



*William E. Hendricks III
Attorney
902 Wasco Street
Hood River, OR 97031
541.387.9439 (phone)
541.387.9753 (fax)
tre.e.hendricks.iii@mail.sprint.com*

October 21, 2003

Carole Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-8002

VIA E-MAIL

Re: Washington Docket No. UT 033025

Dear Ms. Washburn:

Enclosed, please find Comments of Sprint Regarding Batch Hot Cut Process in the above referenced docket.

If you have any questions, please do not hesitate to contact me at 541.387.9439.

Sincerely,

A handwritten signature in black ink, appearing to read "W. E. Hendricks, III". The signature is stylized and cursive.

William E. Hendricks, III

WEH/sm
Enclosure
c. service list

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

In the Matter of)	DOCKET NO. UT-033025
)	
The Implementation of the Federal Communication Commission's Triennial Review Order)	COMMENTS OF SPRINT REGARDING BATCH HOT CUT PROCESS
)	
.....)	

1. United Telephone Company of the Northwest d/b/a Sprint ("Sprint") offers these comments in response to the Commission's October 14, 2003 Notice of Opportunity to File Comments related to the current batch hot cut processes used to transfer a loop from one carrier's switch to another carrier's switch. In the event that the Commission seeks to establish a batch cut process for other ILECs, Sprint asserts that one is not necessary in Sprint's service territories because Sprint does not currently provision UNE-P to any CLEC's, provisions very low volumes of UNE loops, and has a process that is more than sufficient to address current and any potential future demand.

2. This matter arises from the FCC's finding in its Triennial Review Order ("TR Order")¹ that the operational and economic factors related to the current hot cut processes serve as a barrier to competitive entry in the absence of unbundled switching. In light of this finding, the FCC required state commissions to, within nine months from the effective date of the TR Order, approve and implement a batch cut process that will render the hot cut processes more efficient and reduce per-line hot cut costs. Alternatively, state commissions must issue detailed

¹ *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers. Implementation of the Local competition Provisions of the Telecommunications Act of 1996. Deployment of Wireline Services Offering Advanced Telecommunications Capability.* CC Docket No. 01-338, CC Docket No. 96-98, CC Docket No. 98-147; Report and Order and Order on Remand and Further Notice of proposed Rulemaking, released August 21, 2003.

findings to support a conclusion that the current hot cut processes do not give rise to impairment in a market and that a batch cut process is therefore unnecessary.²

3. Sprint's operational loop conversion, or "hot cut" process, for either coordinated or uncoordinated cuts is designed to efficiently migrate an existing Sprint customer to another local service provider ("LSP"). Under this process, an LSP submits a Local Service Request ("LSR") via a web-based order entry system called IRES (Integrated Request Entry System) requesting either a coordinated or uncoordinated conversion. Sprint's National CLEC Provisioning Center ("MCPC") utilizes a scheduling tool to enter and track Sprint's internal activities through the completion of the order as follows:

Coordinated Hot Cut. Sprint defines a Coordinated Hot Cut as a combined effort between a new LSP and Sprint to simultaneously perform the loop conversion.

- Prior to the due date as requested by the new LSP on the initial order, the Sprint NCPC Associate will contact internal Sprint personnel to review the conversion request, establish contact names and numbers, and assign responsibilities.
- The new LSP must contact the NCPC at least 48 hours prior to the due date to confirm the conversion and the establishment of dial tone in their switch. The NCPC Associate will update the order and work scheduler with the proposed date and time of the conversion.
- Prior to the conversion date the Sprint Central Office (CO) Technician will pre-run jumpers from the Sprint main distribution frame to the new LSP's block and pin, verify correct assignment and test for dial tone on the LSP's block and pin.

² See TR Order, at ¶ 460.

- On the conversion date and at the specified time, the NCPC Associate will initiate a conference call to all involved Sprint personnel and the new LSP to begin the conversion process. All Sprint personnel and the new LSP will remain in contact on the conference call for the duration of the conversion.
- As the new LSP provisions service on their switch, the Sprint CO Technician terminates the jumpers to the appropriate block and pin.
- Upon completion of the conversion, the new LSP will send a notice to the NPAC to activate LNP. Sprint Local will remove the ported number from their switch once the conversion is completed.

Uncoordinated Hot Cut. If the new LSP utilizes the 10-digit trigger in their switch, a simultaneous and coordinated loop conversion is not required.

- The new LSP will activate the 10-digit trigger in their switch 24 hours prior to the conversion due date.
- Prior to the conversion date, the Sprint CO Technician will pre-run jumpers from the Sprint main distribution frame to the new LSP block and pin, verify correct assignment and test for dial tone on the LSP's block and pin.
- On the conversion date, the Sprint CO Technician will contact the NCPC when the conversion process is ready to begin, tie down the jumpers to the appropriate block and pin, and then contact the NCPC when the work is completed.
- The Sprint NCPC Associate will then notify the new LSP that the conversion is completed. The NCPC Associate will also remove the ported number from the switch.

- The new LSP will send a notice to the NPAC to activate LNP and will remove the 10-digit trigger from their switch.

4. Sprint's process is more than sufficient to efficiently process current and future CLEC demand for hot cuts. In fact, Sprint currently has no CLEC customers purchasing UNE-P service and currently provisions only 21 unbundled loops to CLECs in its service territory in Washington. Sprint's existing process can accommodate increases in the level of demand for hot cuts, if such increased demand occurs. Therefore, there is no need for the Commission to define a batch hot cut process for Sprint as existing processes are sufficient and are not a cause of impairment in Sprint's markets. Defining a different process at this time for Sprint's service territory in Washington would be premature and an inefficient use of the Commission's and Sprint's resources. However, in the event that the Commission determines it should implement batch cut processes for other ILECs, such processes must be market and carrier specific.

Respectfully submitted this 21st day of October 2003.

By: 

William E. Hendricks III
WSBA No. 29786
902 Wasco Street
Hood River, OR 97031
(541) 387-9439

Attorney for Sprint

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION
DOCKET NO UT 033025
CERTIFICATE OF SERVICE**

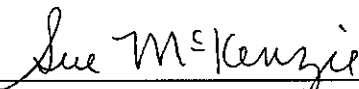
I certify that Comments of Sprint Regarding Batch Hot Cut Process in the above referenced docket were sent via e-mail on October 21, 2003 to

Carole Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-8002

and via e-mail to all parties on the attached Appendix A.

And a true and correct copy was delivered as set forth in the Appendix A, on the 21st day of October 2003.

DATED: October 21, 2003.



Sue McKenzie, Gov't Affairs Assistant

APPENDIX A

<u>PARTIES REPRESENTATIVES</u>				
DOCKET NO. UT-033025			Updated 10/6/03	
COMPANY	REPRESENTATIVE AND ADDRESS	PHONE NUMBER	FAX NUMBER	E-MAIL ADDRESS
Allegiance Telecom of Washington, Inc.	<i>(Paper & Fax Service)</i> JEFFREY J. BINDER Allegiance Telecom, Inc. 1919 M Street – Suite 420 Washington, DC 20036	202-464-1792	202-464-0762	Jeff.binder@algx.com
	<i>(E-mail service only)</i> MARK A STACHIW Allegiance Telecom, Inc. North Central Expressway Dallas, TX 75231	469-259-2099	469-259-9122	Mark.stachiw@algx.com
AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services (TCG Seattle and TCG Oregon)	<i>(Paper & Fax Service)</i> REBECCA DECOOK AT&T Law Department 1875 Lawrence Street Suite 1575 Denver, CO 80202	303-298-06357	303-298-6301	decook@att.com
	<i>(E-mail Service Only)</i> CATHY L. BRIGHTWELL MARY M. TAYLOR 2120 Caton Way SW, Suite B Olympia, WA 98502-1106	360-705-3977 360-705-3677	360-705-4177 (Same)	brightwell@att.com marymtaylor@att.com
	ADAM WALCZAK			awalczak@att.com
Covad Communications Company	<i>(Paper & Fax Service)</i> BROOKS E. HARLOW Miller Nash LLP 440 Two Union Square 601 Union Street Seattle, WA 98101	206-777-7424	206-622-7485	brooks.Harlow@millernash.com
	<i>(E-mail Service Only)</i> DAVID L. RICE Miller Nash LLP 440 Two Union Square 601 Union Street Seattle, WA 98101	206-622-8484	206-622-7485	david.rice@millernash.com

<p>Covad Communications Company</p>	<p><i>(E-mail Service Only)</i> KAREN S. FRAME Senior Counsel Covad Communications Company 7901 Lawry Blvd. Denver, CO 80230</p>	<p>720-208-1069</p>	<p>720-208-3350</p>	<p>kframe@covad.com</p>
<p>Department of Defense and All Other Federal Agencies</p>	<p><i>(Paper & Fax Service)</i> STEPHEN S. MELNIKOFF General Attorney Regulatory Law Office US Army Litigation Center 901 N. Stuart Street, Suite 700 Arlington, VA 22203-1837</p> <p><i>(E-mail Only)</i> ROBERT W. SPANGLER</p>	<p>703-696-1643</p>	<p>703-696-2960</p>	<p>Stephen.melnikoff@hqda.army.mil</p> <p>rspangler@snavely-king.com</p>
<p>Eschelon Telecom, Inc.</p>	<p><i>(Paper & Fax Service)</i> MARK TRINCHERO Davis Wright Tremaine LLP Suite 2300 First Interstate Tower 1300 SW Fifth Avenue Portland, OR 97201</p> <p><i>(E-mail Service Only)</i> J. JEFFREY OXLEY Executive Vice President & General Counsel Eschelon Telecom Inc. 730 Second Avenue South Suite 1200 Minneapolis, MN 55402- 2456</p> <p>DENNIS D. AHLERS Senior Attorney Eschelon Telecom Inc. 730 Second Avenue South Suite 1200 Minneapolis, MN 55402- 2456</p>	<p>503-778-5318</p> <p>612-436-6692</p> <p>612-436-6249</p>	<p>503-778-5299</p> <p>612-436-6792</p> <p>612-436-6349</p>	<p>marktrincher@dwt.com</p> <p>jjoxley@eschelon.com</p> <p>ddahlers@eschelon.com</p>

<p>Global Crossing Local Services, Inc.</p>	<p><i>(Paper & Fax Service)</i> MARK TRINCHERO Davis Wright Tremaine LLP Suite 2300 First Interstate Tower 1200 SW Fifth Avenue Portland, OR 97201 <i>(E-mail only)</i> MICHAEL SHORTLEY DIANE PETERS</p>	<p>503-778-5318</p>	<p>503-778-5299</p>	<p>marktrincherodwt.com Michael.shortly@globalcrossing.com diane.peters@globalcrossing.com</p>
<p>Integra TelCom, Inc.</p>	<p><i>(Paper & Fax Service)</i> MARK TRINCHERO Davis Wright Termaine LLP Suite 2300 First Interstate Tower 1200 SW Fifth Avenue Portland, OR 97201 <i>(E-mail Service Only)</i> KAREN JOHNSON DEBORAH HARWOOD</p>	<p>503-778-5318</p>	<p>503-778-5299</p>	<p>marktrincherodwt.com karen.johnson@integratelecom.com dharwood@integratelecom.com</p>
<p>McLeod Local Services, Inc.</p>	<p><i>(Paper & Fax Service)</i> MARK TRINCHERO Davis Wright Tremaine LLP Suite 2300 First Interstate Tower 1300 SW Fifth Avenue Portland, OR 97201 <i>(E-mail only)</i> WILLIAM HAAS WILLIAM COURTER</p>	<p>503-778-5318</p>	<p>503-778-5299</p>	<p>marktrincherodwt.com whaas@mcleodusa.com wcourter@mcleodusa.com</p>

<p>WorldCom, Inc., d/b/a/ MCI Inc.</p>	<p><i>(Paper & Fax Service)</i> MICHEL SINGER NELSON MCI Inc. 707 17th Street Suite 4200 Denver, CO 80202</p>	<p>303-390-6106</p>	<p>303-390-6333</p>	<p>michel.singer_nelson@mci.com</p>
<p>Northwest Competitive Communications Coalition</p>	<p><i>(Paper & Fax Service)</i> BROOKS E. HARLOW Miller Nash LLP 440 Two Union Square 601 Union Street Seattle, WA 98101</p> <p><i>(E-mail Service Only)</i> DAVID L. RICE Miller Nash LLP 440 Two Union Square 601 Union Street Seattle, WA 98101</p> <p>ANDREW O. ISAR Miller Isar, Inc. 7901 Skansie Avenue Suite 240 Gig Harbor, WA 98335</p>	<p>206-622-8484</p> <p>206-777-7424</p> <p>253-851-6700</p>	<p>206-622-7485</p> <p>206-622-7485</p> <p>253-851-6474</p>	<p>brooks.harlow@millernash.com</p> <p>david.rice@millernash.com</p> <p>aisar@millerisar.com</p>
<p>PacWest Telecom, Inc.</p>	<p><i>(Paper & Fax Service)</i> MARK TRINCHERO Davis Wright Tremaine LLP Suite 2300 First Interstate Tower 1300 SW Fifth Avenue Portland, OR 97201</p> <p><i>(E-mail Service Only)</i> ETHAN SPRAGUE</p>	<p>503-778-5318</p>	<p>503-778-5299</p>	<p>marktrinchero@dwt.com</p> <p>esprague@pacwest.com</p>

<p>Qwest Corporation</p>	<p><i>(Paper & Fax Service)</i> LISA A. ANDERL Qwest Corporation 1600 7th Avenue Room 3206 Seattle, WA 98191</p> <p><i>(E-mail Service Only)</i> ADAM L. SHERR MARK REYNOLDS Qwest Corporation 1600 7th Avenue Room 3206 Seattle, WA 98191</p>	<p>206-345-1574</p> <p>206-398-2507 206-345-1568</p>	<p>206-343-4040</p> <p>206-343-4040 (Same)</p>	<p>Lisa.Anderl@qwest.com</p> <p>Adam.sherr@qwest.com Mark.Reynolds3@qwest.com</p>
<p>Qwest Corporation</p>	<p><i>(E-mail Service Only)</i> CHUCK STEESE Steese & Evans 6400 S. Fiddler's Green Circle, Suite 1820 Denver, CO 80111</p>	<p>720-200-0677</p>	<p>720-200-0697</p>	<p>csteese@s-elaw.com</p>
<p>Sprint Corporation</p>	<p><i>(Paper & Fax Service)</i> WILLIAM E. HENDRICKS III Attorney – Sprint Corp. 902 Wasco Street Hood River, OR 97031</p>	<p>541-387-9439</p>	<p>541-387-9753</p>	<p>Tre.e.Hendricks.iii@mail.sprint.com</p>
<p>Time Warner Telecom of Washington, LLP</p>	<p><i>(Paper & Fax Service)</i> MARK TRINCHERO Davis Wright Tremaine LLP Suite 2300 First Interstate Tower 1300 SW Fifth Avenue Portland, OR 98201</p> <p><i>(E-mail Service Only)</i> BRIAN THOMAS</p>	<p>503-778-5318</p> <p>206-676-8090</p>	<p>503-778-5299</p> <p>206-676-8001</p>	<p>marktrinchero@dwt.com</p> <p>Brian.Thomas@twtelecom.com</p>

Verizon Northwest Inc.	<i>(Paper & Fax Service)</i> TIMOTHY O'CONNELL Stoel Rives LLP 600 Union Street Suite 3600 Seattle, WA 98101	206-386-7562	206-386-7500	tjoconnell@stoel.com
	<i>(E-Mail Service Only)</i> KENDALL FISHER Stoel Rives LLP 600 Union Street Suite 3600 Seattle, WA 98101	206-386-7526	206-386-7500	kfisher@stoel.com
	JOAN M. GAGE 1800 41 st Street PO Box 1003 Everett, WA 98201	425-261-5238	425-261-5262	Joan.gage@verizon.com
	KIMBERLY A. DOUGLASS RICHARD POTTER			Kimberly.a.douglass@verizon.com Richard.potter@verizon.com
WeBTEC	<i>(Paper & Fax Service)</i> ARTHUR A. BUTLER Ater Wynne LLP 601 Union Street Suite 5450 Seattle, WA 98101-2327	206-623-4711	206-467-8406	aab@aterwynne.com
	<i>(E-mail Service Only)</i> LISA RACKNER 222 SW Columbia Portland, OR 97201	503-226-1191	503-226-0079	lfr@aterwynne.com
XO Communications Inc.	<i>(Paper & Fax Service)</i> MARK TRINCHERO Davis Wright Termaine LLP First Interstate Tower Suite 2300 1300 SW Fifth Avenue Portland, OR 97201 <i>(E-mail Service Only)</i> REX KNOWLES	503-778-5318	503-778-5299	marktrinchero@dwt.com Rex.Knowles@xo.com

Public Counsel	<i>(Paper & Fax Service)</i> SIMON J. FFITCH Assistant Attorney General Public Counsel Section 900 4 th Avenue Suite 2000 Seattle, WA 98164-1012	206-464-2055	206-389-2058	simonf@atg.wa.gov
Commission Staff	<i>(Paper & Fax Service)</i> JONATHAN THOMPSON Asst. Attorney General 1400 S Evergreen Park Drive SW PO Box 40128 Olympia, WA 98504-0128	360-664-1225	360-586-5522	jthompso@wutc.wa.gov
Presiding Administrative Law Judge	ANN E. RENDAHL 1300 S. Evergreen Park Dr SW PO Box 47250 Olympia, WA 98504-7250	360-664-1144	360-664-2654 (ALD fax only - do not use to file)	arendahl@wutc.wa.gov