

Docket Nos. UT-003022/003040

Qwest's Compliance with Commission Orders

ORDERING PARAGRAPH	DESCRIPTION OF COMPLIANCE ISSUE	SGAT FOURTH REVISION 4/5/2002 COMPLIANCE CITE
	Reconsideration	
25 th Supp. Order on Reconsideration, Workshop 1 At 65	Qwest must modify SGAT section 7.3.4.2.1 to reflect that a terminating party need only demonstrate that its switch serves a geographic area comparable to that of Qwest's tandem switch to receive the tandem switching rate and tandem transmission rate in addition to the end office termination rate.	7.3.4.2.1 previously modified
25 th Supp. Order on Reconsideration, Workshop 1 At 66	Qwest must also modify SGAT section 4.1.1.2 to delete the word "actually."	"Actually" previously deleted. See Section 4; "Central Office Switch"; "Tandem Office Switches."
26 th Supp. Order on Reconsideration, Workshop 2 At 41	Qwest must modify its SGAT, including section 7.3.1.1.2, to apply proportional rates to CLECs using facilities for both interconnection and special access service, i.e., apply TELRIC rates to the portion used for interconnection and private line tariff rates for the portion used for special access.	7.3.1.1.2
26 th Supp. Order on Reconsideration, Workshop 2 At 42	Qwest must publish its standard Centrex Prime prices in its tariff or price list containing the terms and conditions of Centrex Prime service.	Filed with 10/1/2001-compliance filing.
	Unbundled Network Elements	
24th Supp. Order, Final Order, Workshop 3 At 60	Qwest must revise its SGAT construction requirements to reflect the decision and requirements articulated in paragraph 267 of the 13 th Supplemental Order in this proceeding.	9.1.2.1, 9.1.2.1.3.1, 9.7.2.3, 9.23.1.4, 9.23.1.5, 9.23.1.6 and 9.23.3.7.2.12.8
24th Supp. Order, Final Order, Workshop 3 At 62	Qwest must revise SGAT section 9.1.2 to reflect the modified language stated in this Order at paragraph regarding retail service analogues.	9.1.2

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13th Supp. Order, Initial Order, Workshop 3 At 264	Qwest must not require CLECs to pay directly for regeneration required to provide UNEs. Qwest is entitled to recover regeneration costs indirectly across the pricing of all facilities, including its own.	9.1.4, 9.6.2.3 and 9.1.10
13th Supp. Order, Initial Order, Workshop 3 At 266	Qwest must provide either "light" or dark fiber, or must provide or modify electronics on fiber facilities, to provide additional capacity for UNEs in the same manner it would provide additional capacity for its own use.	9.6.2.6
13th Supp. Order, Initial Order, Workshop 3 At 269	Qwest may prohibit the connection of EELs to tariffed services only to the extent set forth in the FCC's Supplemental Clarification Order	Pending order on reconsideration.
13th Supp. Order, Initial Order, Workshop 3 At 270	Qwest is not required to waive termination liability assessments (TLAs) when converting special access or private line circuits to EELs. However, Qwest must offer to CLECs its proposed waiver of TLAs as outlined in its brief.	9.23.3.12
13th Supp. Order, Initial Order, Workshop 3 At 272	Qwest must modify its SGAT to add limitations on its ability to market its services to CLEC customers during misdirected calls.	9.23.3.17
Unbundled Transport		
13th Supp. Order, Initial Order, Workshop 3 At 273	Qwest must eliminate any distinctions between UDIT and EUDIT	9.6.1.1, 9.6.2.3, 9.6.2.4, 9.6.2.5, 9.6.2.6, 9.6.2.7, 9.6.3.1, 9.6.3.2, 9.6.3.3, 9.6.3.4, 9.6.3.5, 9.6.3.5.1, 9.6.4.1.1 and 9.6.6.1
13th Supp. Order, Initial Order, Workshop 3 At 274	Qwest must provision electronics at the CLEC end of unbundled dedicated transport if requested by the CLEC	9.1.2.1
Unbundled Local Switching		
13th Supp. Order, Initial Order, Workshop 3 At 276	Qwest must provide CLECs unbundled local switching at UNE prices when EELs are not available	9.11.2.5.3

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13th Supp. Order, Initial Order, Workshop 3 At 277	When determining whether the “four or more lines” exemption from providing unbundled local switching as a UNE applies, Qwest must count the lines by customer location, rather than by wire center.	9.11.2.5
13th Supp. Order, Initial Order, Workshop 3 At 278	Qwest is not required to price unbundled local switching in Density Zone 1 wire centers at TELRIC rates.	9.11.2.5.7

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	Unbundled Loops & Emerging Services	
28th Supp. Order, Final Order, Workshop 4 at 245	Qwest must revise its SGAT construction requirements to reflect the decision and requirements articulated in paragraph 48 of the <i>Initial Order</i> in this proceeding. Qwest must also modify the SGAT to provide a reference to a document available to CLECs outlining Qwest's terms and conditions for building facilities for retail customers.	9.1.2.1 and 9.1.2.1.5
28th Supp. Order, Final Order, Workshop 4 At 247	During the investigation, and until we resolve the issue, Qwest may not charge CLECs for removing load coil encumbrances of any type, or bridged taps not requiring construction or excavation, in the 47 central offices that are the subject of Qwest's commitment in the merger settlement. Pending a decision in the cost and pricing docket, UT-003013, Qwest may charge for loop conditioning, if requested by a CLEC, in central offices other than the 47 central offices affected by the <i>Merger Settlement Agreement</i> .	Qwest will comply.
28th Supp. Order, Final Order, Workshop 4 At 248	Qwest must modify the SGAT to provide CLECs a process for obtaining loop qualification information that is not available electronically.	9.2.2.8
28th Supp. Order, Final Order, Workshop 4 At 249	Qwest must modify its SGAT to allow CLECs to audit the loop qualification tools provided to them to determine whether the tools provide all the information required by the FCC.	Pending order on reconsideration.

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28th Supp. Order, Final Order, Workshop 4 At 251	Paragraph 110 of the <i>Initial Order</i> is modified to require Qwest to file a memorandum with the Commission specifying which of the FCC's requirements Qwest has met for deploying remote DSL technology in Washington state.	Qwest will file memorandum on April 11, 2002.
28th Supp. Order, Final Order, Workshop 4 At 252	Qwest must modify its SGAT consistent with paragraph 119 of the <i>Initial Order</i> , and modify SGAT section 9.2.6.4 to include its proposed language that would allow the Commission to resolve disputes concerning interference.	9.2.6.4
28th Supp. Order, Final Order, Workshop 4 At 253	Qwest must comply with paragraph 132 of the <i>Initial Order</i> , except that Qwest is not required to convert interoffice facilities it needs to maintain adequate reserve facilities.	9.1.2.1.3
28th Supp. Order, Final Order, Workshop 4 At 254	Consistent with our decision in the 24 th <i>Supplemental Order</i> , we adopt the recommendation in paragraph 145 of the <i>Initial Order</i> that Qwest modify SGAT section 9.7.2.9 to remove the local usage restriction on unbundled dark fiber.	Pending order on reconsideration.
28th Supp. Order, Final Order, Workshop 4 At 255	Qwest must offer access to dark fiber at splice points under a rebuttable presumption that such access is technically feasible, consistent with the recommendation in paragraph 11 of the 22 nd <i>Supplemental Order</i> .	9.7.2.2
28th Supp. Order, Final Order, Workshop 4 At 257	We reject the recommendation in paragraph 187 of the <i>Initial Order</i> , and direct Qwest to modify SGAT Exhibit C to include a three-day interval for provisioning line sharing.	Exhibit C- no change required.
28th Supp. Order, Final Order, Workshop 4 At 258	Qwest must replace SGAT section 9.4.1.1 as recommended in paragraph 199 of the <i>Initial Order</i> with the language set forth above in paragraph 70 of this Order.	9.4.1.1

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28th Supp. Order, Final Order, Workshop 4 At 259	Qwest must amend the SGAT to clarify that CLECs may either order the NID using SGAT section 9.5, and the subloop using section 9.3, or the NID/subloop combination using section 9.3. Qwest may amend the SGAT to prohibit CLECs from ordering subloops using SGAT section 9.5.	9.3 and 9.5
28th Supp. Order, Final Order, Workshop 4 At 260	Qwest must amend SGAT sections 9.5.2.1 and 9.5.2.5 as set forth above in paragraph 80 of this Order.	9.5.2.1 and 9.5.2.5
28th Supp. Order, Final Order, Workshop 4 At 262	Qwest must amend SGAT sections 9.3.3.5 and 9.3.5.4.1 to clearly identify the intervals for determining facility ownership, agreed to by the parties.	9.3.3.5 and 9.3.5.4.1
28th Supp. Order, Final Order, Workshop 4 At 263	Qwest must modify its SGAT to require LSRs for subloop orders. Qwest must file a status report with the Commission on its efforts to automate the LSR process within 30 days after the service date of this Order, and every 3 months thereafter until the process is fully automated.	Status report to be filed April 11, 2002 and every 3 months thereafter until the process is fully automated.
20th Supp. Order, Initial Order, Workshop 4 At 693	Qwest must change SGAT section 9.2.2.3.1 and Exhibit C to include intervals for high capacity loops other than ICB, only when Qwest establishes intervals for retail customers.	9.2.2.3.1
20th Supp. Order, Initial Order, Workshop 4 At 695	Qwest must make its credit proposal in SGAT section 9.2.2.4.1 immediate and must not administer it through the billing dispute process.	9.2.2.4.1
20th Supp. Order, Initial Order, Workshop 4 At 698	Qwest must modify SGAT section 9.1.2.1.3.2 to reflect that CLEC orders remain open or held pending availability of facilities at parity with retail customer orders. Qwest must also include all such orders in its performance measures on a consistent basis with retail held orders.	9.1.2.1.3.2. Held order metric to be considered after ROC, per Final Order at 250.

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20th Supp. Order, Initial Order, Workshop 4 At 699	Qwest and CLECs must share information about spectrum management as required by 47 C.F.R. §§ 51.231(a), (b), and (c), but Qwest may require the use of NC/NCI codes in LSRs only if the FCC adopts their use. Qwest must modify the SGAT as noted in this order to ensure that Qwest protects any information provided by CLECs, and that the information is not disclosed for any other Qwest purposes, either individually or in the aggregate.	9.2.6.2
20th Supp. Order, Initial Order, Workshop 4 At 699(2)	Qwest must modify SGAT sections 9.2.6.2, 9.2.6.7, 9.2.6.8, 9.2.6.9, and 9.2.6.4 as discussed above in this order to reflect information sharing with respect to spectrum management, the determination of deployment of advanced services, and how to address known disturbers in Qwest's network.	9.2.6.2, 9.2.6.7, 9.2.6.8, 9.2.6.9 and 9.2.6.4
20th Supp. Order, Initial Order, Workshop 4 At 704	Qwest must modify its SGAT to allow CLECs to order UNE-P voice service for Qwest's DSL customers.	9.23.3.11.7
20th Supp. Order, Initial Order, Workshop 4 At 706	Qwest must modify SGAT section 9.2.4.3.1 to address CLEC requests to place certain splitters on the MDF.	9.4.2.3.1 (9.2.4.3.1 in order was incorrect reference)
20th Supp. Order, Initial Order, Workshop 4 At 708	Qwest must modify its SGAT to allow line splitting on resold lines and other combinations to be offered through the SRP process.	9.24.1.1
20th Supp. Order, Initial Order, Workshop 4 At 716	Qwest must modify SGAT section 9.3.6.4.1 to reflect that it may not charge CLECs for Qwest's inventory costs	9.3.6.4.1 deleted
General Terms and Conditions		
28th Supp. Order, Final Order, Workshop 4 At 264	We affirm the recommendation in paragraph 322 of the <i>Initial Order</i> requiring Qwest to delete language in SGAT section 2.1.	2.1
28th Supp. Order, Final Order, Workshop 4 At 265	Qwest must modify SGAT section 5.8.1 to allow "other damages" to be limited to the annual charges under the agreement.	5.8.1

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28th Supp. Order, Final Order, Workshop 4 At 266	Qwest must modify SGAT section 5.8.4 consistent with the recommendations in paragraph 374 of the <i>Initial Order</i> .	5.8.4
28th Supp. Order, Final Order, Workshop 4 At 267	Qwest must modify the language in SGAT section 5.9.1.2 appearing in Exhibit 1170 as described above in paragraph 121 of this Order.	5.9.1.2
28th Supp. Order, Final Order, Workshop 4 At 268	Qwest must modify SGAT sections 18.1.1 and 18.1.2 to expand the scope of audits as recommended in paragraph 446 of the <i>Initial Order</i> .	18.1.1 and 18.1.2
20th Supp. Order, Initial Order, Workshop 4 At 717	Qwest must file new product offerings with the Commission as SGAT amendments at the time they are offered to CLECs.	Qwest will comply.
20th Supp. Order, Initial Order, Workshop 4 At 718	Qwest must modify SGAT section 1.8 to include the following language: Nothing in this SGAT shall preclude a CLEC from opting into specific provisions of an agreement or of an entire agreement, solely because such provision or agreement itself resulted from an opting in by a CLEC that is a party to it.	1.8.2.1
20th Supp. Order, Initial Order, Workshop 4 At 719	Qwest must delete all language in SGAT section 2.1 beginning with the fourth sentence that begins, "Unless the context shall otherwise require."	2.1
20th Supp. Order, Initial Order, Workshop 4 At 720	Qwest must modify SGAT section 2.2 to retain the last sentence of the section and delete all text after "this Agreement" in the fourth to last sentence.	2.2
20th Supp. Order, Initial Order, Workshop 4 At 721	Qwest must delete the opening clause of SGAT section 2.3, "Unless otherwise specifically determined by the Commission."	2.3
20th Supp. Order, Initial Order, Workshop 4 At 722	Qwest must delete SGAT section 2.3.1 as redundant.	2.3.1 deleted.

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20th Supp. Order, Initial Order, Workshop 4 At 724	Qwest must modify SGAT section 5.8.4 to include AT&T's proposed language	5.8.4
20th Supp. Order, Initial Order, Workshop 4 At 725	Qwest must delete SGAT section 5.8.6	5.8.6 deleted.
20th Supp. Order, Initial Order, Workshop 4 At 727	Qwest must either make language in SGAT sections 7.2.2.8.1.2, 8.4.1.4.1, and 5.16.9 identical, or consolidate in one section the language concerning nondisclosure of CLEC forecast information.	5.16.9.1.1 deleted; Consolidated in 8.4.1.4.1
20th Supp. Order, Initial Order, Workshop 4 At 728	Qwest must delete SGAT section 5.16.9.1.1 allowing Qwest to aggregate CLEC confidential forecast information and use it for unrelated regulatory activities.	5.16.9.1.1 deleted.
20th Supp. Order, Initial Order, Workshop 4 At 729	Qwest must amend SGAT section 17.12 to provide notice to CLECs of all BFRs that have been deployed or denied. Qwest must exclude from this list any identifying information such as the name of the requesting CLEC and the location of the request.	17.12
20th Supp. Order, Initial Order, Workshop 4 At 730	Qwest must modify Exhibit F of the SGAT to allow CLECs to use the SRP process for all services and products for which Qwest has no product offering, and for which there is no need to test for technical feasibility.	Exhibit F modified
20th Supp. Order, Initial Order, Workshop 4 At 733	Qwest must modify SGAT sections 6.4.1 and 12.3.8.1.5 to include language required by this Commission in paragraph 96 of the Fifteenth Supplemental Order.	6.4.1 and 12.3.8.1.5
	Section 272	
28th Supp. Order, Final Order, Workshop 4 At 272	Qwest must provide the Commission, within 30 days of the service date of this order, detailed information concerning the merger of LCI into QCC to allow the Commission to assess the impact of the merger on QCC.	Qwest will provide the information on April 11, 2002.

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20th Supp. Order, Initial Order, Workshop 4 At 735	Qwest must provide further evidence, through testing by an independent body, to support its claim that its transactions with its section 272 affiliates comply with the FCC's rules. Any independent evaluation of Qwest's and QCC's transactions for compliance with GAAP must be based on the universe of those transactions, rather than on a larger universe of transactions.	Admitted to record January 10, 2002. Final Order at paragraphs 135 and 152.
20th Supp. Order, Initial Order, Workshop 4 At 736	Qwest must remove from its confidentiality agreement a restriction prohibiting parties who review detailed billing information related to Qwest's agreements with section 272 affiliates information from disclosing possible violations of section 272 requirements to regulators.	Restriction removed; Final order at paragraph 157.