

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

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|---------------------------------------|---|----------------------------|
|                                       | ) |                            |
| In the Matter of Qwest Corporation’s  | ) |                            |
| Notice of Modifications to Exhibit B  | ) | DOCKET NO.                 |
| and Exhibit K of the                  | ) |                            |
| Statement of Generally Available      | ) |                            |
| Terms and Conditions                  | ) |                            |
| .....                                 | ) |                            |
|                                       | ) |                            |
| In the Matter of the Six-Month Review | ) | DOCKET NO. UT-033020       |
| of Qwest Corporation’s Performance    | ) |                            |
| Assurance Plan                        | ) | QWEST CORPORATION’S        |
|                                       | ) | NOTICE OF MODIFICATIONS TO |
|                                       | ) | EXHIBIT B AND EXHIBIT K TO |
|                                       | ) | THE STATEMENT OF           |
|                                       | ) | GENERALLY AVAILABLE        |
|                                       | ) | TERMS AND CONDITIONS       |
|                                       | ) |                            |
| .....                                 | ) |                            |

INTRODUCTION

Qwest Corporation (“Qwest”) submits an updated Exhibit B to the Statement of Generally Available Terms and Conditions (“SGAT”), which is the Performance Indicator Definitions (“PIDS”) and an updated Exhibit K, which is the Performance Assurance Plan, appended to Qwest’s SGAT. Copies of updated Exhibits B and K are attached.<sup>1</sup> This submission is being made for three reasons. First, in its Order on Issues Pending in First Six-Month Review Period (“Order No. 5”)<sup>2</sup>, the Commission ordered Qwest to file an amended Exhibit B to include line splitting and enhanced extended links (“EELs”) consistent with Section III.B.3

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<sup>1</sup> Qwest is submitting “clean” and “red-lined” versions of both Exhibit B and Exhibit K, as modified.

paragraphs 59 and 60, and an amended Exhibit K to include EELs consistent with Section III.C.3, paragraph 77. Second, Qwest, working through the Long Term PID Administration (“LTPA”), identified certain administrative PID changes and changed certain subparts to PID GA-1, Gateway Availability – IMA-GUI, with agreement of the LTPA participants. Qwest advised the Commission of these changes in the Joint LTPA Status Report which the parties filed January 12, 2004. A more detailed description of these changes follows. Third, Qwest has also made certain modifications to Exhibit B to make it identical with the Exhibit B in Qwest's other 13 states. To accomplish this, Qwest has added references in some instances to unique PID standards that apply to Colorado and Arizona. No changes were made to any PID standards that are in effect in Washington. These changes result in a single Exhibit B that applies to all 14 states while accommodating those circumstances where unique standards apply in only one or two states. A 14-state PID will be easier to administer and should be easier for State Commission Staffs and those CLECs operating in multiple states to understand that which is common to all states and that which is unique to a state; they will only have to look at one Exhibit B, which is the same in all states, rather than looking at multiple versions of Exhibit B in a number of states.

#### DETAILED DESCRIPTIONS OF MODIFICATIONS

1. Qwest has modified Exhibit B in a manner that is consistent with Order No. 5, to include line splitting as a separate product reporting category under PIDs PO-5, OP-3, OP-4, OP-5 OP-6, MR-3, MR-4, MR-6, MR-7 and MR-8. Two explanations are warranted. First, the Commission ordered this separate line splitting reporting item under PID PO-5; however,

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<sup>2</sup> *In the Matter of the Six-Month Review of Qwest Corporation's Performance Assurance Plan*, Order on

the structure of PO-5 required the inclusion of line splitting within one of three product categories. PO-5 defines standard firm order confirmation (“FOC”) intervals by product but specifies reports by product category. Therefore, to comply with the Commission’s order and to account for the structure of PO-5, Qwest is adding line splitting as a separate item to the FOC interval for line-sharing (24 hour FOC interval for 1-24 loops), and will report the performance in the sub-measure (b), Unbundled Loops and Specified Unbundled Network Elements product category, where line-sharing is also reported. These modifications were in fact addressed and agreed-to by the LTPA on January 8, 2004.

Second, line splitting is already disaggregated in OP-5 by agreement of the ad hoc LTPA. The revised OP-5, which disaggregates line splitting, became effective on October 2, 2003. Therefore, no additional modifications to this PID were necessary to comply with Order No. 5.

Also, Qwest has in a manner that is consistent with Order No. 5, incorporated the EELs standards in Exhibit B and the payment opportunities in Exhibit K to which Qwest stipulated in Colorado. A description of how the CPAP implemented EELs may prove helpful. The CPAP produces performance and payment reports for EELs DS-1 relative to the applicable standards in the PIDs PO-5, OP-3, OP-4, OP-5A, OP-6A, MR-5, MR-6, MR-7 and MR-8. Additionally, Qwest provides performance data for EELs DS-3 in its performance reports only on an informational basis and solely for OP and MR PIDs. Payment reports for EELs DS-3 are not provided because they are not included in the CPAP. In order to account

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Issues Pending In First Six-Month Review Period, Docket No. UT-033020, Order No. 05, January 16, 2004.

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for how the CPAP treats EELs and be in compliance with this Commission's order, the following modifications were necessary.

- A disaggregation for EELs DS-1 was added to PO-5 in the FOC standard interval table and will be reported as part of the Unbundled Loops and Specified Unbundled Network Elements product category, just as it is in Colorado.
- Three disaggregations were added to OP-3, each with a standard of 90%: DS-0, DS-1 and DS-3. This is because OP-3 currently reports EELs at an aggregate level (including DS-0, DS-1, and DS-3) with a standard of 90%. Because EELs are reported at the aggregate level with a standard of 90%, each disaggregation is assigned the applicable standard of 90%.
- These same three disaggregations are already contained in OP-5 by agreement of the LTPA reached in August, 2003; therefore, no additional change was necessary.
- These same three disaggregations were added to OP-4, OP-6A, MR-5, MR-6, MR-7 and MR-8 but with a diagnostic standard applying to DS-0 and DS-3 levels and a benchmark or parity standard applying to the DS-1 level. This is because, similar to OP-3, these PIDs currently report EELs at an aggregate level but with a diagnostic standard. Therefore, the DS-0 and DS-3 levels retain the diagnostic standard while the DS-1 level takes on the benchmark or parity standard in order to bring the CPAP requirements into the Washington PAP.

2. The agreed administrative changes were made only to increase the clarity, accuracy, and completeness of the PIDS, but not to change the meaning of any PID. Specifically, they correct typographical errors, update outdated information and make certain terms and phrases consistent throughout the PIDs.
3. As a substantive agreed modification, PID GA-1 has been changed to reflect the retirement of two interface components, Fetch-N-Stuff (GA-1B) and Data Arbiter (GA-1C). They have been replaced with one interface component, SIA (GA-1D), which facilitates access for the IMA-GUI interface and the IMA-EDI interface, and reports the percentage of scheduled time the SIA system is available. Therefore, GA-1D replaces both GA-1B and GA-1C.
4. Both the administrative changes and the more substantive changes to GA-1 were discussed by the LTPA participants on December 4<sup>th</sup> and 11<sup>th</sup>, 2003, and finally approved on December 18<sup>th</sup>, 2003. A number of Staff from various state commissions attended those discussions as well.

#### REQUESTED RELIEF

Qwest respectfully requests that the Commission permit the amended Exhibit B to go into effect no later than 60 days after submission in accordance with 47 U.S.C. § 252(f)(3). Qwest further requests that the Commission deem this revised Exhibit B to modify the SGAT and existing interconnection agreements that currently contain the PIDs as an exhibit.

With this notice and pursuant to section 16 of the QPAP, Qwest has also modified Exhibit K, to reflect the changes described above. Attached are a red-lined Exhibit K and a clean Exhibit K for the convenience of the Commission.

Qwest submits this notice in the two dockets captioned above. By submission pursuant to section 16 of Exhibit K, the changes shall automatically apply to and modify all existing interconnection agreements that currently contain Exhibit K, the QPAP, as an exhibit.

Respectfully submitted this 17<sup>th</sup> day of February, 2004

QWEST CORPORATION

LAW OFFICES OF DOUGLAS N. OWENS

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