Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Qwest Communications International Inc.	)	**WC Docket No. _____**
	)	
	)	
Consolidated Application for Authority to Provide In-Region, InterLATA Services in Arizona	)	

DECLARATION OF WILLIAM M. CAMPBELL

Checklist Item 4 of Section 271(c)(2)(B):
Unbundled Loops

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DECLARATION OF WILLIAM M. CAMPBELL

Checklist Item 4 of Section 271(c)(2)(B): Unbundled Loops

Pursuant to 47 C.F.R. § 1.16, William M. Campbell declares as follows:

1. My name is William M. Campbell. My business address is 1801 California Street, Denver, Colorado. I am Director, Product Marketing – Interconnection Services, at Qwest Corporation ("Qwest"). [1/] I am the Product Director responsible for Checklist Item 4 – Unbundled Loops. In that position, I have directed the Qwest Unbundled Loop Product Team developing products and processes for the Qwest Unbundled Loop products and have the responsibility to represent Qwest in formal Section 271 proceedings. As part of Qwest's work to ensure its compliance with Section 271, I have participated extensively in the state

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1/ A description of my professional experience and education is attached as Exhibit WMC-LOOP-1 to this Declaration.

proceedings in Arizona, Colorado, Nebraska, Oregon, Washington, and the Multi-state 271 workshops involving Idaho, Iowa, Montana, New Mexico, North Dakota, Utah, and Wyoming. This includes directing testimony in South Dakota and Minnesota.

I. EXECUTIVE SUMMARY

2. Qwest satisfies the requirements of Section 271(c)(2)(B)(iv) of the Telecommunications Act of 1996 ("1996 Act" or "Act") and Federal Communications Commission ("Commission" or "FCC") rules that relate to the provision of unbundled loops. Consistent with the Act and Commission precedent, [2]/ Qwest has a concrete and specific legal obligation to provide competitors with nondiscriminatory access to unbundled loops under both its

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[2]/ *See New York 271 Order*, 15 FCC Rcd at 3962-63 (¶ 20) ("[T]he Commission must consult with the relevant state commission to verify that the BOC has one or more state approved interconnection agreements with a facilities-based competitor, or a statement of generally available terms and conditions ("SGAT"), and that either the agreement(s) or general statement satisfy the 'competitive checklist.'"); *see also Texas 271 Order*, 15 FCC Rcd at 18360-61 (¶ 11) (illustrating use of an SGAT, rather than individually negotiated interconnection agreements, to test compliance with the checklist requirements). Once an SGAT has gone into effect pursuant to Section 252(f)(3)(B), every CLEC is entitled to adopt any of the services or terms of the agreement pursuant to Section 252(i). The Commission has held that the "pick and choose" rule of Section 252(i) applies to SGATs. *See* 14 FCC Rcd at 20984-85 (¶ 167).

Statement of Generally Available Terms and Conditions ("SGAT") [3/] and state-approved interconnection agreements. [4/]

3. Qwest's unbundled loop offerings comply with Commission requirements. [5/] Qwest makes available to CLECs all required types of unbundled loops, including analog/voice grade loops, digital subscriber line ("xDSL") loops, and high-capacity loops. Qwest performs hot cuts for CLECs and, where technically feasible, provides CLECs with access to unbundled loops provisioned over integrated digital loop carrier ("IDLC") technology. Qwest performs loop conditioning where necessary to allow CLECs to provide digital services. Qwest also provides CLECs with nondiscriminatory access to pre-order loop makeup

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[3/] Qwest's Arizona SGAT is located at Attachment 5, Appendix B of this Application.

[4/] Appendix L contains state-approved interconnection agreements that Qwest has entered into with CLECs in Arizona as of August 1, 2003. The Arizona SGAT has been converted to a state-approved interconnection agreement ("SGAT-Based Interconnection Agreement") as the result of New Edge Networks' opt-in to the June 28, 2002, Arizona SGAT. Qwest relies on this agreement and the other interconnection agreements filed with the Arizona Commission, in addition to its SGAT, to establish checklist compliance. Unless otherwise noted, references to SGAT language and section numbers also are intended to refer to SGAT-Based Interconnection Agreements.

[5/] Qwest recognizes that in its Triennial UNE Review proceeding, the Commission modified its requirements with respect to unbundled loops. In the wake of the Commission's decision, Qwest will continue to ensure that its unbundled loop policies and practices are consistent with applicable federal law.

information. [6/] Finally, Qwest makes available to CLECs unbundled access to dark fiber loops, to subloops, and to the high-frequency portion of the loop. [7/]

4. As of May 31, 2003, Qwest had in service 37,719 unbundled loops in Arizona. (These figures represent stand-alone loops only, not those provided as part of a UNE combination.) Specifically, Qwest had in service 30,253 unbundled voice-grade analog loops, 5,578 xDSL-capable loops, and 1,888 high-capacity loops. The volume of unbundled loops in service demonstrates that Qwest is provisioning loops to CLECs in Arizona in a nondiscriminatory fashion. [8/]

II. QWEST HAS COMPLIED WITH THE COMMISSION'S UNBUNDLED LOOP REQUIREMENTS

5. Section 271(c)(2)(B)(iv) of the 1996 Act requires Bell Operating Companies ("BOCs") wishing to offer in-region interLATA service to provide "local loop transmission from the central office to the customer's premises, unbundled

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[6/] Qwest's loop qualification tools, policies, and practices are discussed in the Declaration of Lynn M V Notarianni and Loretta A. Huff on Operations Support Systems ("OSS").

[7/] These products are discussed in separate Declarations of Karen A. Stewart on, respectively, Dark Fiber, Network Interface Devices and Subloops, and Line Sharing and Line Splitting.

[8/] Exhibit WMC-LOOP-2 shows the growth in the number of loops in service in Arizona. Qwest's commercial performance for unbundled loops is described in the Commercial Performance Declaration of Dean Buhler.

from local switching or other services." [9/] In the *UNE Remand Order*, the Commission defined the local loop as:

> [A] transmission facility between a distribution frame (or its equivalent) in the incumbent LEC central office and the loop demarcation point at an end-user customer premises, including inside wire owned by the incumbent LEC. The local loop network element includes . . . dark fiber, attached electronics (except those electronics used for the provision of advanced services, such as Digital Subscriber Line Access Multiplexers), and line conditioning. [10/]

6. Qwest complies with the unbundled loop requirements of the 1996 Act and the Commission's rules and orders. Qwest has a concrete and specific legal obligation to provide CLECs with access to unbundled loops under its SGAT and state-approved interconnection agreements. Moreover, Qwest provides unbundled loops to CLECs in a nondiscriminatory manner.

7. The loop provisions in Qwest's SGAT have evolved not only on a state-by-state basis, but across Qwest's region through workshops and hearings that were part of collaborative processes, conducted on an open basis with active participation by CLECs. Throughout these processes, Qwest attempted to reach consensus with CLECs on SGAT language. When that was not possible, the

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[9/] 47 U.S.C. § 271(c)(2)(b)(IV).

[10/] *UNE Remand Order*, 15 FCC Rcd at 3772-78 (¶¶ 166-79); *see also* 47 C.F.R. § 51.319(a)(1).

"impasse" issue went to the state regulatory authority for resolution. As a result, Qwest's SGAT reflects a great deal of CLEC input.

8. In addition to the SGAT, Qwest further defines the specifications, interfaces, and parameters associated with unbundled loops in Technical Reference Publication Nos. 77384 (unbundled loops), 77375 (DS1), 77324 (DS3), and 77346 (OCn), all of which are available on Qwest's web site. [11]/ Qwest's Wholesale Product Catalog ("PCAT"), also available on Qwest's web site, provides CLECs with additional product information. [12]/

A. Qwest Offers All Required Categories of Unbundled Loops and Related Services

9. Qwest offers CLECs the complete range of unbundled loops. Specifically, Qwest offers (1) 2-wire and 4-wire voice-grade/analog loops; (2) four types of loops that generally can be grouped together in the category of "xDSL capable" loops; and (3) four types of high-capacity loops. [13]/

1. Voice-Grade/Analog Loops

10. *Basic 2-Wire/4-Wire Analog Loop.* The basic 2-wire/4-wire analog loop is available as a 2-wire or 4-wire voice grade, point-to-point configuration suitable for local exchange type services. This service is a

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[11]/ Technical publications can be found at http://www.qwest.com/wholesale/notices/techPub.html.

[12]/ The PCAT can be found at http://www.qwest.com/wholesale/pcat/index.html.

[13]/ *See* SGAT §§ 9.2.2.2-9.2.2.3, 9.2.6.1.

transmission path that provides a connection from the Qwest serving central office distribution frame or equivalent to the demarcation point at the end user's location. The actual loop facilities may utilize various technologies or combinations of technologies. [14/]

2. xDSL-Capable Loops

11. Qwest offers four types of loops that can be classified as "xDSL capable" loops: (1) 2-wire and 4-wire "non-loaded" loops, (2) asymmetrical digital subscriber line ("ADSL") compatible loops, (3) Basic Rate ISDN ("BRI") capable loops, and (4) xDSL-I capable loops.

12. *2-Wire/4-Wire Non-Loaded Loop*. The 2-wire/4-wire non-loaded loop is a metallic facility that provides a transmission path from the Qwest serving central office distribution frame, or equivalent, to the end user's demarcation point. It is a metallic, wire cable pair with no load coils, and, depending on the Network Channel ("NC") and Network Channel Interface ("NCI") codes specified by the CLEC, with, potentially, some limited lengths of bridged tap. Qwest will condition loops at the CLEC's request. The loop conditioning process is described in detail below.

13. *ADSL Compatible Loop*. The ADSL compatible loop is an unbundled 2-wire non-loaded metallic facility that establishes a transmission path between a Qwest serving central office distribution frame and the demarcation

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[14/] SGAT § 9.2.2.2.

point located at the end user's designated premises. This loop will meet the ADSL performance requirements specified in Qwest's Technical Publication No. 77384. If necessary, Qwest will condition the loop at the CLEC's request to meet ADSL technical parameters.

14. *Basic Rate ISDN ("BRI") Capable Loop*. The Basic Rate ISDN capable loop is a Qwest facility with a 2-wire interface that provides a transmission path from the Qwest serving central office distribution frame, or equivalent, to an end user's demarcation point. This loop transports bi-directional, 2-wire signals with a nominal transmission rate of 160 KBPS, meets the performance requirements specified in Qwest's Technical Publication No. 77384, and permits access to 144 KBPS channelized payload bandwidth for transport of services.

15. *xDSL-I Capable Loop*. The xDSL-I capable loop is a 2-wire facility that provides a transmission path from the Qwest serving central office distribution frame, or equivalent, to an end user demarcation point. This loop transports bi-directional, 2-wire signals with a standard transmission rate of 160 KBPS, meets the performance requirements specified in standard technical publications, and permits access to a nominal 144 KBPS unchannelized payload bandwidth for transport of services.

16. Qwest uses the terms "capable" and "compatible" to make it clear that while Qwest provides the loops themselves, CLECs provide the service over those loops. Specifically, "capable" means that Qwest assures that the loop

provisioned complies with industry technical standards. [15]/ The term "compatible" means that Qwest assures that the loop complies with the ordered NC/NCI codes, but makes no assumptions as to the capabilities of the CLEC's central office equipment or customer premises equipment ("CPE"). [16]/ Qwest does not restrict the CLEC's use of the loop except as expressly permitted or required by existing rules. [17]/

17. *Extension Technology*. Qwest provides extension technology, if needed, for Basic Rate ISDN ("BRI") capable loops and xDSL-I capable loops. [18]/ Extension technology takes into account, for example, additional regenerator placement, central office powering, and mid-span repeaters, if required, as well as BRITE cards in order to provision the Basic Rate ISDN capable or xDSL-I capable loop. Extension technology may be required to bring the circuit to the technical specifications necessary to accommodate the requested service. Qwest will add extension technology if the circuit design requires it or if requested by a CLEC to meet its specific needs. If the circuit design requires extension technology to meet

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[15]/ SGAT § 9.2.2.1.1. For example, ANSI Standards T1.601 and T1.102 specify the ISDN and DS1 interfaces. There are test sets that indicate whether the loop is performing to the established standards. Qwest will build the capable loop using whatever equipment it takes, such as subscriber loop carrier or range extenders, to ensure that the loop meets the standards.

[16]/ SGAT § 9.2.2.1.2.

[17]/ SGAT § 9.1.5.

[18]/ SGAT § 9.2.2.5.

the technical standards, then Qwest will add it at no charge. [19]/ However, if a CLEC requests the addition of extension technology even though the loop conforms to the technical standards, then the inclusion of extension technology will result in a monthly recurring charge to the CLEC.

3. High-Capacity Loops

18. Qwest offers four types of high-capacity loops under the SGAT: (1) DS1-capable loops, (2) DS3-capable loops, (3) OCn loops, and (4) dark fiber loops. [20]/

19. *DS1-Capable Loops*. The DS1-capable loop is a transmission path between the Qwest serving central office distribution frame, or equivalent, and the demarcation point at the end user location. The DS1-capable loop transports bi-directional DS1 signals with a nominal transmission rate of 1.544 Mbps and meets the design requirements specified in standard industry technical publications. [21]/

20. *DS3-Capable Loops*. The DS3-capable loop is a transmission path between a Qwest serving central office distribution frame, or equivalent, and a demarcation point at an end user location. The DS3-capable loop transports bi-

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[19]/ *Id*.

[20]/ SGAT § 9.2.1.

[21]/ SGAT § 9.2.2.6.1.

directional DS3 signals with a nominal transmission rate of 44.736 Mbps that meets the design requirements specified in standard industry technical publications. [22]/

21. For DS1- or DS3-capable loops, Qwest will provide the necessary electronics at both ends, including any intermediate repeaters. In addition, the CLEC will have access to these terminations for testing purposes. [23]/ Additionally, Qwest permits CLECs to add multiplexing to both DS1 and DS3-capable loops. [24]/

22. *OCn Capable Loops.* Qwest also stands ready to provide access to higher capacity loops, including OC3, OC12, OC48, and OC192 loops, where facilities are available. [25]/

23. *Dark Fiber Loops.* Qwest's dark fiber offerings are in section 9.7 of the SGAT and are discussed in the Dark Fiber Declaration of Karen A. Stewart.

B. Qwest Complies With the Commission's Spectrum Management Rules

24. Spectrum management is the administration of loop plant to facilitate spectrum compatibility for services and technologies that use pairs in the same cable. Spectrum compatibility, in general, refers to the ability of loop

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[22]/ SGAT § 9.2.2.6.2.

[23]/ SGAT § 9.2.2.6.

[24]/ SGAT § 9.2.2.10.

[25]/ SGAT § 9.2.2.3.1.

technology to operate and reside in the same or an adjacent binder group without causing an unacceptable degradation of service from the end user's perspective. [26]/

25. In the Arizona proceedings, Qwest's spectrum management policies generated an impasse issue. Qwest modified its Arizona SGAT to reflect the outcome of this issue in the ACC's final order on loops. [27]/ Qwest's spectrum policies therefore comply with the ACC's final order on loops. Qwest is also in compliance with current federal requirements for spectrum management. As the Commission continues to develop its spectrum management policies, Qwest will revise its spectrum policies as necessary to remain consistent with them.

C. Qwest Policies and Procedures with Respect to Unbundled Loops Demonstrate Qwest's Compliance with Checklist Item 4

26. The following sections describe the steps through which a CLEC obtains unbundled loops from Qwest, including ordering, provisioning, and maintenance and repair. Qwest has well-developed processes in place for provisioning, maintaining, and repairing unbundled loops for CLECs.

1. Ordering Process

27. *The Local Service Request Form*. CLECs order unbundled loops by completing a local service request ("LSR") and submitting it over one of Qwest's

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[26]/ *Line Sharing Order*, 14 FCC Rcd at 20988-89 (¶178).

[27]/ *ACC Loops Final Order*, ¶¶ 73-86.

electronic or manual interfaces. [28]/ For each unbundled loop ordered, CLECs must specify the loop type (including the NC/NCI codes), provide the Connecting Facility Assignment (which identifies where the loop should be wired in the central office), specify the desired installation option, and note the desired due date.

28. *Desired Due Dates and Standard Installation Intervals.* CLECs may calculate a due date based on the minimum number of days provided in the SGAT as Qwest's standard installation interval for the specified loop type. A CLEC may also specify a later date (*i.e.*, allow a longer installation interval than the standard interval). The following chart is a summary of Qwest's loop installation intervals in Arizona [29]/:

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[28]/ SGAT §§ 9.2.4.1, 9.2.4.4.

[29]/ Qwest's loop installation intervals are consistent with the ACC's final order. *ACC Loops Final Order*, ¶¶ 27-34.

Loop Type		1-8 loops	9-16 loops	17-24 loops	25+ loops
Analog/Voice Grade Loops	Standard Analog Loops	5 days	6 days	7 days	ICB
	Quick Loop Analog-Conversion [30]/	3 days	3 days	3 days	ICB
xDSL-Capable Loops	No Conditioning Required	5 days	6 days	7 days	ICB
	Conditioning Required	15 days	ICB	ICB	ICB
High-Capacity Loops	DS1-Capable	5 days	7 days	9 days	ICB
	DS3-Capable	7 days (1-3 loops)	ICB (4-16 loops)	ICB	ICB
	Fiber/OCn/Other High-Capacity	ICB	ICB	ICB	ICB

29. During the state proceedings, Qwest made a number of CLEC-friendly modifications to the loop installation intervals. For instance, Qwest reduced the interval for xDSL-I loops from 10 days to align with the intervals of 5, 6, and 7 days for xDSL- and ISDN-capable loops. Qwest also created a shorter installation interval for analog loop conversions, called Quick Loop. Quick Loop offers a three-day installation interval for conversion of existing service to a 2-wire analog loop ordered with the basic installation option. [31]/ Since October 22, 2001,

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[30]/ Qwest provides a 3-day installation option, called Quick Loop, for conversion of in-place analog loops that do not require coordinated installation or cooperative testing. Quick Loop is not available for loops served over IDLC technology. As discussed herein, Quick Loop is also offered for loops with number portability. The installation intervals for Quick Loop with LNP are 3 days for 1 to 24 loops and ICB for 25 or more loops.

[31]/ All Quick Loop performance results are reflected in the analog loop performance indicators.

this option has also been available for analog loops with number portability. Few CLECs have utilized the Quick Loop option to date. CLECs do not need a contract amendment to utilize these shortened intervals.

30. *Process for Requesting Loop Conditioning.* Loop conditioning (or line conditioning) is the term used to describe the process of removing load coils and excess bridged tap from existing copper loops that would negatively affect the transmission of a digital signal. In many cases, the data portion of the loop is diminished if there are load coils or certain amounts of bridged tap on the loop. To allow CLECs full use of the loop's capability, Qwest provides CLECs with loop conditioning for xDSL-capable services upon request, consistent with Commission rules. [32/] The ability to condition loops is not, however, unlimited. The conditioning requirement is subject to a technical feasibility standard the Commission has delineated. [33/]

31. Although the Commission does not require that Qwest condition loops proactively, in 2000 Qwest voluntarily established a bulk de-loading project to remove load coils from copper loops that are under 18,000 feet in length in selected wire centers and routes in which CLECs and Qwest were providing DSL services.

32/ *See* 47 C.F.R. § 51.319(a)(3)(i) & (h)(5) (ILECs must "remov[e] from the loop . . . any device that may diminish the capability of the loop to deliver high-speed switched wireline telecommunications capability, including xDSL service"); *see also* SGAT §§ 9.2.2.4 and 9.2.4.9.

33/ *Local Competition First Report and Order*, 11 FCC Rcd at 15691-92 (¶ 381).

The CLECs assisted Qwest in prioritizing the project schedule for this work. The de-loading project reduced the occurrence of short copper loops that needed to be conditioned on a one-by-one basis. Qwest provided the CLECs with a web-based tool that identified the wire centers and routes included in the project as well as an expected completion date. Once Qwest de-loaded a route and updated the databases, the route was posted on the web as a completed route. Two hundred ninety-eight wire centers were included in this project regionwide. [34/]

32. The bulk de-loading project was completed in March 2001 at no cost to the CLECs. As the individual jobs were completed, the conditioned pair status was updated in the loop qualification databases, increasing the available inventory of digital-capable loops. This inventory is available, as with all loops, on a first-come, first-served basis.

33. Qwest's loop qualification tools provide CLECs with information to determine whether loop conditioning will be required. [35/] When submitting an unbundled loop order, CLECs may indicate that they approve loop conditioning, where needed, by entering a "Y" (for yes) in the space provided for "special

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[34/] Qwest initiated a second bulk de-loading program in 2002. Thus Qwest continues to take voluntary steps to minimize the need for line-at-a-time conditioning.

[35/] These tools are described in the pre-order section of the OSS Declaration of Lynn M V Notarianni and Loretta A. Huff.

construction authorization" on the LSR form. [36]/ This entry on the LSR provides Qwest with approval to complete any required conditioning. If the LSR form contains the indicator for loop conditioning but conditioning is not required, then the due date can be consistent with the installation interval based on loop type and the number of non-conditioned loops ordered, as described above. [37]/

34. If the CLEC fails to indicate on the LSR form that loop conditioning is approved, but Qwest determines that conditioning is required, then Qwest will inform the CLEC of the need for conditioning. The CLEC then has a four-hour window to provide positive authorization via a supplement to the LSR. If the CLEC does not respond within four hours, Qwest cancels the order.

35. *Firm Order Confirmation*. Qwest will provide the CLECs with confirmation of the receipt of their LSR and indicate the due date for the service installation via a Firm Order Confirmation ("FOC"). One of Qwest's performance measures, PO-5, monitors the timeliness with which Qwest returns FOCs to CLECs in response to LSRs. PO-5 requires Qwest to provide the CLEC with a FOC for unbundled analog loops within 24 hours of receiving a valid and complete LSR. For

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[36]/ SGAT § 9.2.2.4.

[37]/ SGAT § 9.2.4.9.1.

xDSL- and DS1-capable loops, the PIDs require Qwest to return the FOC within 72 hours. [38]/

2. Provisioning Process

36. *Facility Assignment*. Although Qwest recommends that CLECs pre-qualify loops prior to placing an order, pre-qualification is not mandatory. Once a valid service order has been received by Qwest, all retail and wholesale orders follow the same facility assignment process. [39]/ The mechanized assignment process searches for compatible facilities and will assign the first compatible facilities that can support the requested loop type. If compatible facilities are not available for DS0-level facilities, Qwest uses a standard 11-step facility assignment process to try to identify compatible facilities. This process includes, but is not limited to, looking for a line and station transfer ("LST") or recovering defective pairs. The 11-step facility assignment process is presented in Exhibit WMC-LOOP-6.

37. *Provisioning Process*. When Qwest provisions an unbundled loop, a central office technician must be dispatched to run jumpers connecting the unbundled loop to the CLEC's connecting facility assignment ("CFA") as specified on the LSR by the CLEC. Additionally, a field technician may need to be

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[38]/ As a result of a trial conducted during the Colorado workshops, Qwest and CLECs agreed to support revising the FOC interval in the PO-5 PID for xDSL and DS1 loops from 24 to 72 hours. The ROC TAG approved that modification, and Qwest notified CLECs of the change through the Change Management Process. Qwest's performance under PO-5 is discussed in the Commercial Performance Declaration of Dean Buhler.

dispatched to perform cross connect work at the feeder distribution interface ("FDI"), pedestal, or network interface device ("NID"). Exhibits WMC-LOOP-7 and WMC-LOOP-8 delineate the tasks Qwest personnel perform to install an unbundled loop.

38. *Installation of Loops Provisioned with IDLC Technology*. The Commission requires Qwest to unbundle loops that are provisioned over integrated digital loop carrier ("IDLC") technology. However, the Commission acknowledged in the *UNE Remand Order* that unbundling loops provisioned over IDLC is difficult and may even be impossible in some circumstances. [40]/ Qwest is committed to providing CLECs access to unbundled loops, even when IDLC technology is deployed, whenever technically feasible. [41]/ Qwest has continuously provided loops on this type of facility since early 1999, long before Qwest offered an IDSL solution to Qwest's retail end users in April 2000. Throughout 2000 and 2001, Qwest worked through the difficulties inherent with the provisioning of loops for DSL generally, and loops provisioned with IDLC specifically. IDLC technology was the subject of discussion in state 271 workshops, and numerous CLEC meetings focused on identifying provisioning alternatives. Qwest worked cooperatively with CLECs to clear loop orders that were held due to IDLC provisioning issues by identifying

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[39]/ SGAT § 9.1.2.1.1.

[40]/ *UNE Remand Order*, 15 FCC Rcd at 3788-89 (¶ 204, n.390).

[41]/ SGAT § 9.2.2.2.1.

viable engineering solutions. Further, Qwest established a specialized team within the Qwest CLEC Coordination Center (which is described in paragraph 48 of this Declaration) to focus specifically on supporting CLEC unbundled loop orders over IDLC. Qwest developed and utilizes an engineering decision tree, depicted in Exhibit WMC-LOOP-5, to determine the best method to provision unbundled analog, ISDN, and xDSL-I loops served by IDLC.

39. To assist the CLEC considering future market opportunities, Qwest provides access to its ICONN database. [42]/ The ICONN database, available on Qwest's external website, provides information at a wire center level. Information includes number of total lines available, lines in service, and lines served by universal or integrated DLC.

40. Qwest also makes available wire center makeup information in the Wire Center Raw Loop Data Flat File. [43]/ This flat file is comma delimited and downloadable to an Excel type spreadsheet that allows the CLEC to manipulate and analyze the data. CLECs may also use Qwest's electronic interfaces, IMA-GUI and IMA-EDI, to obtain individual loop makeup information. [44]/

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[42]/ The ICONN database is located at http://www.qwest.com/iconn.

[43]/ CLECs must obtain a digital certificate in order to use this tool. Qwest's OSS web site, http://www.qwest.com/wholesale/systems, includes instructions for obtaining a digital certificate and for using the Wire Center Raw Loop Data Flat File.

[44]/ These tools are described in the OSS Declaration of Lynn M V Notarianni and Loretta A. Huff.

41. *Process for Conditioning Loops*. Qwest provides for loop conditioning to ensure that CLECs can obtain a copper loop without load coils and excessive bridged tap. Conditioning requires an engineering job to be issued and a construction technician is dispatched to the field to cut away from the load coil cable stub and re-splice the loop together. For efficiency, CLECs may request both line conditioning and installation on the same LSR.

42. Two loop conditioning issues reached impasse in the Arizona Section 271 proceedings. The first involved a question of whether Qwest must reimburse a CLEC for conditioning costs if the CLEC loses the customer within a certain period of time, as the CLECs presumed that such a loss would be due to Qwest's actions. The ACC ordered a change to SGAT section 9.2.2.4.1, providing for a credit of conditioning charges if Qwest does not meet a due date for line conditioning or does not perform conditioning in accordance with the standards applicable under the SGAT. [45]/

43. The second loop conditioning issue involved a question of whether Qwest may charge CLECs for conditioning lines of less than 18,000 feet in length. The ACC affirmed that the *UNE Remand Order* permitted such charges and required no change to the SGAT language on this issue. [46]/

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[45]/ *ACC Loops Final Order*, ¶¶ 70-72.

[46]/ *Id*., ¶¶ 66-67.

44. *Installation Options.* Qwest's SGAT offers CLECs five installation options, all of which are available for both the conversion of existing customer lines to unbundled loops and the installation of new unbundled loops. [47]/ These options are: (1) basic installation; (2) basic installation with performance testing; (3) basic installation with cooperative testing; (4) coordinated installation; and (5) coordinated installation with cooperative testing. In addition, Qwest offers an enhancement to the standard installation options called project coordinated installation, which is available for high-volume orders and other special orders. [48]/ Regardless of the installation option chosen, Qwest notifies the CLEC when the installation work is complete. Qwest also coordinates the activities associated with installation of unbundled loops and number portability, as depicted in Exhibit WMC-LOOP-4. Qwest's installation options are described in further detail below.

45. *Basic Installation Options.* CLECs may select from among three options for basic (*i.e.*, non-coordinated) installation. First, the Qwest central office technician and field technician execute basic performance tests and perform the installation. [49]/ If a CLEC selects basic installation with performance testing, Qwest technicians conduct performance tests and provide the results to the CLEC

47/ SGAT §§ 9.2.2.9.1 - 9.2.2.9.5.

48/ SGAT § 9.2.2.9.7.

49/ SGAT § 9.2.2.9.1.2.

after the tests are concluded. [50]/ Qwest has implemented a process to e-mail the test results to CLECs within two business days so that CLECs have a written record of the tests Qwest performs. [51]/ For the basic installation with cooperative testing option, after the Qwest technicians conduct their performance tests, they contact the CLEC with the results, and the CLEC performs its own loop back acceptance test. The CLEC then accepts the loop, and the parties exchange demarcation information. [52]/ If Qwest fails to perform cooperative testing due to Qwest's fault, Qwest will waive the non-recurring charge for the installation option. [53]/

46. *Coordinated Installation Options.* Coordinated installation and testing are often needed by the CLEC in order to have a seamless installation for the end-user customer. The coordinated installation options allow the CLEC to designate a specific appointment time on the date when Qwest will begin the installation of an unbundled loop. The CLEC may request installation outside the standard business hours of 8:00 a.m. to 5:00 p.m. on business days, but additional charges apply. CLECs most often request a coordinated installation to coordinate work between Qwest and the CLEC when the service is associated with an existing

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[50]/ SGAT §§ 9.2.2.9.2.1-9.2.2.9.1.3.

[51]/ SGAT § 9.2.2.9.3.2.

[52]/ SGAT § 9.2.2.9.5.1.

[53]/ SGAT § 9.2.2.9.5.3.

working line, although coordinated installation is also available for new customer lines. [54]/ Coordinated installation enables the CLEC and its customer to plan ahead for minimal service interruption.

47. Qwest has established a control center, the Qwest CLEC Coordination Center ("QCCC"), to coordinate all loop installations. Qwest created the QCCC to improve the level of service on hot cuts. After observing the best practices of other ILECs and customizing for Qwest use, Qwest invited the CLEC community to review and suggest modifications to the QCCC's business processes. [55]/ The QCCC continues to improve performance through focused operational analysis, continued CLEC feedback, and proposed Change Request ("CR") activity. [56]/ Approximately 100 Qwest employees work at the center, all having completed unique and focused training. After the establishment of the

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[54]/ Exhibit WMC-LOOP-7 is the process flow for coordinated installation of new loops, which includes a description of the tasks performed for these types of installations. Exhibit WMC-LOOP-8 is the process flow for the coordinated installation of an existing customer, commonly called a "hot cut." Page two of the Exhibit defines the tasks, and page three is a sample of the data collected by Qwest implementers to track the coordinated installation.

[55]/ Qwest invited the CLEC community to a forum dedicated to reviewing the new hot cut procedures in the QCCC. The May 2001 session was a constructive two-way dialogue modifying and clarifying the resulting processes for the QCCC operation.

[56]/ CR# 5548229 is an example of a CLEC-submitted CR. This CR, accepted and implemented by Qwest, allows CLECs to verbally change Connecting Facility Assignment ("CFA") on an order to resolve CLECs' CFA assignment issues without renegotiating a new due date. CR# 5548229 can be found on Qwest's web site, at http://www.qwest.com/cmp/changerequest.html.

QCCC in March 2001, Qwest's performance for providing coordinated installations improved significantly, as Exhibit WMC-LOOP-10 shows. In April 2002, the QCCC assumed all control responsibility for installing unbundled loops.

48. On the order due date at the appointment time specified by the CLEC, a QCCC coordinator coordinates activities between the CLEC and Qwest. A call is placed to the CLEC to determine if the CLEC is ready for the service to be transferred. If the CLEC is ready, Qwest central office and field work is performed. If the CLEC indicates that it is not ready, Qwest will wait up to 30 minutes from the appointment time. If the CLEC is still not ready, then a new appointment (date and time) is scheduled. If Qwest misses the appointment time by 30 minutes or fails to perform cooperative testing, due to Qwest's fault, Qwest will waive the non-recurring installation charge. If Qwest fails to perform testing, Qwest will reschedule the test at no charge to the CLEC if the CLEC still wishes to perform cooperative testing. [57/]

49. The first coordinated installation option is coordinated installation without cooperative testing. On the due date, at the CLEC-designated appointment time, the QCCC coordinator contacts the CLEC to ensure that they are ready for the installation. The Qwest technicians complete the installation and

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57/ SGAT §§ 9.2.2.9.3, 9.2.2.9.4.

work with the Qwest implementor/tester to complete the required performance tests. The CLEC is verbally advised that the installation is complete. [58]/

50. The second option is coordinated installation with cooperative testing. This option permits the CLEC to request an appointment time as well as joint testing with Qwest. When a CLEC requests a coordinated installation with cooperative testing, Qwest will perform testing with the CLEC to ensure connectivity between a CLEC's collocated equipment and its network demarcation point. [59]/ Cooperative testing is performed after the Qwest installation and testing. The cooperative test is requested by the CLEC, and Qwest will assist in these tests at the CLEC direction. As with basic installation with cooperative testing, Qwest provides CLECs with an option to receive the Qwest test results via e-mail.

51. Qwest also offers project coordinated installation. This highly synchronized form of coordinated installation permits the CLEC to obtain a coordinated installation for unbundled loops with or without number portability where the CLEC orders unbundled DS1-capable loops, DS3-capable loops, or 25 or more DS0 unbundled loops. Because of the increased collaboration between Qwest and the CLEC with a project coordinated installation, Qwest and the CLEC must negotiate the date and time for the installation in advance. Project coordinated

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[58]/ SGAT §§ 9.2.2.9.4.1-9.2.2.9.4.2.

[59]/ SGAT § 9.2.2.9.3.

installation was negotiated during the state workshop processes and can be added to any CLEC interconnection agreement in Arizona. [60]/

52. To perform a coordinated installation, both companies must be ready at the same time on the scheduled due date. The activities that occur on the due date are critical to the success of an "on time" installation. In order for a coordinated installation to be considered on time, Qwest must perform the following due date activities: contact the CLEC prior to starting the installation; complete the Qwest physical work within a specified time period; and call the CLEC when the job is completed.

53. When coordinated installations involve existing customers, they are often referred to as "hot cuts." A hot cut involves a "lift and lay" procedure in the central office: a Qwest technician removes the customer's line from a Qwest switch and attaches it to a CLEC switch. At the QCCC, Qwest employs "hot cut coordinators" who review hot cut orders for accuracy and are responsible for events on the hot cut due date, including final verification of the order, calls to the central office and the CLEC, the lift and lay, dial-tone verification, and notification of completion. Qwest's commercial performance with respect to hot cuts has been excellent and is discussed in the Commercial Performance Declaration of Dean Buhler.

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[60]/ SGAT § 9.2.2.9.7.

54. *Installation of Loops If No Compatible Facilities Exist.* Qwest's policies with respect to the construction of UNEs in Arizona are fully consistent with the ACC's final order on unbundled loops. [61]/ If a CLEC orders an unbundled loop and compatible facilities are available, Qwest will perform incremental facility work (*i.e.*, conditioning, placing a drop, adding a network interface device, adding a card to existing equipment in the central office or remote locations, adding central office tie pairs, or adding field jumper cross-connects) if necessary to complete the order. If the CLEC requests an unbundled loop and compatible facilities are not available, the following process takes place: [62]/

- If an engineering job is pending that satisfies the request, Qwest will accept the LSR and inform the CLEC of the ready-for-service date.
- If the LSR is requesting a loop to provide an end user with primary voice grade service that would fall under Qwest's Provider of Last Resort ("POLR") or Eligible Telecommunications Carrier ("ETC") obligation, Qwest will accept the order and build the new facility.
- If the request is for the unbundling of a loop supported by IDLC technology, Qwest will accept the LSR and process it according to the process described above for IDLC loops.
- If the LSR does not fall into one of the above categories, Qwest holds the order for 30 business days and continues to attempt to assign compatible facilities. [63]/ If a facility becomes available during the 30 business day period, the order will be released and installed for the retail or wholesale order. The availability of

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[61]/ *ACC Loops Final Order*, ¶¶ 56-62.

[62]/ SGAT §§ 9.1.2.1.3, 9.1.2.1.3.1, 9.1.2.1.3.2.

[63]/ SGAT § 9.2.2.16.

> facilities is on a first-come, first-served basis. The CLEC must approve the activity prior to installation of the CLEC order. If after 30 business days compatible facilities still are not available, Qwest will reject the order and inform the CLEC that no compatible facilities exist. [64]/ At any time, the CLEC has the option to request the facilities according to the construction process outlined in the SGAT. [65]/

55. In a petition for enforcement filed in WC Docket No. 02-314, CLECs recently raised concerns about Qwest's construction policies as they apply to DS1 loops. [66]/ CLECs have raised the same concerns in Arizona and other states in Qwest's territory. In response, Qwest has agreed to provision DS1 loops to CLECs where existing DS0 facilities can be used to construct new DS1 facilities. This policy will remain in effect until rates for the construction of DS1 loops from existing DS0 facilities can be developed. Any remaining CLEC concerns relating to DS1 loops will be addressed in separate proceedings at the Commission and in the states.

3. Maintenance and Repair Process

56. Consistent with Commission requirements, [67]/ Qwest maintains unbundled loops utilizing a defined maintenance and repair flow. [68]/ A CLEC can

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[64]/ After 30 business days the CLEC may submit a second order, and Qwest will continue to attempt to assign compatible facilities for another 30-day period.

[65]/ SGAT § 9.19. In addition, Qwest provides notification of major facility builds through the ICONN database. SGAT § 9.1.2.4.

[66]/ *Petition for Enforcement Pursuant to Section 271(d)(6) of the Act*, WC Docket No. 02-314 (filed July 29, 2003).

[67]/ *See, e.g., Second Louisiana 271 Order*, 13 FCC Rcd at 20692 (¶ 145).

report repair problems by issuing repair tickets or by calling Qwest's repair center. Qwest creates a trouble ticket, which is processed using the same systems that are used to process trouble tickets for Qwest retail services. The trouble ticket is passed to the appropriate groups to analyze, test, and repair any Qwest problems that are identified. The repair technician closes the ticket when the CLEC is notified that the trouble is resolved. Qwest will also advise the CLEC if no trouble is found or if the problem is not in the Qwest network.

57. Exhibit WMC-LOOP-9 is a flow chart that delineates the tasks Qwest personnel perform to maintain unbundled loops. This Exhibit also includes a matrix that describes each of the work tasks identified in the flow chart.

58. Qwest charges CLECs for trouble isolation only if the trouble is isolated to the CLEC side of the Loop Demarcation Point or as otherwise provided for in the CLEC's contract. [69]/

59. *Commercial Volumes.* As of May 31, 2003, Qwest had in service 37,719 unbundled loops for 14 CLECs in Arizona. (These figures represent stand-alone loops only, not those provided as part of a UNE combination.) Specifically, Qwest had in service 30,253 unbundled voice-grade analog loops, 5,578 xDSL-capable loops, and 1,888 high-capacity loops. Qwest's performance in provisioning

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[68]/ SGAT § 9.2.5.

[69]/ SGAT §§ 9.2.5.1-9.2.5.3.

and repairing these loops has been outstanding and is described in the Commercial Performance Declaration of Dean Buhler.

III. THE ARIZONA COMMISSION HAS THOROUGHLY REVIEWED QWEST'S UNBUNDLED LOOP OFFERINGS

60. The ACC has thoroughly reviewed Qwest's provisioning of unbundled loops in an open and collaborative process. The first unbundled loop workshop was held on March 5, 2001. In addition to Qwest, parties participating in the workshops included AT&T, MCI WorldCom, Sprint, Electric Lightwave, Inc., e.spire, Eschelon Telecom, and Allegiance Telecom. Parties filed testimony and comments between July 2000 and March 2001. An additional workshop was held on May 14, 2001. Through the workshop process, all but eleven disputed unbundled loop issues were resolved, with the appropriate changes made to the Arizona SGAT.

61. On February 20, 2002, ACC Staff filed a Final Report on Qwest's Compliance with Unbundled Loops. After another round of comments by the parties and a recommendation by an administrative law judge, the ACC issued its final order on unbundled loops on May 17, 2002. [70/]

62. Most of the significant impasse issues relating to unbundled loops are described in this Declaration. However, two issues relating to loop qualification are discussed in the pre-ordering section of the OSS Declaration of Lynn M.V. Notarianni and Loretta A. Huff. Although other impasse issues arose in

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[70/] *ACC Emerging Services Final Order.*

the workshop processes relating to unbundled loops, they are not significant for purposes of examining Qwest's Section 271 compliance, and Qwest is in full compliance with the ACC's resolutions of each of them. [71/]

IV. SUMMARY AND CONCLUSION

63. Qwest satisfies the unbundled loop requirements of Section 271(c)(2)(B)(iv). Qwest provides unbundled loops in a nondiscriminatory manner to CLECs in Arizona. This Commission should therefore find that Qwest has satisfied Checklist Item 4.

64. This concludes my Declaration.

71/ These issues are: 1) allegations of cooperative testing failures, on which the ACC approved Qwest's position; 2) allegations of anticompetitive behavior by Qwest employees, for which the ACC required a change to the SGAT that Qwest promptly made; 3) reciprocity of trouble isolation charges, which the ACC determined had been closed already, and 4) redesignation of interoffice facilities as loop facilities, on which the ACC approved Qwest's policies but required a clarification of those policies in the SGAT. *ACC Loops Final Order*, ¶¶ 87-104, 111-17.