

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Petition of Qwest  
Corporation for Arbitration with Eschelon  
Telecom, Inc. Pursuant to 47 U.S.C. Section  
252 of the Federal Telecommunications Act of  
1996**

**Docket No. UT-063061**

**EXHIBIT BJJ-13**

**TO THE**

**DIRECT TESTIMONY OF BONNIE J. JOHNSON**

**ON BEHALF OF ESCHELON TELECOM, INC.**

**SEPTEMBER 29, 2006**

Qwest-Eschelon Email Exchange

Relating to BJJ-12

**From:** Novak, Jean [CONTACT INFORMATION REDACTED]  
**Sent:** Thursday, August 24, 2006 11:59 AM  
**To:** Isaacs, Kimberly D.; Nielsen, Joshua  
**Cc:** Johnson, Bonnie J.  
**Subject:** RE: Immediate Action Required - Qwest Retail Letters Sent to End User's Converting to Eschelon.

I will take this. We had this before and it was human error. Jean

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**From:** Isaacs, Kimberly D. [CONTACT INFORMATION REDACTED]  
**Sent:** Thursday, August 24, 2006 11:58 AM  
**To:** Novak, Jean; Nielsen, Joshua  
**Cc:** Johnson, Bonnie J.; Isaacs, Kimberly D.  
**Subject:** Immediate Action Required - Qwest Retail Letters Sent to End User's Converting to Eschelon.

Hello Jean and Josh,  
Eschelon is receiving sporadic reports from end users that are converting to Eschelon that they are receiving letters from Qwest retail. The Qwest retail letters state:

“Thank you for once again putting your trust in Qwest. We’re pleased to continue bringing you the quality and reliability you demand, along with a level of service you’d be proud to give your own customers.

To make sure this new phase in our relationship starts off on the right foot, **please verify your order details listed at left and review the enclosed instructions.**”

The order number and due date “at left” on the Qwest retail letter is the Eschelon “C” order number associated with Eschelon’s request for a partial conversion of 1 line to Eschelon QPP w/DSL. It is not acceptable for Qwest retail to engage this type of communication with an end user who has chosen Eschelon as their local service provider for some or all of their service. Eschelon is requesting that Qwest determine why this type of letter is generated and ensure that this type of communication no longer occurs.

Example:

PON: CO724206DSLNLXK

LSR ID: 18451981

Qwest Order Numbers: C62078891 and N62078915

Request for a partial conversion of 1 line to Eschelon QPP w/DSL. Please note that the other telephone numbers on this customer’s Qwest retail account are converting to Eschelon Loop with LNP and are addressed on another LSR.

Qwest Retail sent a letter with the language quoted above to the end user customer on 8-10-06.

**ACTION:**

Please determine why the Qwest retail letters, with the Eschelon order number, are being generated and sent to the end user.

Please ensure that this type of communication is not longer sent to customers, who have chosen Eschelon as their local service provider. Eschelon’s end user customers are concerned and very confused when they receive this type of communication from Qwest retail.

Thank you.

*Kim Isaacs*

*Eschelon Telecom, Inc., ILEC Relations Process Specialist, [CONTACT INFORMATION REDACTED]*

## Qwest Retail Letter Chronology

**QWEST RETAIL LETTER - CHRONOLOGY**

- 8/4/2006 Eschelon submitted a Local Service Request (LSR) [with the Purchase Order Number (PON) of CO724206DSLNLKX; LSR Identification (ID) 18411855]. On the LSR, Eschelon requested conversion of service from Qwest Retail (the Customer's former provider) Eschelon (*i.e.*, a carrier switch).<sup>1</sup>
- 8/4/2006 In response to Eschelon's initial LSR, Qwest sent Eschelon a firm order confirmation (FOC). [On the FOC, Qwest provided Qwest Change "C" order number C60809986 (a Qwest C order to disconnect from the Qwest Retail account) and New "N" order number N60809987 (a Qwest N order to install on to a new Eschelon account).]
- 8/9/2006 Eschelon submitted a supplemental Local Service Request (LSR) [with the Purchase Order Number (PON) of CO724206DSLNLKX; LSR ID 18451981] to change the requested due date to 8/29/06. On the supplemental LSR, Eschelon also requested conversion of service from Qwest Retail (the Customer's former provider) Eschelon (*i.e.*, a carrier switch) but changed the requested due date.
- 8/9/2006 In response to Eschelon's supplemental LSR, Qwest sent Eschelon a firm order confirmation (FOC) confirming that the conversion of service from Qwest Retail to Eschelon would take place on 8/29/06. [On the FOC, Qwest provided Qwest Change "C" order number C62078891 (a Qwest C order to disconnect from the Qwest Retail account) and New "N" order number N62078915 (a Qwest N order to install on to a new Eschelon account).]
- 8/10/2006 Eschelon's End User Customer received a letter dated August 10, 2006, from Qwest Retail. *See* Exhibit BJJ-12. In the margin of the letter, Qwest included *the date of Eschelon's supplemental order (8/9/09)* and Eschelon's C order number (*C62078891*). The body of the letter said (with emphasis in original):

"Thank you for once again putting your trust in Qwest. We're pleased to continue bringing you the quality and reliability you demand, along with a level of service you'd be proud to give your own customers.

To make sure this new phase in our relationship starts off on the right foot, **please verify your order details listed at left and review the enclosed instructions.**

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<sup>1</sup> This End User Customer had 2 lines with Qwest and wanted both converted to Eschelon. Eschelon converted one line with this LSR and the other at a later time with a separate LSR. Qwest requires two LSRs for this type of conversion. *See* <http://www.qwest.com/wholesale/clecs/ordering.html> (deconsolidation).

**Important Things to Remember**

- Manage your account conveniently at [qwest.com/smallbusiness](http://qwest.com/smallbusiness). View and pay your bill, sign up for special offers, find product information, and more.
- Get the **best value for your dollar** when you bundle Qwest High-Speed Internet, long-distance and/or wireless services with a Qwest Choice Business line. Call or visit us online to learn more.

We look forward to helping you grow your business. As your communications needs expand and change, you know you can call us at 1-800-997-9378.

Sincerely,

Qwest Business Marketing

P.S. If you have any questions about your order, or to learn more about the valuable Qwest options available to you, just call 1-866-997-9378 or visit us at [qwest.com/smallbusiness](http://qwest.com/smallbusiness).”

- 8/21/2006 Although the letter invited the End User Customer to call Qwest, the End User Customer did not initiate contact with Qwest. Instead, *the Qwest Retail Business Office called the End User Customer directly about Eschelon's wholesale order*. The Qwest Retail Business Office told the End User Customer that the service would be *disconnected* at Eschelon's request on 8/29/06 (via Qwest order C62078891).  
The Qwest Retail Business Office did not tell the End User Customer that his service would be transferred to an Eschelon account on 8/29/06 (via Qwest order N62078915) so service disruption would not occur.
- 8/21/2006 Based on the information provided by the Qwest Retail Business Office, the End User Customer called Eschelon extremely upset that his service was going to be disconnected at Eschelon's request. The End User Customer said he was so concerned he was considering cancelling his request to convert the service to Eschelon.
- 8/23/2006 Eschelon's Service Delivery group had to contact the End User Customer and explain Qwest's letter and why the Customer would not be losing service, despite Qwest's use of the term "disconnect." Only after this discussion did the End User Customer say he would move forward with the switch to Eschelon. The End User Customer said he remained concerned about the switch.

- 8/24/2006 Eschelon's End User Customer faxed a copy of the Qwest Retail letter to Eschelon.
- 8/24/2006 Eschelon sent the Qwest Wholesale Service Management team an email about the Qwest Retail letter sent to the End User Customer switching to Eschelon. Eschelon asked Qwest to "ensure that this type of communication is not longer sent to customers, who have chosen Eschelon as their local service provider." See E-mail attached above.
- 8/24/2006 Qwest's Wholesale Regional Service Director responded: "I will take this. We had this before and it was human error." See E-mail above.
- 8/29/2006 Qwest sent Eschelon a completion notice indicating that Eschelon's order had completed. The End User Customer's service was converted to Eschelon.
- 8/31/2006 In an email (attached below), Qwest's Wholesale Regional Service Director provided a root cause analysis stating (with Eschelon footnote added):

"Eschelon requested on LSR 18451981 Version 4 to convert 1 line (CUSTOMER-IDENTIFYING INFORMATION REDACTED) to Eschelon and maintain 1 line (CUSTOMER-IDENTIFYING INFORMATION REDACTED) with Qwest. This end user had subscribed to Qwest's 2-line package.

Qwest's contracted employee incorrectly issued the C order. The order should have changed the 2-line package to no package, which would have converted 1 line (CUSTOMER-IDENTIFYING INFORMATION REDACTED) to Eschelon and retained 1 line (CUSTOMER-IDENTIFYING INFORMATION REDACTED) with Qwest. By issuing the order incorrectly, a letter was automatically generated by the system because the end user's account had changed from a Qwest 2-line package to a Qwest 1 line package.

Qwest Retail did not issue the letter to be sent to this customer on August 10, 2006. The letter was generated automatically by the system because of the C order being incorrectly issued by Qwest Wholesale. The original LSR 18411855 was sent by Eschelon on 8/4/06 with a due date of 8/9/06. The last LSR 18451981 as issued on due date 8/9/06 to change the due date to 8/29/06. Because the LSR was issued on due date the incorrectly written order had already been processed and waiting for due

date. The system had automatically generated to coincide with the original due date of 8/9/06.<sup>2</sup>

Qwest has requested retraining of the contracted employee and all contracted employees have been advised of the correct process and also shown where the process is documented. The situation has addressed.

Please provide to me immediately and further examples so Qwest can take immediate action to correct.”

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<sup>2</sup> *Note:* The original due date of 8/9/06 was requested on the LSR Eschelon submitted on 8/4/09 (for which the C order number was C60809986). The letter from Qwest Retail, however, did not reference the 8/4/09 order or its C order number. The letter from Qwest Retail (Exhibit BJJ-12) specifically gave the supplemental order date of “08-09-2006” and its C order number of C62078891, identifying the 8/9/09 supplemental order (which had a due date of 8/29/06) as the one prompting the letter.



Qwest Retail Letter –

Qwest Service Management 8-31-06 Email

**From:** Novak, Jean [CONTACT INFORMATION REDACTED]  
**Sent:** Thursday, August 31, 2006 10:32 AM  
**To:** Isaacs, Kimberly D.; Nielsen, Joshua  
**Cc:** Johnson, Bonnie J.  
**Subject:** Immediate Action Required - Qwest Retail Letters Sent to End User's Converting to Eschelon.

Kim

I can not remember if I responded to this fully so if I have please forgive the redundancy.

Eschelon PON CO724206DSLNLK

LSR 18451981

Eschelon requested on LSR 18451981 Version 4 to convert 1 line ([CUSTOMER INFORMATION REDACTED]) to Eschelon and maintain 1 line ([CUSTOMER INFORMATION REDACTED]) with Qwest. This end user had subscribed to Qwest's 2-line package.

Qwest's contracted employee incorrectly issued the C order. The order should have changed the 2-line package to no package, which would have converted 1 line ([CUSTOMER INFORMATION REDACTED]) to Eschelon and retained 1 line ([CUSTOMER INFORMATION REDACTED]) with Qwest. By issuing the order incorrectly, a letter was automatically generated by the system because the end user's account had changed from a Qwest 2-line package to a Qwest 1 line package.

Qwest Retail did not issue the letter to be sent to this customer on August 10, 2006. The letter was generated automatically by the system because of the C order being incorrectly issued by Qwest Wholesale. The original LSR 18411855 was sent by Eschelon on 8/4/06 with a due date of 8/9/06. The last LSR 18451981 as issued on due date 8/9/06 to change the due date to 8/29/06. Because the LSR was issued on due date the incorrectly written order had already been processed and waiting for due date. The system had automatically generated to coincide with the original due date of 8/9/06.

Qwest has requested retraining of the contracted employee and all contracted employees have been advised of the correct process and also shown where the process is documented. The situation has addressed.

Please provide to me immediately and further examples so Qwest can take immediate action to correct.

Thanks,

Jean Novak