

UT-043007 Smith Direct  
 Eschelon Telecom, Inc. July 23, 2004  
 Exhibit No. \_\_\_\_\_ (RJS-27T)

Federal Communications Commission

on August 17, 2002.<sup>369</sup> Qwest states that this enhancement addresses two of the most common errors that Qwest has found to affect its service order accuracy.<sup>370</sup> The system change implements edits at the point the FOC is being created by the service delivery coordinator (SDC).<sup>371</sup> First, the fix will require the purchase order number on the service order to match the LSR.<sup>372</sup> Second, the system flags for the SDC any differences between the due date on the LSR and the due date on the service order.

101. In reaching our conclusions, we note that the Department of Justice observed that the record demonstrates improvement with respect to manual order processing.<sup>373</sup> The Department of Justice also stated that "Qwest's fulfillment of its commitments to maintain as well as improve the accuracy of its service order processing deserves close monitoring, and its continued collection and reporting on this process will be critical to ensure the adequacy of its post-entry performance."<sup>374</sup> With respect to this observation, we note that Qwest filed a commitment to incorporate PO-20, one of its service order accuracy metrics, into its PAP on a regionwide basis.<sup>375</sup> Although we do not rely on this commitment, we find that Qwest's obligation to make payments on PO-20, based on a benchmark of 95 percent accuracy, which will become effective at the same time as the PAP, responds to the concerns expressed in the

<sup>369</sup> Qwest Aug. 8 *Ex Parte* Letter at 5.

<sup>370</sup> *Id.*

<sup>371</sup> *Id.* Qwest explains that the system retrieves all service orders that contain the purchase order number (PON) for which the SDC is creating the FOC. The system will display the service order numbers and their associated due dates. The SDC can then select the correct order to associate with each line on the FOC. If the SDC does not see all the orders he/she has created for this LSR, the SDC will go back into the SOP and review and correct the order(s) that does not have the appropriate PON. This will allow the SDC to continue with the creation of the FOC.

<sup>372</sup> *Id.*

<sup>373</sup> Department of Justice Qwest III Evaluation at 4.

<sup>374</sup> *Id.* at 6.

<sup>375</sup> See Letter from Yaron Dori, Counsel for Qwest, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 02-148, 02-189, at 1-2 (filed Aug. 9, 2002) (Qwest Aug. 9b *Ex Parte* Letter) (advising the Commission that it will file requests with the regulatory authorities in each of the nine states for which Qwest has pending section 271 applications asking that each authority include PO-20 in its PAP). Qwest has proposed to include these payments as a Tier 2 measure, which means that the payments will be made to the states rather than to competing LECs. See *id.* at 2. See also Letter from Mace J. Rosenstein, Counsel, Qwest, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 02-148 and 02-189 at 1-2 (dated August 20th, 2002) (Qwest Aug. 20th *Ex Parte* Letter). We expect that if the existing metric on service order accuracy, PO-20, proves not to be adequate for Qwest to maintain a high degree of service order accuracy, then a collaboration between Qwest, the state commissions, and the competing LECs will lead to appropriate changes in the metric.

**Federal Communications Commission**

**FCC 02-332**

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Application by Qwest Communications )  
International, Inc. for Authorization To )  
Provide In-Region, InterLATA Services in the ) WC Docket No. 02 - 314  
States of Colorado, Idaho, Iowa, Montana, )  
Nebraska, North Dakota, Utah, Washington )  
and Wyoming )  
 )

**MEMORANDUM OPINION AND ORDER**

**Adopted: December 20, 2002**

**Released: December 23, 2002**

By the Commission: Commissioner Copps issuing a statement; Commissioner Adelstein not participating.

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