

Liberty Data Request Set 20-001:

Please provide an assessment of any operational or procedural considerations that could cause differences in the results of the data reconciliation in Arizona compared to any of the other states that are included in Liberty's data reconciliation scope. Consider the performance measures to be analyzed in Arizona compared to those that are to be reviewed in other states. Consider matters such as sub-regional service order processors and training centers. Consider the results of other parties' assessments of such matters such as the KPMG Regional Differences report. Please take into account any data reconciliation work that Qwest and any CLEC may have undertaken in addition to the work assigned to Liberty. Finally, please take into consideration and summarize any claims or testimony by CLECs or other parties in states other than Arizona.

QWEST Response:

### **Introduction**

As an initial matter, the CLECs have requested reconciliation of the same PIDs and same products in several states. Therefore, the question here is whether there are any "Operational or Procedural" differences that may affect OP-3, OP-4, OP-6, OP-15 and PO-5 for Loops and Interconnection trunks, MR-3 and MR-6 for Unbundled Loops, as well as OP-4, PO-5 and MR-3 for Line Sharing.

Regarding the measurement process, Qwest results are reported based on Product Code, State, CLEC Id (CLEC Identifier), ENTY\_CLS (MSA/Zone Type) and Dispatch. The state specific reports are created for the 14 states that Qwest provides the service for. For example, the Arizona (AZ) state report is created by pulling the records for the state of 'AZ', the Colorado (CO) state report is created by pulling the records for the state of 'CO' and so on.

Qwest treats all states the same in its data collection efforts. For example, the handling of the state of 'AZ' would be no different than the treatment of the state of 'CO'. Liberty, CLEC's (ATT, Covad and WorldCom) and Qwest have followed a meticulous data reconciliation process for the state of 'AZ'. For this reason Qwest believes that the reconciliation for the remaining 13 states is not vital as it would provide comparable analysis and impact the existing 'AZ' reconciliation report.

### **PO-5**

In regards to PO-5, there are no operational or procedural considerations that could cause differences in the results of the data reconciliation in different states. The same personnel that process Firm Order Confirmations (PO-5) for Arizona also process and manage FOC's in all other states. Analyzing PO-5 again would be completely redundant.

### **OP-3, 4, 6 & 15**

Qwest's Network operations and processes which impact PIDs OP-3, 4, 6 and 15 and MR-3 and 4 are consistent throughout the 14-state region. While some differences exist to accommodate individual state rules such as state specific provisioning intervals, these

differences do not impact the methods by which the PIDs are measured, nor do they affect the nature of the data. The methods and procedures utilized are the same throughout the regions.

For all 14 states, Loop orders are handled by Qwest centers in Duluth, MN & Phoenix, AZ, and LIS orders are handled by Qwest centers in Des Moines, IA & Salt Lake City, UT. These centers take the loop/LIS orders and manage them throughout the process from receipt of the initial ASR/LSR to input of the completion data. These centers actually input the jeopardy codes such as "CO1" (customer caused miss). Moreover, order processing is organized by customer, so an individual CLEC's orders are always managed by the same person or group of people. Uniformity on actual input of data is enforced via standardized training and documentation (Methods and Procedures). Thus, if additional reconciliation were performed, not only would Liberty be analyzing the same processes, it would be analyzing the same personnel managing the exact same processes. Thus, analyzing OP-3, 4, 6 & 15 would be completely redundant.

### **OP-13**

All hot cuts are handled through a single center. In the past, the center was the Des Moines Design Service Center. This role was migrated to the Qwest CLEC Coordination Center in Omaha. All unbundled loop coordinated hot cuts are handled the same for all 14 states. Therefore, the same personnel managing Coordinated Cuts (OP-13) for Arizona, also process and managed Coordinated Cuts in all other states. Analyzing OP-13 again would be completely redundant.

### **OP-15**

The Design Service Center in Des Moines handles all wholesale design services for unbundled loops and LIS Trunk orders for all 14 states. Therefore the same personnel managing unbundled Loop/LIS designing for Arizona, also manage Unbundled Loop/LIS designing in all other states. Analyzing OP-15 again would be completely redundant.

### **MR-3 and 4**

The method of handling repair tickets is consistent across all fourteen states. Wholesale customers are handled exclusively by one center across all 14 states. There are no regional differences. In the Field, all repair technicians receive the same training and use the same WFA systems to handle reported troubles.

### **Conclusion**

These findings are consistent with the KPMG Regional Differences Assessment report.