to perform hot cuts for its CLEC customers in larger quantities. ***See* Exhibits 3-4.** The batch conversion process that Qwest proposes in this forum reflects Qwest's actual experience with these types of large-scale cuts and the lessons it has learned regarding what does and does not work.

II. QWEST'S BATCH LOOP CONVERSION PROPOSAL

Qwest presents its proposal for a new batch hot-cut process in terms of the four determinations the FCC instructed state commissions to make.

A. The Minimum "Batch" That Qualifies for the Batch Conversion Process (47 C.F.R. § 51.319(d)(ii)(A)(1))

As noted above, the very point of adopting a *batch* hot cut process is to capture the operational and economic efficiencies that come from migrating many in-service loops simultaneously rather than singly. The FCC directed the states to consider batch conversions specifically because it "expect[ed] these processes to result in efficiencies associated with performing tasks once for multiple lines that would otherwise have been performed on a line-by-line basis,"[19] and it is the ability to "spread loop migration costs over a large number of lines, decreasing per-line cut over costs" that enables "the loop access barriers contained in the record [to] be mitigated."[20] But these per-loop costs drop only if the CLEC converting a high enough quantity of loops to give rise to economies and justify the slightly greater up-front coordination that batch conversions require. The CLEC must also

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[18] The FCC noted that Verizon's project-managed large-batch hot cuts were not offered at set rates, were not subject to any performance intervals, and, as a result, were not tracked by Verizon's performance metrics. *See TRO* ¶ 474 & n.1466.

[19] *TRO* ¶ 489.

[20] *TRO* ¶ 487.

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

be seeking to convert loops of a kind that actually permit conversion tasks to be consolidated; otherwise, there are no efficiencies to pass through.

For these reasons, the first task the FCC assigned the states was to determine what minimum "batch" of loops a CLEC must be converting in order to qualify for "batch" conversion. *See* 47 C.F.R. § 51.319(d)(ii)(A)(1); *TRO* ¶ 489. (This is a separate question from the maximum volumes of loops the batch conversion process must be prepared to handle, which is discussed in part C below). Qwest's preliminary determination is that the necessary economies and efficiencies may be realized when a CLEC is converting twenty-five (25) voice grade lines at a single time in a single central office. The reason why CLECs need at least twenty-five (25) lines *individually* is that some of the significant efficiencies — for example the ability to reduce the number of separate calls between Qwest and the CLEC, and the ability to perform multiple pre-wirings in the same physical locations on the frame — come from performing multiple conversions *for the same CLEC*, not just from doing multiple conversions *per se*.[21]

In addition, batched loops must all be capable of conversion on a consolidated basis. The FCC adopted its batch conversion requirement to assist CLECs in serving the "mass market," which the FCC defined as "consumers of analog 'plain old telephone service' or 'POTS' that purchase only a limited number of POTS lines and can only economically be served via analog DS0 loops."[22] A batch conversion process is possible for these analog DS0 loops, which constitute the vast majority of Qwest's outside plant. But it is not feasible to gain these efficiencies when the underlying facility uses integrated digital loop carrier systems ("IDLC"). The *Triennial Review Order* itself recognizes[23] that IDLC is not unbundled via the same, uniform cut-over process as other loop plant: Each IDLC loop must be examined individually to determine which of the several unbundling

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[21] *Cf. TRO* ¶ 489 (FCC expects efficiencies to come from consolidating pre-wiring and reducing number of communications between ILEC and CLEC).

[22] *TRO* ¶ 459.

[23] *See TRO* ¶ 297 (noting that unbundling IDLC loops "may require incumbent LECs to implement policies, practices, and procedures different from those used" to unbundle other kinds of loops); *id*. n.855 (describing a number of different ways that IDLC loops might be unbundled).

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

methods used for such loops (such as finding a metallic pair alternative, hair-pinning, reconnecting the loop to a universal DLC system at the remote terminal, or installing a new central-office terminal) is available or appropriate for that loop. Qwest emphasizes that it will continue to unbundle IDLC lines at a very high level of quality; however, such loops (which form the small percentage of Qwest's plant in any event) must be migrated individually using the existing hot cut process.[24] ***See Exhibit 5.***

Likewise, the FCC expressly defined its batch-cut requirements in terms of developing a process to migrate loops "from one carrier's local circuit switch to another carrier's *local circuit switch*."[25] The FCC's definition of a "batch cut process" thus does not include conversions including loop-splitting arrangements that also connect an unbundled loop to a third carrier's *packet* switch. As the Arizona Corporation Commission has properly recognized,[26] the FCC directed carriers to pursue line-splitting implementation, not as part of the nine-month switching cases or the development of a batch conversion process, but rather as part of the pre-existing change management process.[27] The FCC's decision *not* to include loop splits as part of the batch conversion process makes sense: conversions from UNE-P directly to loop-splitting arrangements cannot be consolidated into a batch because each loop must be individually checked to ensure it is capable of carrying DSL signals and, if not, conditioned. Just as contemplated by the *Triennial Review Order*, the voice CLEC in a potential line-splitting arrangement will be able to use Qwest's *current* processes to migrate individual lines to stand-alone unbundled loops connected to that CLEC's circuit switch.[28]

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[24] *See TRO* ¶¶ 251-252

[25] 47 C.F.R. § 51.319(d)(ii) (defining "batch cut process") (emphasis added). *See also* 47 C.F.R. § 51.319(d)(ii)(A) (directing state commissions to establish process "for use in migrating lines served by one carrier's local circuit switch to lines served by another carrier's *local circuit switch*) (emphasis added).

[26] *See* Arizona Corporation Commission, Procedural Order, *ILEC Unbundling Obligations As a Result of the Federal Triennial Review Order*, Dkt. No. T-00000A-03-0369 (Nov. 6, 2003) at 5-6 ("[T]he FCC's Triennial Review Order did not require line splitting to be addressed in the nine-month docket and . . . no party could point to another state commission that is addressing line splitting in its triennial review proceedings."); *id*. at 7 ("IT IS FURTHER ORDERED that line splitting will not be addressed in this docket.").

[27] *See TRO* ¶ 252 ("[W]e encourage incumbent LECs and competitors to use existing state commission collaboratives and change management processes to address OSS modifications that are necessary to support line splitting.").

[28] *TRO* ¶¶ 251-252.

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

B. The Process Employed (47 C.F.R. § 51.319(d)(2)(ii)(A)(2))

The FCC's second instruction to the states is to "adopt specific processes to be employed when performing a batch cut, taking into account the incumbent LEC's particular network design and cut over practices."[29] Compared to the loop conversion process that Qwest uses today, the new batch hot cut process eliminates many of the repetitive dial tone testing steps, much of the telephonic contact between the two companies, and the need for duplicative entries into Qwest systems in order to update records. The new process also has new business rules associated with it on both Qwest's and the CLEC's part. Each is intended to make the work steps within the new process more efficient and workable for both parties.

1. Process flow

Exhibit 6 is a process diagram describing the recommended tasks for the new batch hot cut process. As illustrated in this diagram, a CLEC will perform pre-order functions including an initial batch coordination meeting with Qwest. CLEC must submit to Qwest a Local Service Request ("LSR") with a Purchase Order Number ("PON") and a three-letter unique identifier *e.g.*, ("BHC") to designate it as a batch hot cut candidate in order to begin the batch conversion. Once a complete and accurate LSR is received, a service order will be generated resulting in a firm order confirmation ("FOC") back to the CLEC. Once the service order is issued, a Qwest project manager, residing in the QCCC, will begin compiling the batch orders on a Central Office ("CO") by CO basis.

Approximately two days prior to due date for the batch, a spreadsheet containing all loops in the batch will be forwarded to both the CLEC and the central office where the work will take place. This batch spreadsheet will contain order related information such as the CLEC Purchase Order Number PON with a three-letter unique identifier BHC describing it as a batch hot cut candidate; the Qwest order number; a Qwest project ID number; and CLEC contact information.

On the due date, the Central Office Technician ("COT") will perform both the pre-wiring and lift and lay activity associated with the conversion order. Prior to performing the lift and lay,

[29] 47 C.F.R. § 51.319(d)(2)(ii)(A)(2). *See also TRO* ¶ 489.

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

however, the COT will perform a dial tone test on both the Qwest switch port and the CLEC's facility to verify the existence of dial tone on each facility, and that each facility has the correct number working on it. These tasks will occur before any conversion is conducted. If the COT does not have dial tone on the CLEC's facility on the due date, the QCCC will contact the CLEC via a phone call asking the CLEC to resolve the issue. If CLEC dial tone is present, the COT will monitor the line to ensure an idle state prior to disconnecting the Qwest circuit switch and then reconnecting it to the CLEC's switch. Upon completion of the orders identified on the batch spreadsheet, Qwest will notify the CLEC via e-mail that it has completed the conversions. It remains the responsibility of the CLEC to ensure that each line is triggered for number porting upon completion of the order.

2. Batch Hot Cut Requirements

Exhibit 7 contains a list of the draft requirements that both Qwest and the CLECs must follow in order to make the conversion process as seamless and efficient as possible. A summary of the most significant of these requirements is as follows:

a) General requirements

The batch hot cut process is applicable to basic installations that will re-use existing facilities; this will avoid the need to dispatch a Qwest technician to the field to change outside plant facilities. Other installation options will remain available during normal business hours to provision other types of unbundled loops. For example, UNE-P loops working on Integrated Digital Loop Carrier systems, or line splitting arrangements will be converted during normal business hours using existing processes because a field dispatch may be required to complete the conversion.

b) Qwest-specific requirements

Qwest will produce and distribute via e-mail a batch spreadsheet for the CLEC documenting all order activity within a given central office, and use this batch spreadsheet to communicate with the CLEC on order status and completion. Unlike the QCCC's current process, to maximize efficiency Qwest will conduct pre-wire work on the due date, not two days earlier, to minimize the number of instances technicians must work on each order.

c) CLEC-specific requirements

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

The CLEC must provide both email and live contact information on the LSR when it is submitted. The CLEC must provide accurate end-user service address information. The CLEC dial tone must be on their designated CFA termination prior to the due date. The CLEC must make resources readily available to clear all loops identified on the batch spreadsheet in a timely manner between the hours of 3:00PM CST and 11:00PM CST. This will ensure that the CLEC and Qwest can promptly resolve any issues the COT may encounter (*i.e.*, bad CFA or no dial tone).

C. The Capacity and Timeliness of the Batch Process (47 C.F.R. § 51.319(d)(2)(ii)(A)(3))

The FCC's third instruction to state commissions is to "evaluate whether the incumbent LEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the incumbent LEC for any requesting telecommunications carrier in a timely manner . . . ."[30] This requires state commissions to make predictive judgments regarding the volumes of conversions the batch cut process must be able to handle and whether Qwest can continue to provision loops at an acceptable level of quality at those volumes.

The expected volume of conversions turns on five factors: (1) current volumes of stand-alone unbundled loop provisioning, (2) current volumes of new UNE-P orders, (3) the size of the embedded UNE-P base, (4) the fraction of that base and new UNE-P orders that will convert to stand-alone unbundled loops, and (5) the *Triennial Review Order*'s schedule for transitioning the embedded UNE-P base to other arrangements. Qwest addresses each factor in turn. The volumes of UNE-P and UNE-L lines CLECs submit monthly are well established in Qwest's performance data. The only unknown is the percentage of UNE-P lines (new and existing) that will convert once switching is no longer available as a UNE.

The FCC set a transition schedule for moving the embedded base of UNE-P lines to unbundled loops. CLECs must submit 1/3 of their embedded UNE-P lines for conversion 13 months after the state commission decision; 1/3 of their UNE-P lines 20 months after the state

[30] 47 C.F.R. § 51.319(d)(2)(ii)(A)(3). *See also TRO* ¶ 489.

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

commission decision; and the last 1/3 of their UNE-P lines 27 months after the state commission decision.[31] Assuming a July 2, 2004 decision from the state commission, that means 1/3 of the embedded base will convert between August 2005 and February 2006; 1/3 of the embedded base will convert between March 2006 and September 2006, and the remainder will convert before April 2007.[32] The FCC also stated that state commission decisions eliminating unbundled switching as a UNE will become effective on December 2, 2004.[33]

Thus, to calculate the expected monthly volumes in each state, the state commissions should apply the following formulas based on the volumes of UNE-P lines and UNE-L lines in each individual state:

- December 2004 – July 2005: [Inward unbundled loop volume (growth) eligible for the batch hot cut process * percent of UNE-P lines in markets where Qwest is challenging the impairment finding]
- August 2005 – April 2007: [Inward unbundled loop volume (growth) eligible for the batch hot cut process * percent of UNE-P lines in markets where Qwest is challenging the impairment finding] + [Embedded UNE-P base amortized over 21 months * percent of UNE-P lines in markets where Qwest is challenging the impairment finding]

These formulas will provide the expected volumes of unbundled loops that Qwest's must be prepared to provision in each state on a monthly basis.

D. Batch Cut Rates (47 C.F.R. § 51.319(d)(2)(ii)(A)(4))

The FCC's last directive to each state commission is to "adopt rates for the batch cut activities it approves in accordance with the Commission's pricing rules for unbundled network elements," which should "reflect the efficiencies associated with batched migration . . . ." [34] The final rate will obviously depend on the precise procedure adopted in this forum.

As an initial matter, Qwest notes it is starting from a better position than many other incumbent LECs in this regard. The FCC found in the *Triennial Review Order* that currently hot

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31 47 C.F.R. §51.319(d)(4)(A).

32 *TRO* ¶ 532.

33 47 C.F.R. §51.319(d)(4).

34 47 C.F.R. § 51.319(d)(2)(ii)(A)(4). *See also TRO* ¶ 489.

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

cuts are "*often* priced at rates that prohibit facilities based competition for the mass market,"[35] citing ILEC non-recurring charges exceeding $100 and as high as $185.[36] But Qwest's hot cut charges across its region are not nearly this high. In virtually every state Qwest's current non-recurring charges for a basic hot cut range between $29.10 and $65.00.[37]

The batch conversion process that Qwest proposes above will yield significant additional efficiencies and in most states the CLEC community can expect to experience a significantly reduced rate.

III. CONCLUSION

Qwest hereby presents a viable batch hot cut proposal that will allow CLECs to convert large volumes of DS0 lines to unbundled analog loops, while still ensuring that CLEC end-user customers have minimal service interruption, and minimal installation service problems. In most states, the process will also significantly reduce the non-recurring rate associated with provisioning an individual unbundled loop. Qwest has already demonstrated that the CLEC community can use its existing hot cut process to reach mass-market customers at a high level of quality. This simplified process should do nothing but improve an already strong process. Qwest asks the Commission to approve its proposed process.

RESPECTFULLY SUBMITTED this _____ day of November, 2003.

QWEST

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Lisa Anderl, WSBA # 13236
Adam Sherr, WSBA # 25291
Qwest
1600 7th Avenue, Room 3206
Seattle, WA 98191

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[35] *TRO* ¶ 465 (emphasis added).

[36] *TRO* ¶ 470.

[37] In two states, Idaho and Minnesota, the nonrecurring rates associated with hot cuts are substantially below this range. In these states, these costs are well below the cost of providing the service even with the new batch hot cut process. As such, Qwest does not set forth these rates as an example.

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040

Phone: (206) 398-2500
Attorneys for Qwest

Qwest
1600 7th Ave., Suite 3206
Seattle, WA 98191
Telephone: (206) 398-2500
Facsimile: (206) 343-4040