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**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation Into  
U S WEST COMMUNICATIONS, INC.'s  
COMPLIANCE WITH SECTION 271 OF  
THE TELECOMMUNICATIONS ACT OF  
1996.

Docket No. UT-003022 and UT-003040  
COVAD COMMUNICATIONS  
COMPANY'S MOTION FOR  
EXTENSION OF TIME TO FILE  
COMMENTS ON QWEST'S CHANGE  
MANAGEMENT PROCESS

Covad Communications Company ("Covad") hereby submits this Motion for Extension of Time to File Comments on Qwest's Change Management Process. As grounds in support of this Motion, Covad states as follows:

1. In June 2001, Qwest announced that it would "redesign" its systems, product and process change management process ("CMP") to respond to issues raised by CLECs and the OSS third party testers during the course of the Section 271 workshops and OSS testing taking place throughout the Qwest region. Accordingly, in July 2001, the parties to the Section 271 proceedings in this State (as well as the other states in the Qwest region) agreed to take change management out of the workshops and to undertake the change management redesign within the CMP itself.

2. As Qwest correctly points out in its March 15, 2002 Change Management Status Report, the parties have spent an extensive amount of time working on the redesign of the CMP. Further, the parties recently agreed to proceed on an expedited basis to resolve, in both principle and in detail, the critical issues that CLECs have identified as requiring resolution before Qwest may be deemed to have a Section 271-compliant CMP. More particularly, (a) CLECs have

1 identified a list of issues that must be addressed in order to resolve the CLECs' Section 271-  
2 based concerns regarding Qwest's CMP; (b) the parties have prioritized those issues according to  
3 level of importance; (c) the parties have agreed to reach an agreement in principle on how to  
4 resolve each issue addressed; and (d) the parties then agreed to draft language reflecting and  
5 implementing the agreed upon concepts. Finally, the parties agreed that, for all the issues  
6 identified by CLECs on which consensus had not been reached and/or officially closed, they  
7 would file on April 8, 2002 their impasse briefs on these issues with the Arizona and Colorado  
8 commissions for resolution. Covad, as well as other parties, are optimistic that many, if not all,  
9 of these issues can be resolved prior to the April 8, 2002 filing.

10 3. In light of the schedule and process by which the parties to the CMP redesign  
11 effort have agreed to develop and submit for resolution the significant remaining CMP Redesign  
12 issues that impact Qwest's Section 271 application, Covad believes that the parties and the  
13 Commission are best served by extending the deadline for the filing of CLEC  
14 comments/responses to Qwest's March 15, 2002 CMP filing to April 8, 2002. Extending the  
15 deadline would permit more narrowly refined and tailored CMP filings by CLECs only on those  
16 issues that still remain, thereby limiting the amount of time and resources the Commission would  
17 be required to expend on change management issues. Conversely, by not extending the deadline,  
18 the parties may brief issues that ultimately do not require Commission attention or resolution.  
19 Accordingly, Covad respectfully requests that the deadline for the filing of CLEC responsive  
20 CMP comments be extended to April 8, 2002.

21 4. Counsel for Covad has discussed this Motion with Qwest, AT&T and WorldCom.  
22 Counsel for Covad is authorized to represent that none of these parties object to the extension of  
23 the deadline for the filing of CLEC responsive comments to April 8, 2002. Further, with respect  
24 to the Qwest rebuttal testimony/comments, counsel for Covad is authorized to represent that  
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**CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of the foregoing on the following:

*Please see attached Service List*

by the following indicated method or methods:

- By **faxing** full, true, and correct copies thereof to the attorneys at the fax numbers shown above, which are the last-known fax numbers for the attorneys' offices, on the date set forth below. The receiving fax machines were operating at the time of service and the transmissions were properly completed, according to the attached confirmation reports.
- By **mailing** full, true, and correct copies thereof in sealed, first-class postage-prepaid envelopes, addressed to the attorneys as shown above, the last-known office addresses of the attorneys, and deposited with the United States Postal Service at Seattle, Washington, on the date set forth below.
- By sending full, true and correct copies thereof via **overnight courier** in sealed, prepaid envelopes, addressed to the attorneys as shown above, the last-known office addresses of the attorneys, on the date set forth below.
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- By **e-mailing** to the e-mail addresses as noted on attached service list

**Those parties marked with an asterisk were sent a confidential copy via U.S. Mail.**

DATED this 20th day of March, 2002.

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Adrienne M. Anderson

**SERVICE LIST**  
**DOCKET NO. UT-003022**

1  
2  
3 Lisa Anderl\*  
4 Qwest  
5 1600 7<sup>th</sup> Avenue, Rm. 3206  
6 Seattle, WA 98101  
7 PH: (206) 345-1574  
8 FX: (206) 343-4040  
9 e-mail: [landerl@qwest.com](mailto:landerl@qwest.com)

Dennis Ahlers, Senior Attorney\*  
Eschelon Telecom, Inc.  
730 Second Avenue S., Suite 1200  
Minneapolis, MN 55402  
PH: (612) 436-6249  
FX: (612) 376-4411  
e-mail: [ddahlers@eschelon.com](mailto:ddahlers@eschelon.com)

8 Robert E. Cattanach\*  
9 Dorsey & Whitney, LLP  
10 Pillsbury Center South  
11 220 South Sixth Street  
12 Minneapolis, MN 55402  
13 PH: (612) 340-2873  
14 FX: (612) 340-2807  
15 e-mail: [cattanach.robert@dorseylaw.com](mailto:cattanach.robert@dorseylaw.com)

Arthur A. Butler\*  
Ater Wynne  
5450 Two Union Square  
601 Union Street  
Seattle, WA 98101-2327  
PH: (206) 623-4711  
FX: (206) 467-8406  
e-mail: [aab@aterwynne.com](mailto:aab@aterwynne.com)

13 K. Megan Doberneck\*  
14 Covad Communications Company  
15 7901 Lowry Boulevard  
16 Denver, CO 80230  
17 PH: (720) 208-3636  
18 FX: (720) 208-3256  
19 e-mail: [mdoberne@covad.com](mailto:mdoberne@covad.com)

Eric S. Heath\*  
Sprint  
MS: NVLSVB0207  
330 S. Valley View Blvd.  
Las Vegas, NV 89107  
PH: (702) 244-6541  
FX: (702) 244-7380  
e-mail: [eric.s.heath@mail.sprint.com](mailto:eric.s.heath@mail.sprint.com)

19 Michel Singer Nelson  
20 WorldCom, Inc.  
21 707 17<sup>th</sup> Street, Suite 4200  
22 Denver, CO 80202  
23 PH: (303) 390-6106  
24 FX: (303) 390-6333  
25 e-mail: [michel.singer\\_nelson@wcom.com](mailto:michel.singer_nelson@wcom.com)

Gregory J. Kopta\*  
Davis Wright Tremaine  
2600 Century Square, 1501 Fourth Avenue  
Seattle, WA 98101-1688  
PH: (206) 622-3150  
FX: (206) 628-7699  
e-mail: [gregKopta@dwt.com](mailto:gregKopta@dwt.com)

1 Mary B. Tribby\*  
2 AT&T Law Department  
3 1875 Lawrence St., Suite 1500  
4 Denver, CO 80202  
5 PH: (303) 298-6508  
6 FX: (303) 298-6301  
7 e-mail: [mbtribby@att.com](mailto:mbtribby@att.com)

Shannon Smith  
Assistant Attorney General  
Attorney General's Office  
1400 South Evergreen Park Dr., SW  
P. O. Box 40128  
Olympia, WA 98504-0128  
PH: (360) 664-1192  
FX: (360) 586-5522  
e-mail: [ssmith@wutc.wa.gov](mailto:ssmith@wutc.wa.gov)

7 Robert Cromwell\*  
8 Assistant Attorney General  
9 Public Counsel  
10 900 4<sup>th</sup> Avenue, Suite 2000  
11 Seattle, WA 98164  
12 PH: (206) 389-2055  
13 FX: (206) 389-2058  
14 e-mail: [robertc1@atg.wa.gov](mailto:robertc1@atg.wa.gov)

Martha Allbright  
Mpower Communications Corp.  
5711 So. Benton Cr.  
Littleton, CO 80123  
PH: (716) 218-6556  
FX: (716) 218-0165  
e-mail: [mallbright@mpowercom.com](mailto:mallbright@mpowercom.com)

12 Michael B. Hazzard  
13 Kelley Drye & Warren, LLP  
14 Representing Z-Tel Communications  
15 1200 19<sup>th</sup> Street, NW, Fl. 5  
16 Washington, D.C. 20036  
17 PH: (703) 918-2316  
18 FX: (703) 918-2450  
19 e-mail: [mhazzard@kelleydrye.com](mailto:mhazzard@kelleydrye.com)

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18  
19  
20  
21  
22  
23  
24  
25  
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