

PID Six-Month Review Collaborative
Master Issues Matrix
As Of: 6/2/04

Proposal Number	PID# or Subject	Proposed By (Who)	Proposal (What)	Rationale for Proposal (Why)	Alternative Proposal/Position	Status Of Proposal
1	BI-1	Qwest	Add exclusion for duplicate records	<ul style="list-style-type: none"> - BI-1 measures the timeliness with which Qwest provides recorded daily usage records to CLECs. Original records are what is properly measured and of value to the CLEC. Credit for providing two records (original and duplicate) should not be taken. Also, duplicate records do not impact the time in which the original records are sent; and therefore, should be excluded. 	1/8 – Parties agreed to the proposal.	1/8 – Closed
2	BI-3A	Qwest	Replace parity standard with a benchmark (Red-Line PID attached.)	<ul style="list-style-type: none"> - Benchmark is a more appropriate standard than parity. When volumes are large and the results are close to 100% accurate, very small differences between retail and wholesale results may be deemed to be statistically significant, but not discriminatory on a practical level. The performance results for BI-3A fit this situation. A benchmark is better suited to ensure a more predictable level of targeted performance month after month. - In addition, a benchmark is a better standard because there are inherent differences between retail and wholesale adjustment types, as to products, type, timing and volumes. - Retail & wholesale products can be significantly different. Retail adjustments are primarily based on standardized tariffed offerings. Wholesale adjustments are based on contracts with a number of individually negotiated terms. Regarding types of adjustments, retail frequently adjusts toll charges, while wholesale adjusts very few. Retail typically issues as 	<p>1/8 – Qwest will present its benchmark proposal in 3 weeks.</p> <p>3/4 – Qwest has withdrawn this proposal.</p>	<p>1/8 – Open</p> <p>3/4 -- Closed</p>

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				<p>few as one or two adjustments per customer; wholesale adjustments often address a large number of adjustments per customer.</p> <p>– For these reasons, comparing wholesale and retail billing adjustments is an apples-to-oranges comparison that is better addressed by a benchmark.</p>		
3	BI-3A	Qwest	<p>Clarify the wording in the formula: change from “Revenue Billed without Error” to “Total Billed Revenue billed in Reporting Period minus Amounts Adjusted Off Bills Due to Errors.”</p> <p>Changes reflected in the red-lined version of the PID referenced above.</p>	<p>– This is a wording change that is easier to understand and consistent with industry language. It does not change the formula itself.</p>	<p>1/8 – Tentative agreement, MCI reviewing with billing SME.</p> <p>1/15 – MCI accepted the change.</p>	<p>1/8 Tentative Agreement</p> <p>1/15 – Closed</p>
4	BI-5	Qwest	<p>Propose a modified PID for Billing Claims Processing. Qwest has been reporting a version of this proposed PID voluntarily since August, 2002 and now seeks approval of this PID modification.</p> <p>(Red-Line PID attached.)</p>	<p>– This PID would evaluate the promptness with which Qwest acknowledges and resolves CLEC billing adjustment claims processed in the Service Delivery Center.</p>	<p>1/8 – Qwest provided a brief overview of its proposal and CLECs will respond in 2 weeks. Qwest will change “responded” to “acknowledge” in the BI-5A disaggregation reporting category. Finally, Qwest will review its business process to determine how to implement the “Legally disputed claims” exclusion.</p> <p>1/22 – After an extended discussion, Qwest agreed to:</p> <p>1. Rewrite the second to the last bullet point in the Description section.</p>	<p>1/8 – Open</p> <p>1/22 – Open</p> <p>1/30 – Open</p> <p>2/13 – Open</p> <p>2/20 – Open</p>

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					<p>2. Review CLEC examples of denied claims without any discussion regarding the reason for the denial (e.g., MCI's DA issue).</p> <p>3. Review its business processes and determine what information is provided to CLECs; what additional information could be provided and; how outside entities are handled in the exclusions.</p> <p>4. Research how claims are handled if initially submitted in the 60 day interval but the magnitude of the claim is beyond 60 days.</p> <p>5. Review a new PID that measures billing claims not credited within 45 days.</p> <p>6. Research why credits for performance remedies resulting from an ICA are excluded.</p> <p>This issue will be discussed on a separate call scheduled for Jan. 30 at 2:30 MST/3:30 CST.</p> <p>1/30 – On the 1/30 call, Qwest responded some of the aforementioned action items and agreed to:</p> <p>1. Provide greater detail and update the process flows for the dispute resolution and claims procedures via the CMP.</p> <p>2. Provide volume data on "returns" to determine how they should be counted in 5a and 5b.</p>	<p>3/12 – Open</p> <p>3/25 – Issue in Dispute</p> <p>5/14 -- Closed</p>

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					<p>3. Consider placing the dispute identification number on the carrier's bill.</p> <p>4. Evaluate why "legally disputed claims" is included in BI-5. Qwest may revise its process for legally disputed claims via the CMP.</p> <p>5. Provide volume data on claims closed prematurely.</p> <p>Qwest is still reviewing how claims are worked if beyond the 60 day limit as well as the ICA credits issue. Regarding adoption of the Verizon PID, Qwest asserts that its systems cannot accommodate this PID. Qwest also stated that no CLEC had complained about receiving timely credits. CLECs will provide examples of not receiving timely credits.</p> <p>The BI-5 issue will be discussed again on a separate call scheduled for Feb. 5, 2004 at 2:30 MST/3:30 CST.</p> <p>2/6 – Qwest circulated a revised PID. Qwest also provided data showing returned claims were 3% for Dec. Qwest also clarified that incomplete claims are counted in 5a but not 5b. Qwest also clarified the "legally disputed claim" process and stated that claims must be open to be excluded from the PID. Regarding claims closed prematurely, Qwest stated that they had 0 in Dec. CLECs agreed to provide any examples of</p>	

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					<p>any prematurely closed claims. Regarding claims that exceed the 60 timeframe, Qwest indicated that the initial claim would be counted as one claim and the older claim would be counted as a second claim. Qwest will review a CLEC proposal to extend the timeframe from 60 days to 90 days. Qwest is still researching how ICA credits and the use of outside entities work with BI-5. Finally, Qwest stated that system issues prevent the adoption of the Verizon PID; however, service reps will assist CLECs in matching billing charges to claims. CLECs will review this proposal and will continue to look for examples of untimely claims. This issue will be discussed again on 2/13 at 2:30 MST/330 CST.</p> <p>2/13 – Qwest withdrew the exclusion that included ICA credits and claims involving outside entities. Qwest is still investigating the request to extent the claim period from 60days to 90 days to determine if conflicts exist with any ICAs. Qwest will also review a request that the "legally disputed issue" exclusion be triggered by an official ADR filing per an ICA. CLECs will provide any examples and/or details of prematurely closed claims and untimely credits by COB on 2/16. The one example provided involved rate changes resulting from cost docket orders. Finally, Eschelon stated that its concern with BI-3 could be resolved with BI-5 if credits are made in a timely based. This issue will be discussed again</p>	

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					<p>on 2/20 at 1:30 MST/2:30 CST.</p> <p>2/20 – Qwest has withdrawn the “legally disputed claims” exclusion. Qwest will review the proposed PID to determine if changes are required as a result of open cost docket proceedings (e.g., no written order is available or rates are retroactive). Qwest rejected the proposal by Eschelon to extend the claims period from 60 days to 90 days but CLECs agreed to review the use of national OBF guidelines to see if it addresses this issue. CLECs agreed to develop a proposal to include “timely credits” and a new diagnostic disaggregation to count the % of resolved claims denied by Qwest that CLECs challenge within “x” number of days. Both proposals are due by Mar. 1 To assist in this effort, Qwest agreed to forward billing claim PIDs used by other ILECs. This issue will be discussed again on 2/27 at 1:30 MST/2:30 CST.</p> <p>3/12—Qwest will confirm that CMP will address the issue of greater detail on the resolution letters as well as system and process issues needed to implement changes to 5A and 5B. Qwest also provided a revised red-line PID. CLECs agreed to review the revised PID, including the proposal for regional reporting. Qwest will review a request by CLECs to make CLEC-specific ad hoc data (including the numerator and denominator) available.</p>	

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					<p>This issue will be discussed again on 3/18.</p> <p>3/18 – Eschelon requested and Qwest agreed to advocate before the CMP, processes and procedures to provide greater detail when a claim is denied. This detail could include references to commission dockets including order date and page number and references to ICAs including section and page number. Qwest also agreed to advocate a process by which CLECs will be able to determine status updates from final responses. Qwest also agreed to provide ad hoc data. Qwest stated that the CMP process may not be completed by the time Qwest intends to implement the revised PID (which is July results reported in Aug.). Eschelon offered an additional month to implement the aforementioned issues. Qwest will consider the request.</p> <p>3/25 – Qwest required additional time to review the proposal and suggested that the parties continue discussions after the LTPA has concluded. Eschelon opposes any more delay. CLECs also opposed Qwest’s proposal to remove CLEC specific reporting from this PID. As a result, the parties have declared an impasse and requested that this issue go through the dispute resolution process.</p> <p>5/14 – Parties accepted a compromise</p>	

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					proposal developed by the facilitator. A miss will not be counted in BI-5 in those instances where Qwest fails to provide a reason when denying a claim. Parties also agreed to joint CMP/LTPA meetings to discuss the business process changes necessary to implement the concept of providing clear explanations when claims are denied. With respect to the reporting issue, parties agreed to regional reporting until the next LTPA collaborative at which time parties can discuss the need for CLEC-specific reporting.	
5	Billing (including, but not limited to BI-5)	Eschelon US Link	A discussion of Qwest's billing accuracy is necessary.	Qwest's wholesale bills are inadequate as evidenced by Qwest's own BI-3 reporting. Qwest has proposed that LTPA address this. Eschelon agrees that a broad discussion of billing issues is necessary.	1/8 – Qwest agreed to provide Eschelon with two audit reports on billing adjustments. Based on this material, Eschelon agreed to document its concerns in greater detail. 1/15 – Qwest provided this material on 1/13. 3/4 -- Eschelon made three proposals. 1) Include all wholesale products, as diagnostic, in BI-3; 2) report BI-3 results by type of BAN and 3) calculate BI-3's performance as a 6 month rolling average. In response, Qwest stated that BI-3 looks at end-user bills (e.g., resale and UNE-P) and not other wholesale products. Absent evidence of sustainable problems, Qwest is not willing to expand BI-3 to report all wholesale products. Regarding reporting products by BAN, Qwest stated that BANs are not unique by product and development work would be required for this proposal. Finally, Qwest is still	1/8 – Open 1/15 – Open 3/4 – Open 3/12 – Issue in Dispute 4/12 -- Closed

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					<p>researching the third part of the proposal. CLECs agreed to provide data showing problems with other wholesale bills (e.g., collocation) and Qwest will attempt to explain in greater detail the issues associated with reporting by BAN. This issue will be discussed again at the 3/11 LTPA meeting.</p> <p>3/12 – Parties agreed to work on a special study to determine what adjustments are necessary for BI-3A. Qwest agreed that this study would include other wholesale products including collocation, Qwest also agreed to determine what product-specific data was available and agreed to share it with the CLECs. Parties did not agree on the proposal by Eschelon to incorporate a 6 month rolling avg. The parties have declared an impasse for this issue.</p> <p>4/12 – Parties accepted compromise proposal developed by the facilitator. Parties agreed not to adopt a 6 month rolling average. Parties also agreed to include bunching of bill adjustments as part of a special study that both Qwest and CLECs agreed to undertake to determine other changes to BI-3.</p>	
6	Qwest request to add BI-5	MCI	Qwest had or circulated a draft of a metric for comments on 8/8/02. MCI responded on 8/22/02 with comments. This issue has never been discussed in detail in ad hoc LTPA.		<p>1/8 – See Issue no. 4.</p> <p>1/22 – See Issue no. 4.</p>	<p>1/8 – Open</p> <p>1/22 – Open</p> <p>5/14 -- Closed</p>

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					10/13 – Issue is the same as Proposal 8 so issue is deleted.	
8	Line Loss PID	AT&T, MCI, US Link, and Eschelon	Qwest's timely and accurate notice of CLEC customer losses should be measured	Only Qwest knows that a resale or UNE-P customer has left. Qwest is required to provide notice of CLEC losses because, without timely and accurate line loss notifications, CLECs will continue to bill customers served by another carrier. Qwest's performance is inadequate. Qwest's performance should be measured and ultimately included in the PAPs.	<p>1/22 – Qwest will circulate its initial position on this proposal. Issue will be discussed on Jan. 29.</p> <p>1/29 – Due to system and process improvements, Qwest believes that it is premature to develop a line loss PID. According to Qwest, the system improvements will increase its ability to process line loss notifiers while the process improvements are designed to improve manual processes. CLECs are currently validating Qwest's improvements but maintain that gaps still exist. Parties agreed to revisit this issue on 2/26, after the CMP meeting at which time some of these system and process improvements will be discussed.</p> <p>2/20 Due to SME availability, issue will be discussed on the 3/4 LTPA call.</p> <p>3/4 – Qwest asserted that the system upgrades demonstrate line loss notices are now timely and are being sent 93% of the time within 80 minutes. Regarding the accuracy, Qwest performed a manual study of 4 CLECs. Qwest asserted that the results of this study show a 99% accuracy rating. In addition, the errors that were discovered involved large, complex manual orders. CLECs are still reviewing their internal data and will provide examples of continued line loss problems.</p>	<p>1/22 – Open</p> <p>1/29 – Open</p> <p>3/4 – Open</p> <p>3/12 – Open</p> <p>3/25 – Issue in Dispute</p> <p>4/26 -- Closed</p>

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					<p>CLECs will also discuss with Qwest off-line, various scenarios and data used in the Qwest study. This issue will be discussed again at the 3/11 LTPA meeting.</p> <p>3/12 – CLECs stated that it was too early to validate the assertion that line loss notices are not missing. CLECs also stated that line loss notices are still not timely. Qwest re-ran its study to exclude loops and asserted that the system enhancements are working. It appears that the data discrepancy may be based on the system used to receive the loss notices (e.g., real time capability vs. the 24 hour process) The parties agreed to continue analyzing the data and the issue will be discussed again on the 3/25 LTPA call.</p> <p>3/25 – Qwest continues to assert that a line loss PID is not necessary. CLECs continue to assert that line loss notices are not timely. As a result, CLECs have declared an impasse and requested that this issue go through the dispute resolution process. However, the CLECs have withdrawn two proposed disaggregations (PO-?C and PO-?D) from the proposal.</p> <p>4/26 – Parties adopted a compromise proposal developed by the facilitator. Parties agreed not to adopt a line loss PID at this time, Parties also agreed to work together and rerun Qwest's line loss performance study, using more recent data and attempt to study all line loss notification methods. The results of this</p>	

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					study will be evaluated at the next LTPA collaborative at which time the need for a line loss PID will be discussed.	
9	MR-7	Qwest	Modify MR-7 to be forward-looking – similar to the new OP-5 measurement – rather than backward-looking. (Red-Line PID attached.)	<ul style="list-style-type: none"> – Both OP-5 and MR-7 began as backward-looking measurements. OP-5 was recently improved by modifying it to be forward-looking. The proposal is to similarly modify MR-7 to be forward looking, thereby improving the measurement by focusing on the quality of original repairs in the reporting month. – The current MR-7 looks for repeat repairs in the reporting month by looking for original repairs either in the reporting month or the prior month – backward-looking. With this method, there is potential for a mismatch between repairs counted in the numerator and those in the denominator (because some repairs counted in the numerator may be repeats of repairs in the prior month, which are not reflected in the denominator), distorting the measurement. – The proposed MR-7 looks at original repairs in the reporting month, and then looks for repeat repairs over a subsequent 30-day period – forward-looking. With this method, repairs in the numerator would match up with those in the denominator, improving the measurement. Results would be reported one month in arrears. 	<p>12/11 – Conceptual agreement by the parties. Qwest agreed to use old data and present the results under the existing method and the new proposal.</p> <p>1/8 – Qwest will provide this analysis by the end of Jan.</p> <p>2/5 – Qwest provided the data showing the “before and after” results for this proposal. Qwest will determine if this change has any impact on OP-5R (e.g., concerns over coding) and the issue will be discussed again on the next LTPA call.</p> <p>2/12 – Qwest reported that coding changes could be completed by 3rd Qtr. 04 and it would not interfere with coding for other PID changes. Eschelon is concerned that coding resources are being used for this PID when the change has no affect on parity scores and no PAP impact. Eschelon would like these resources used for other PIDs (e.g., PO-20) that are important to CLECs. Qwest agreed to consider the request but indicated that CLECs should not control the allocation of resources and that different departments will work on PO-20 and MR-7 and</p>	<p>12/11 – Open</p> <p>1/8 – Open</p> <p>2/5 – Open</p> <p>2/12 – Open</p> <p>2/19 -- Closed</p>

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					therefore there is no affect on coding resources. This issue will be discussed on the 2/19 LTPA call. 2/19 – Qwest confirmed that different resources are used to code modifications to both MR-7 and PO-20. Qwest also confirmed that coding for a new PID or modification to an existing PID begins with LTPA agreement and there is no priority in coding resources for Qwest sponsored PID changes verses CLEC-sponsored PID changes.	
10	MR-8	Qwest	Discussion around potential alignment of numerator (repair tickets) and denominator (lines in service)	– Repair tickets compared to a snapshot of lines in service at a given date may not be the optimal method of measuring trouble report rate.	12/11 – According to Qwest, there is an anomaly in this PID that results in overstating Qwest’s ownership of lines. This Issue will be revisited in January after Qwest provides more detail regarding the anomaly. 2/19 – Proposal has been withdrawn.	2/19 -- Closed
10a	MR-3, 4, 5, 6	Eschelon	The phrase “of receipt” should be changed to “that Qwest is first notified of the trouble by CLEC” in the Description sections of these PIDs.	The intent of these PIDs is to measure the entire amount of time that a customer is out of service. The proposed changes are necessary to better reflect the repair interval.	1/15 – Qwest accepted the proposal but after some discussion, CLECs are concerned that for certain trouble tickets, not all time is captured and recorded. Qwest indicated that this occurs less than 1% of the time. AT&T and Eschelon will review their data to confirm Qwest’s assertion. 1/29 – Qwest provided data to support its assertion that excluded records occur less than 1% of the time. Eschelon agreed to	1/15 – Open 1/29 – Open 2/5 -- Closed

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					<p>than 1% of the time. Eschelon agreed to review the data and its proposal by next week.</p> <p>2/5 – Parties agree to the proposal and the issue is closed.</p>	
10b	MR-3 and 4	Eschelon	Delete the phrase “indicted as” in the second bullet point in the Description section.	To be consistent with MR-5 and 6.	1/15 – Qwest accepted the proposal.	1/15 -- Closed
11	Benchmark standards for DS1 capable loops in OP-3 and OP-4	Eschelon US Link	Change DS1 capable loop standards to benchmarks for OP-3 and OP-4	Qwest’s retail and wholesale installation intervals are not comparable. When no retail analogue exists, benchmark standards are necessary to evaluate whether CLECs have a meaningful opportunity to compete.	<p>1/29 – While not opposed to benchmarks, Qwest opposed this proposal without a firm offer by the CLECs. Qwest agreed to provide data to help CLECs develop benchmarks. On the 2/5 LTPA call, Qwest will provide an update as to when the data will be delivered. The parties did agree to have a discussion at a later date on changing standards for certain products from parity to benchmarks.</p> <p>2/5 – Qwest continues to develop the requested data (zone 1 vs. zone 2 and by volume) and will report back on the next LTPA call.</p> <p>2/12 –Qwest will provide the data to CLECs by 2/12 and substantive discussions will begin on the 2/26 LTPA call.</p> <p>2/26 – CLECs oppose the current parity standard for DS-1 capable loops in OP-4</p>	<p>1/29 – Open</p> <p>2/5 – Open</p> <p>2/12 – Open</p> <p>2/26 – Open</p> <p>3/12 -- Closed</p>

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					and proposed a benchmark of 5.5 days for AZ, CO, MN, NM, SD, UT and WA and a 9.5 day benchmark for the other states. In response, Qwest proposed a parity standard for those states with a 9 day interval (IA, ND, MT, OR, NE, ID, WY) and a 5.5 day standard for the other 7 states. CLECs agreed to review the proposal and respond no later than Mar. 4 and the issue will be discussed at the Mar. 11-12 LTPA meeting in Denver. 3/12 – CLECs accepted the counter proposal by Qwest for OP-4 and have withdrawn their proposal for OP-3.	
12	OP-4, -6 & 15	Qwest	Add OP-3 exclusion language for non-Qwest reasons to OP-4, -6 & -15 (Red-Lined PIDs for OP-4, -6 & -15 attached.)	– OP-3 recognizes that events outside of Qwest's control are validly excluded, i.e. weather, disasters, work stoppage. While this PID explicitly recognizes this exclusion, the current language in OP-4, -6 & -15 is silent on these non-Qwest reasons. They only delineate CLEC/customer caused misses. This change is simply to make the language of OP-4, -6 & 15 as explicit as OP-3.	1/29 – Qwest agreed to provide examples of this type of exclusion. Qwest also agreed to recalculate OP-4, 6, and 15 with, and without the excluded data. This issue will be discussed again on the 2/5 LTPA call. 2/5 – Qwest continues to develop the requested data and will report back on the next LTPA call. 2/12 –Qwest will provide the data to CLECs and the issue will be discussed again on the 2/19 LTPA call. 2/19 – CLECs contend that with the exception of Jan., the volumes for these	1/29 – Open 2/5 – Open 2/12 – Open 2/19 -- Closed

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					exclusions are small and therefore have no impact on Qwest's performance. Qwest disagrees and believes that without these exclusions, the actual performance is skewed. Qwest agreed to defer this issue until the next 6-month LTPA collaborative and collect more data to support its position.	
13	OP-3, -4, -5, -6, & 15 and MR-3, -4, -5, -6, -7, -8 & -9	Qwest	Develop volume thresholds that determine changes in product reporting categories. Factors include both new installations volumes and total in service by state.	<ul style="list-style-type: none"> - Adding or subtracting products over an appropriate period of time will ensure that important products are reported. - It also will ensure that reporting resources are wisely spent. 	<p>11/13 – Issue related to Proposal 33 and will be discussed on Dec. 11</p> <p>12/18 – After discussing the proposal by Qwest and the response by CLECs, Qwest agreed to determine if xDSL-i loops are included in OP, PO and MR PIDs. Qwest also agreed to provide a "cheat sheet" of which LSRs are included in PIDs, Qwest will also provide an example of the timeline that would be used to begin reporting on a new product.</p> <p>1/8 – In 2 weeks, CLECs will submit a revised proposal based on volume growth rather than a bright line threshold as proposed by Qwest. At the same time, Qwest will review its proposal focusing on its ability to report disaggregations for existing products faster than for new products. See Issue 32 for the discussion of xDSL-I loops.</p> <p>1/22 – Covad, Eschelon and MCI provided a framework/process to determine if a new product should be reported in the PIDs.</p>	<p>12/18 – Open</p> <p>1/8 – Open</p> <p>1/22 – Open</p> <p>1/29 – Open</p> <p>2/12 – Open</p> <p>2/19 – Open</p> <p>2/26 – Open</p> <p>3/4 – Open</p> <p>3/12 – Open</p>

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					<p>product should be reported in the PIDs. Qwest will research this proposal. CLECs agreed to review questions raised by Qwest (that will be send via email) and determine if the proposal could be more flexible.</p> <p>1/29 – CLECs responded to questions raised by Qwest. Qwest requested that the CLEC proposal contain a minimum volume threshold. Initially, CLECs are concerned with committing to a volume threshold without knowing how a new product will develop over time. However, the CLECs agreed to entertain this concept if Qwest makes a specific proposal. The CLECs agreed that the standard to be developed in Step 4 of the process could include a diagnostic standard. Qwest continues to review the proposal and will respond on the 2/12 LTPA call.</p> <p>2/12 – Qwest provided a red-line counter proposal to the CLECs that included using predetermined conversion factors for determining volume estimates and alternatives to developing the standard based on the availability of performance data. CLECs will review the proposal and notify Qwest early next week if the concept of conversion factors is acceptable and the entire proposal will be discussed on the 2/19 LTPA call.</p>	3/25 -- Withdrawn

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					<p>2/19 – Covad and Qwest will discuss this issue off-line and will report back on the 2/26 LTPA call.</p> <p>2/26 – Parties continue to discuss this issue off-line. A status will be provided on the 3/4 LTPA call.</p> <p>3/4 – Off-line discussions continue and parties agreed to hold substantive discussions at the 3/11 LTPA meeting.</p> <p>3/12 – Due to a recent reorganization, Qwest requires additional time to review the current proposal. This issue will be discussed again on the 3/25 LTPA call at which time Qwest will inform the collaborative as to their position in issues 13/33 and how this will affect PO-2, loop splitting and xDSL-i.</p> <p>3/25 – Qwest is concerned that adding products to the PIDs will automatically flow into PAPs in certain states. As a result, Qwest will review requests to add products on a case-by-case basis. Qwest also stated that if a new product is added to the PIDs, it will be considered a “light” PID which means that reporting of any new product will have no affect on state PAPs.</p>	

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					Parties agreed to withdraw this proposal and consider adding or subtracting products on a case-by-case basis.	
14	OP-3, -4, -5, -6, & 15 and MR-3, -4, -5, -6, -7, -8 & -9	Qwest	Determine product disaggregations according to same/similar underlying process and standard intervals. E.g. Resale Qwest DSL follows design and non-design repair, currently all reported under Zone type. Propose creation of reporting categories in MSA disaggregation as in installation measurements.	- This will simplify reporting, make reports more manageable but retain a meaningful aggregation of products.	2/19 – Proposal has been withdrawn.	2/19 --Closed
14a	Sub-loop OP-3/4/5/6/15, MR-3/4/6/7/8	USLink	Set standards for sub-loop where currently diagnostic.	Colorado currently has standards for some. USLink would like to see standards in all states. -	1/29 – Given the small volume of sub-loop orders, and the on-going discussion regarding Issue 13 and 33, Qwest and USLink agreed to discuss this proposal off-line. 2/19 – Due to the small volumes and the potential changes resulting from the TRO, US Link has agreed to defer this issue until the next 6-month LTPA collaborative.	1/29 – Open 2/19 -- Closed
14b	OP-17 MR-3, MR-4, MR-6, MR-7, MR-8, MR-9, and MR-11.	Qwest	Modify OP-17 by inserting "provisioning" before the term "trouble report". Modify various MR PIDs by inserting "repair" before the term "trouble report."	Revised language provides greater consistency and was negotiated by the industry as part of OP-5.	12/4 – Issue discussed as administrative cleanup. Eschelon disagreed with this administrative change and requested separate discussions. Issue scheduled for discussion on Dec. 11. 12/11 – Qwest has withdrawn this proposal. Eschelon is concerned that Qwest is not capturing trouble reports for	12/4 – Open 12/11 Withdrawn

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					new installations. Eschelon may propose a new PID or modifications to existing PIDs.	
15	PO-1	Qwest	Adopt AZ benchmarks for the 9th and 10th Pre-Order transactions: <ul style="list-style-type: none"> - Connecting Facility Assignment - 25 seconds - Meet Point Inquiry - 30 seconds (Red-Line PID attached.)	<ul style="list-style-type: none"> - Initial 6 month reporting period ended. - Issue went to impasse in Arizona and Qwest is willing to accept the standards adopted in AZ but should CLECs prefer no standard at this time leave as TBD. - Synchronize benchmark with AZ standard 	1/29 -Parties agree to the proposal.	1/29 - Closed.
15a	PO-1	Qwest	Delete the first note.	- LTPA forum should be used to expand the list of reported transactions.	12/4 - Issue discussed as administrative clean-up but was determined to be substantive in nature. Future discussions are planned for Dec. 11. 12/11 - Qwest agreed to retain this footnote.	12/4 - Open 12/11 - Closed.
16	PO-2	Qwest	Propose inclusion of UNE-P Ctx 21 and line sharing in PO-2; diagnostic for 1 st 6 months, with consideration at the end of 6 months whether to add to an existing product reporting category. 1. Create new product disaggregation for UNE-P Centrex 21 2. Create new product disaggregation for Line Sharing only.	<ul style="list-style-type: none"> - MN Commission directed Qwest to submit a proposal to LTPA by 11-6-03. - Propose separate reporting and diagnostic for 1st 6 months to provide history needed to set benchmark 	2/5 - Parties agreed to add UNE-P Ctx 21 and Line Sharing disaggregations but opposed having diagnostic standards. Qwest will determine if there is any historical data that could be used to develop a benchmark for UNE-P Ctx 21. According to Qwest, historical data that shows line sharing and line splitting combined may exist, but historical data specific to line sharing does not exist. Qwest will also determine if line splitting is flow-through eligible. 2/19 - According to Qwest, there is no	2/5 - Open 2/19 - Open 2/26 - Open 3/25 --- Issue in Dispute 5/27 - Line Sharing is closed. UNE-P Centrex 21 is unknown.

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					<p>historical data for either product. Qwest agreed to review materials from a Sept. 03 CMP meeting were Eschelon reported that Qwest had data to support a 95% benchmark. This issue will be discussed again on the 2/26 LTPA call.</p> <p>2/26 – Qwest reported that Eschelon misunderstood the CMP meeting and according to Qwest, there was no representation of a benchmark in the 90% range. Parties agreed that the outcome of this issue will be driven by the outcome of Issues 13 and 33.</p> <p>3/25 – The parties do not agree on a standard for these two products. Qwest proposes a diagnostic standard for 6 months while CLECs oppose both the 6 month diagnostic period as well as the "light" PID concept discussed under Issue 13.</p> <p>5/27 –State staff voted unanimously in favor of the facilitator's recommendation that accepted Qwest's position and recommended that UNE-P Centrex 21 be combined with UNE-P (POTs) in PO-2 and reported using the existing 95% standard. At this time, it's unknown if CLECs intend to pursue this issue before each state commission. This issue also included line sharing but subsequent negotiations resolved this portion of the issue.</p>	
17	PO-2 & PO-5	Qwest	Discussion around whether a diagnostic standard would be appropriate for PO-2 and PO-	– CLEC behavior impacts flow-through and flow-through exceptions do not directly correlate to problems with commitments	2/26 – Prior to the LTPA call, Qwest modified its proposal such that the standard for PO-2B would be diagnostic	2/26 – Open 3/12 --

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			5, when results for product families are meeting standards in OP-3	<p>met and intervals.</p> <ul style="list-style-type: none"> - Qwest's ability to flow through LSRs does not affect our ability to provision accurately, return FOC on time, or turn up on time. As long as Qwest is meeting standards in OP-3, flow through and FOC intervals have not negatively impacted the customer experience. - PO-20 and the new OP-5 will capture accuracy issues related to orders that do not flow-through. 	<p>unless it is shown that standards are missed under the existing PIDs (OP-3 and OP-8). One CLEC felt that the proposal was premature due to the infancy of PO-20 and that parties need to consider the interplay between PIDs and PAPs. CLECs will review the proposal and the issue will be discussed again on the 3/4 LTPA call.</p> <p>3/12 - Qwest plans to address this issue after phase 2 of PO-20 has been implemented and therefore this issue has been withdrawn.</p>	Withdrawn
18	PO-5	Covad	Further disaggregate PO-5 for all product categories to report out disconnect and provisioning FOCs separately	<ol style="list-style-type: none"> 1. The SIG forms the basis for the intervals contained in the PIDs. However, the SIG identifies different standards for provisioning and disconnect FOCs. 2. Inclusion of both types of FOCs in one product category permits Qwest to mask poor performance in one type of activity by including it with another. 3. Disconnect and provisioning FOCs serve very different purposes and should be reported and evaluated separately. 	<p>1/22 - Qwest does not support the proposal because it would double the number of reported results with no corresponding benefit. Qwest reviewed 3 months of data and concluded there were no performance issues between the two FOCs. In response, Covad stated that this type of data would help in monitoring performance and identify trends. Qwest stated that the raw data used to calculate this PID (including the two types of FOC data) was available and Covad could conduct its own analysis. Covad agreed to modify its proposal to only apply to UNE-Loops which Qwest will review. Covad will review its proposal given Qwest's assertion that the raw data is available. This issue will be reviewed again on 1/29.</p> <p>1/29 - Due to SME availability, this issue has been deferred to the 2/12 LTPA call.</p> <p>2/12 - Covad withdrew its proposal.</p>	<p>1/22 - Open</p> <p>1/29 - Open</p> <p>2/12 -- Withdrawn</p>

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19	PO-8	Qwest	Delete measurement.	<ul style="list-style-type: none"> - When PO-8 was created Qwest's process for CLEC jeopardy notices was not adequate. As a result of the inadequate process, the parties determined the need for both an interval and a percentage measurement. Since then, Qwest has developed a robust jeopardy process for CLECs that exceeds retail service (See PO-9 results for last 6 months) - Qwest believes the critical measurement capturing customer impact for CLECs is PO-9, which measures Qwest's performance in providing jeopardy notices in advance of the due date compared to retail. - CLEC ordering habits are different than our retail customers. CLECs tend to order more in the 2 week or less timeframe, whereas, retail customers tend to place orders further in advance of when they need the service. This is especially true for new development areas (sometimes over a year in advance.) Including the extended intervals in the retail comparative prohibits a meaningful comparison of retail to wholesale intervals. - Even with these mitigating factors included in the results, the actual PO-8 performance over the last several months does not portray a competitively significant difference between retail and wholesale. E.g. Differences under a day are not competitively significant. - Elimination will ensure that reporting resources are wisely spent. 	<p>2/5 – According to CLECs, parties must consider the PAP implications of any deleted PID as well as Qwest's ability to recode and begin capturing data if a deleted PID needs to be placed back into production. CLECs oppose the proposal stating that the results have been low and the PID provides value. In response to Qwest's concerns, CLECs would not be opposed to addressing the anomalies in the PID and developing a benchmark standard. Qwest will review the proposal in light of these comments.</p> <p>2/19 – Proposal has been withdrawn.</p>	<p>2/5 – Open</p> <p>2/19 -- Closed</p>

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20	PO-10	Qwest	Delete measurement	<ul style="list-style-type: none"> - This measurement was initially included with the idea that, in the six-month review, it would be removed absent evidence that Qwest's processes were failing to account for LSRs. (See Note in existing PID) - Qwest has systems in place to prevent problems in this area. - Results over the last 12 months have been 100%, 11 of 12 months; 99.99% in Oct 02. - Elimination will ensure that reporting resources are wisely spent. 	2/5 – Parties agreed to the proposal subject to the re-coding issue described in Issue 19.	2/5 -- Closed
21	PO-15	Qwest	Delete measurement	<ul style="list-style-type: none"> - This PID was created at a point more than 4 years ago when the business process did not have sufficient control around due date changes. Those business processes have been improved so it is no longer necessary. - OP-3 measures to "applicable due date." Qwest caused due date changes are accounted for in OP-3. No additional measurement is needed. - Due date changes do not necessarily impact customers negatively. For example, if Qwest completes work early and gains customer approval to change the due date and close the order, the customer experience is enhanced. - Elimination will ensure that reporting resources are wisely spent. 	<p>2/5 – CLECs opposed the request and stated that the PID provides valuable information. CLECs also stated that the process measured by the PID was not stable enough to support deleting the PID. Finally, CLECs assert that Qwest is not harmed by the PID because of the diagnostic standard. CLECs agreed to review this proposal with internal SMEs and the issue will be discussed again on the next LTPA call.</p> <p>2/12 – Qwest withdrew the request after CLECs stated that they have business concerns when Qwest sends multiple FOCs and this PID is needed to monitor and quantify the concern.</p>	2/5 –Open 2/12 – Withdrawn.
22	PO-19	Qwest	Propose AZ version that includes PO-19B. Reorder the notes, Add sunset clause to the exclusion related to separate prioritization of SATE and IMA releases in CMP. Add	<ul style="list-style-type: none"> - PO-19B is being reported but has not been approved and incorporated into the 14 state PID. 	<p>1/15 – CLECs to review proposal. Further discussions are scheduled for 1/22.</p> <p>1/22 – CLECs agreed to the proposal.</p>	1/15 – Open 1/22 - Closed

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			language in Note clarifying when product activity combinations will be communicated. (Red-Line PID attached.)			
23	PO-20	Qwest	Finalize PID language for pending PO-20 Phase 1 (Propose continuing development in adhoc meetings)	<ul style="list-style-type: none"> - Existing measurement is an interim measurement. - Eliminate manual review of a sample of orders. 	<p>11/13 – Parties agree to continue negotiations (for the near future) in Ad hoc group. Final resolution will be presented to the LTPA</p> <p>2/5 – This issue will be discussed on the 2/12 LTPA call. A tentative agreement was negotiated by the Ad hoc group which will be finalized on the next Ad hoc call scheduled for 2/9 at 3:00 CST.</p> <p>2/12 – Qwest reported that agreement on Phase 1 was needed within a week to begin development. CLECs still had a few issues with the proposal including; 1) Concern with the open-ended date for Phase 3; 2) Aggregation of inward and change orders and; 3) a 95% benchmark. Eschelon recommended a 99% benchmark and will provide scenarios that will demonstrate how Qwest could pass a 95% BM with poor performance. Issue will be discussed on the 2/19 LTPA call.</p> <p>2/19 – Qwest agreed to implement the Blocking requirements between the end of this year and 1st quarter of next year. Qwest also agreed to a request by Eschelon to provide monthly status reports on the implementation of the blocking requirements. The parties agreed to an Ad Hoc call to discuss both PID and PAP related issues associated with PO-20. The</p>	<p>2/5 – Open</p> <p>2/12 – Open</p> <p>2/19 – Open</p> <p>3/4 --- Open</p> <p>3/12 – Issue in Dispute</p> <p>4/27 -- Closed</p>

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					<p>call is scheduled for Mar. 1 at 11:00 MST and the results of this call will be discussed on the 3/4 LTPA call.</p> <p>3/4 – Parties have conducted three additional ad hoc meetings and as a result, Eschelon withdrew its proposal related to inward vs. change orders. Parties also stated that there is no agreement regarding the benchmark – CLECs support 99% and Qwest supports 95%. This issue will be discussed again at the 3/11 LTPA meeting.</p> <p>3/12 – Parties do not agree on the benchmark. Qwest would accept a declining benchmark structure that would be implemented as additional phases were implemented (e.g., 97%, 95% and 93% or 96%, 95% and 94%) but opposed a proposal by CLECs to have the structure be 97%, 96% and 95%. Parties have declared an impasse for this issue.</p> <p>4/12 – Parties accepted a compromise proposal developed by the facilitator. The benchmark for PO-20 will be set at 97% until Phase 2 has been implemented at which time the benchmark will be reduced to 96%. When Phase 3 is introduced, the benchmark will be reduced to 95%.</p>	
24	PO-20	MCI Eschelon	<p>MCI is ok with Commission Staffs recommendation that the ongoing discussions on OP-20 be incorporated into this review session.</p> <p>In addition, if agree on</p>	Ease and efficiency to having one forum.	11/13 – See Proposal 23	<p>2/5 –Open</p> <p>2/12 – Open</p> <p>2/19 – Open</p> <p>3/25 – Issue in</p>

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			measure and standards MCI would support collaboration between parties to see if can agree on PAP Tier and weighting.			Dispute 4/12 – Closed
25	Line Splitting (PO-5, OP-3/4/5/6/15, MR-3/4/6/7/8)	MCI Covad	Request is to add Line Splitting as a separate product category to all measures where Line Sharing is currently included.	MCI -- Simply, Line Splitting is a Qwest product offering that CLECs are ordering through out the region and therefore, Qwest should provide performance reporting on this product so that CLECs and the states can monitor Qwest's ability to provide this service offering. Line Splitting should be a separate product category and not combined with Line Sharing where poor performance for one product may be masked by combining the service results. MCI would accept the same standards be applied as Line Sharing. In Colorado, Qwest required to report performance results separately for majority of measures. Covad -- Qwest is required and does provide these products. Therefore, Qwest should be required to report on them, particularly as the importance and order volumes for these products is and will grow.	12/18 – This proposal does not apply to OP-5. Parties agreed to delete the term "Shared Loop" from the shared loop-line sharing disaggregation. Qwest to determine how long it will take to begin reporting results. 1/8 – For OP and MR PIDs, Qwest will report results in Feb. reflecting activity back to Sept. 03 except for OP-5, which will reflect activity back to Nov. 03. Also, Qwest will make a modification to PO-5 to include line splitting in product category (b) – Unbundled Loops and Specified UNEs.	12/18 – Closed
26	Loop Splitting (PO-5, OP-3/4/5/6/15, MR-3/4/6/7/8)	MCI Covad	Request is to add Loop Splitting as a separate product category to all measures where Line Sharing is currently included.	MCI -- This to is a Qwest product offering and to the extent that CLEC's order this service Qwest should provide performance reporting on this product so that CLECs and the states can monitor Qwest's ability to provide this service offering. Loop Splitting should be a separate product category and not combined with Line Sharing or Line Splitting as well. MCI could consider using the same standard used for line sharing but is open for discussion on the appropriate standard.	12/18 – Qwest asserted that they have zero lines in service and therefore there is nothing to report. Covad and MCI will review their proposal and may offer an alternative. 1/8 – See Issue 13. The volume threshold discussion directly affects this issue. 3/25 – Due to low volumes as well as state PAP implications, Qwest opposes any reporting of loop splitting products. As a	12/18 – Open 1/8 --- Open 3/25 – Issue in Dispute. 5/19 – Issue remains in dispute.

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				Covad -- Qwest is required and does provide these products. Therefore, Qwest should be required to report on them, particularly as the importance and order volumes for these products is and will grow.	<p>result, CLECs have declared an impasse and requested that this issue go through the dispute resolution process.</p> <p>4/21 – Facilitator adopted the CLEC’s position and recommended that Qwest begin reporting Loop Splitting for PO-5, OP-3, 4, 5, 6 and 15, MR-3, 4, 6, 7 and 8. Facilitator also accepted the CLEC’s proposed standard of a six month diagnostic period. State staff voted unanimously in favor of these recommendations for the reasons stated in the impasse document. It appears that Qwest has rejected this recommendation and intends to pursue this issue before each state commission.</p>	
27	Line Sharing and Line Splitting OP-6, OP-15 and OP-5	MCI Covad	Request that standard be set where currently listed as diagnostic.	<p>MCI -- Have had sufficient reporting of Line Sharing and volumes are increasing for Line Splitting and standard should be developed as it has for the majority of the other products and other measures under Line Sharing.</p> <p>Covad -- A “diagnostic” standard is no longer appropriate because Qwest has had ample experience and order volume to establish an appropriate standard.</p>	<p>12/18 – Covad and MCI offered the following two alternative standards:</p> <ol style="list-style-type: none"> 1. Parity with Qwest DSL service or: 2. Parity with Res/Bus POTs <p>This proposal applies to line sharing and line splitting for both OP-6 and OP-15. It only applies to line splitting for OP-5</p> <p>1/8 – Qwest is still reviewing the proposal.</p> <p>1/15 – For Line Splitting products reported in OP-5, 6, and 15, the parties agreed to begin discussing standards after Feb data is available (See Issue 29). For Line Sharing, Qwest agreed to a standard for OP-6 based on parity with Qwest retail DSL service and proposed that the standard for OP-15 remain diagnostic but include a parenthetical stating that the</p>	<p>12/18 – Open</p> <p>1/8 – Open</p> <p>1/15 – Open for OP-5, 6, and 15 (Line Splitting), Closed for OP-6 (Line Sharing). Open for OP-15 (Line Sharing).</p> <p>2/12 – All Line Sharing issues closed including OP-15</p>

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					<p>expectation would be parity with retail DSL service. CLECs agreed to OP-6 and will review Qwest's proposal for OP-15</p> <p>2/12 – CLECs adopted the proposal by Qwest for OP-15.</p> <p>3/4 – Parties are reviewing the line splitting data, both from a regional perspective as well as state-specific to determine an appropriate benchmark. CLECs agreed to provide a proposal before the 3/11 LTPA meeting.</p> <p>3/12 – Parties have agreed on a standard for OP-6 and OP-15. See Issue 30 for OP-5 discussion.</p>	<p>3/4 – Open</p> <p>3/12 -- Closed</p>
28	PO-5	Covad	Establish standards for line splitting and loop splitting product categories.	Qwest is required and does provide these products. Therefore, Qwest should be required to report on them, particularly as the importance and order volumes for these products is and will grow. Additionally, not only is reporting required, but Qwest should be held to a performance standard so that it not hamper competitors' ability to compete. Because of the identity of technical and provisioning processes between line sharing and line splitting, and the even greater ease from a technical perspective of provisioning loop splitting, the line sharing standards should be adopted for line and loop splitting.	<p>1/8 – See Issue 26 for Loop Splitting. Issue is closed for Line Splitting.</p> <p>3/25 – Parties have agreed to a standard for line splitting. Due to low volumes as well as state PAP implications, Qwest opposes any reporting of loop splitting products.</p> <p>4/21 – See Issue 26 for discussion of facilitator's recommendation regarding Loop Splitting.</p>	<p>1/8 – Closed for Line Splitting. Open for Loop Splitting.</p> <p>3/25 – Loop Splitting portion of this issue is disputed.</p> <p>5/19 – Issue remains in dispute.</p>
29	OP-3, 4, 5, 6, 15, MR-3, 4, 6, 7, 8	Covad	Establish standards for line splitting and loop splitting product categories.	Qwest is required and does provide these products. Therefore, Qwest should be required to report on them, particularly as the importance and order volumes for these products is and will grow. Additionally, not	<p>1/8 – See Issue 26 for Loop Splitting. Qwest recommends using 6 months of reported data to establish the standard for Line Splitting. This data will be available at the end of March. Covad recommends</p>	<p>1/8 – Open</p> <p>3/12 – Open</p> <p>3/25 – Loop</p>

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				<p>only is reporting required, but Qwest should be held to a performance standard so that it not hamper competitors' ability to compete. Because of the identity of technical and provisioning processes between line sharing and line splitting, and the even greater ease from a technical perspective of provisioning loop splitting, the line sharing standards should be adopted for line and loop splitting.</p>	<p>beginning the discussion now and not wait until the end of March. Parties have agreed to use 4 months of reported data (which will be available at the end of Feb.) as the starting point for negotiating a standard. Covad will review the data and offer a proposal on the first LTPA call after data is reported.</p> <p>3/12 – Parties agreed to a standard for MR-7. For MR-3, 4, 6 and 8, Qwest will determine what its performance would be if ISP issues were removed from these PIDs. After reviewing the results, CLECs may consider a parity standard measured against Qwest's retail xDSL-service. For OP-3, Qwest will agree to the CLEC proposed standard if CLECs will agree to a low volume standard. CLECs are reviewing this proposal. For OP-4, CLECs are reviewing a proposal by Qwest to have a 3.3 day standard and a low volume standard. This issue will be discussed again on the 3/25 LTPA call. See Issue 30 for OP-5 and Issue27 for OP-6 and OP-15.</p> <p>3/25 – Parties have agreed to a 3.3 day standard for OP-4 as well as a standard for OP-3 Qwest continues to support a low volume exception for OP 3 and 4. CLECs believe that the low volume exception should be handled in state PAP proceedings. Due to low volumes as well as state PAP implications, Qwest opposes any reporting of loop splitting products. As a result, parties have declared an impasse and requested that these issues go through the dispute resolution process.</p>	<p>Splitting issues are disputed. The following line splitting issues are disputed: MR-3, 4, 6 and 8 and the low volume proposal for OP-3 and 4.</p> <p>5/19 – Both issues remain in dispute.</p>

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					<p>4/21 – Facilitator adopted the CLEC’s position and recommended that the standard for Line Splitting for OP-5A, MR-3, 4, 6, 7 and 8 be the same standard that is used for Line Sharing. Facilitator also recommended that reporting for OP-5A begin immediately. See Issue 26 for facilitator’s recommendation regarding Loop Splitting.</p> <p>State staff voted unanimously in favor of these recommendations for the reasons stated in the impasse documents. It appears that Qwest has rejected these recommendations and intends to pursue these issues before each state commission.</p>	
30	OP-5 subcategories	Covad	Evaluation of standards for line sharing and loop splitting.	As a result of discussions in the ad hoc LTPA, certain standards for line sharing were established for the OP-5 subcategories. At that time, no standards were established for line splitting because of the lack of order volume. However, in light of additional experience with eh OP-5 subcategories for line sharing, and because Qwest is regularly provisioning line splitting orders, the parties should evaluate the standards (or lack thereof) set for line sharing and line splitting for the OP-5 subcategories.	<p>1/8 – Two months of data for Line Splitting will be available in Feb. Parties have agreed to use the process outlined in Issue 29 but discuss the standard for OP-5 at the end.</p> <p>Qwest will determine what its performance would be if ISP issues were removed from this PID. After reviewing the results, CLECs may consider a parity standard measured against Qwest’s retail xDSL-service. This issue will be discussed again on the 3/25 LTPA call.</p> <p>3/25 – Due to low volumes as well as state PAP implications, Qwest opposes any reporting of loop splitting products. For line splitting, Qwest asserts that with only 2 months of data, it’s too early to establish a benchmark. Qwest will review the data</p>	<p>1/8 – Open</p> <p>3/12 – Open</p> <p>3/25 – Loop splitting issues are in dispute. Line splitting issues are open.</p> <p>5/19 – Both issues remain in dispute.</p>

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					after one additional month is available and notify the LTPA as to whether a standard can be established. 6/2 --- See Issue 26 for facilitator's recommendation for Loop Splitting and Issue 29 for facilitator's recommendation for Line Spitting.	
31a	EELs (PO-5, OP-3/4/5/6, MR-5/6/7/8.	MCI Eschelon US Link	Request that standard be set where currently listed as diagnostic.	MCI -- In Colorado the parties entered into a stipulation that was accepted by the Colorado Commission and standards for EELs were accepted into the PAP. This issue of standards for EELs was also brought up in the Washington PAP review. Qwest's response was that "this is a PID standard issue and should be discussed in LTPA". MCI would be willing to agree to the same standards the parties agreed to in Colorado. Eschelon -- The FCC and state commissions have recognized the importance of EELs. Some states have ordered standards. LTPA should adopt similar standards for EELs.	1/15 -- Qwest agreed to the proposal. Qwest is not sure how to incorporate TRO obligations requiring network modifications to be at parity with retail into various PIDs. Qwest will submit this as a new issue since it affects a variety of PIDs and products (e.g., Hi-Cap) in addition to EELs. See Issue 31b.	1/15 -- Closed
31b	PID Impacts as a Result of TRO Requirements	Qwest	Adjust PIDs to align with the requirements of the TRO.	Qwest is studying the requirements of the TRO and their impacts on PIDs including an analysis of PID changes due to process changes such as additional network modifications required by the TRO. These impacts on the PIDs need to be addressed in a holistic way and may require that prior issues be addressed such as the resolution of proposal 31a.	2/26 -- Parties agreed to defer this issue to the next LTPA collaborative or until state TRO proceedings are completed.	2/26 - Closed
32	xDSL-I under various PIDs	Eschelon US Link	xDSL-i capable loop product reporting should be added to existing measures.	Product currently not measured under PIDs. Product has been available and ordered for at least 2 years.	1/8 -- Qwest stated that xDSL-I loops are reported in 15 PIDs. A list of these PIDs will be provided by Qwest. Qwest also	1/8 -- Open 1/15 -- Open

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					<p>opposes reporting this product because it does not meet its volume threshold level. Qwest and Eschelon have different volume numbers and agreed to work off-line to reconcile the data,</p> <p>1/15 – Qwest stated that the following PIDs report xDSL-I loops: PO-2, 3, 4, 5, (b), 6, 7, 8(b), 9, 10, 15; OP-7 and 13; BI-3A, 4A, and 5. Eschelon and Qwest have also reconciled their xDSL-I volumes.</p> <p>3/25 – Qwest has agreed to report this product (as a light PID as described in Issue 13) beginning with April results. CLECs oppose the light PID concept. As a result, CLECs have declared an impasse and requested that this issue go through the dispute resolution process.</p> <p>4/29 – Facilitator recommended that the CLEC’s position be adopted and Qwest should begin reporting xDSL-i capable loops using the same standard that is used for ISDN-capable loops beginning with June performance reported in July. State staff voted unanimously in favor of this recommendation for the reasons stated in the impasse document. It appears that Qwest has rejected this recommendation and intends to pursue this issue before each state commission.</p>	<p>3/25 – Issue in Dispute</p> <p>5/19 – Issue remains in dispute.</p>
33	Products not currently reported under existing PIDs; development of	Eschelon	LTPA should establish a general presumption that each product that Qwest offers should be measured under existing PIDs. For	Since the PIDs were developed, Qwest has made additional products and capabilities available. For example, products such as Centrex 21 and line sharing are now flow-through eligible. However, Qwest does not	<p>11/13 – Issue related to Proposal 13 and will be discussed on Dec. 11</p> <p>1/22 – See Issue no. 13.</p>	<p>1/22 – Open</p> <p>3/25 -- Withdrawn</p>

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	a general approach.		unmeasured products introduced prior to November 1, 2003, Qwest should be required to identify products and availability for measurement to LTPA by January 1, 2004. For products introduced after November 1, 2003, Qwest should be required to measure its performance within 30 days of product availability.	measure whether these orders actually flow through in PO-2. It has already been determined that Qwest's performance should be measured in key areas (e.g., ordering, provision, etc.). It has already been determined that Qwest must provide these products in a non-discriminatory manner under state and federal law. Qwest should measure its performance under existing metrics. LTPA will determine appropriate standards.		
34	Tier Designation	Eschelon	LTPA should discuss Tier designations for new PIDs.	As part of the discussion of PID additions, parties should identify their positions on Tier designations for PAP purposes. For example, Eschelon has proposed that PO-20 be treated the same as OP-5 under the Washington PAP as part of that Commission's six-month review once PO-20 is finalized. If other parties can agree on issues like this, there will be fewer issues to address in 14 separate state reviews.	2-19 – Due to the wide variance in PAPs among the states, Qwest proposed that this discussion occur after the LTPA collaborative has concluded and the state filings are completed. CLECs stated that it's more efficient to discuss tier designation in the LTPA collaborative especially for new PIDs. CLECs also stated that discussing tier designations for new PIDs will help reduce the variation in state PAPs going forward. State Commission staff that commented also supported using LTPA for this discussion. Qwest stated that there were some regional CLECs that are active in PAP discussions but do not have the resources to participate in LTPA. All parties agreed to review how best to notice regional CLECs that LTPA will discuss tier designations with new PIDs. This issue will be discussed again on the 2/26 LTPA call. 2/26 – The Iowa Commission agreed to circulate a questionnaire to determine if all	2/19 – Open 2/26 – Open 6/2 -- Closed

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					state staff agree that some PAP issues should be included in the LTPA collaborative. Staff will respond to Iowa by 3/7. This issue will be discussed at the 3/11 LTPA meeting in Denver. 6/2 – State staff will review this proposal.	
35a	Administrative clean-up of PID documentation	Qwest	Provide a redlined version of the PID that addresses various administrative categories for input from the LTPA participants.	To increase completeness, accuracy, consistency, and understandability of the PID document. Categories include: <ul style="list-style-type: none"> – Correct typographical or administrative errors: <ul style="list-style-type: none"> ▪ E.g.: For PO-16, the wrong PID draft was used to update the 14-state Version 5.0 PID and some of the redlined changes were inadvertently omitted from the document. Would replace with correct draft. – Remove and archive outdated information: <ul style="list-style-type: none"> ▪ E.g.: Remove or modify information in the Notes and Availability sections that refer to activities that occurred more than twelve months ago and are no longer meaningful to the current Performance Measurement reports (e.g., OP-3). – Increase consistency of language with underlying process: <ul style="list-style-type: none"> ▪ E.g.: For OP-3, OP-4, & OP-6, remove “Unbundled Loop – Analog (non-designed)” from the Product Reporting section under MSA-Type Disaggregation because all analog loops go 	11/13 – Issue will be discussed on Dec. 4 12/4 – Issue divided between administrative clean-up (35a) and inconsistencies (35b). Issue 35b will be discussed at a later time. Qwest will attempt to respond to issues raised by various parties by Dec. 11. Two issues were considered substantive and will be discussed on Dec. 11. The first involves a proposal by Qwest to delete the first note in PO1 (See Issue 15a) The second involves a proposal by Qwest to modify the term “trouble reports.” (See issue 14b) All proposals were agreed-to except for proposals with outstanding action items and issues deferred for separate discussions. 12/11 – Qwest responded to the 12/4 action items: 1. Qwest agreed to post the June 2002 version of the PIDs and all subsequent updates to the PIDs on its web site. Older, individual versions of the PIDs will be sent to CLECs upon request but will not be posted to the web site. 2. In lieu of including PAP-specific standards in the PIDs, CLECs offered to	12/4 – Open 1/8 –Closed, pending completion of various action items. 1/15 – Closed pending CLEC review of LTPA website. 1/22 -- Closed

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				<p>because all analog loops go through the designed provisioning process (i.e., Zone-Type Disaggregation).</p> <ul style="list-style-type: none"> - Increase consistency of language among PIDs and/or with other regulatory documents: <ul style="list-style-type: none"> ▪ E.g.: For OP-3, OP-4, OP-5, OP-6, OP-15, MR-5, MR-6, MR-7, MR-8, & Glossary of Acronyms, change "Enhanced Extended Links" to "Enhanced Extended Loops" to be consistent with other regulatory-based documents (e.g., SGATs, SIGs). ▪ E.g., For OP-17, some of the MRs, and NI-1, change "trouble report" to "provisioning trouble report" or "repair trouble report" as applicable to be consistent with OP-5. - Increase consistency of content within sections among PIDs: <ul style="list-style-type: none"> ▪ E.g.: In the Exclusions section, organize exclusions between those that apply to the numerators, denominators, or both and between those that are data exceptions versus PID policy exclusions. - Add new table to each PID reflecting status of state approval when appropriate. <p>* Examples provided are not all-inclusive.</p>	<p>include a footnote at the beginning to indicate that other measures and/or standards may be included in state PAPs. Qwest to review this proposal.</p> <p>3. Qwest agreed to modify Ex. B of the SGAT to correct errors (e.g., GA -1 to remove 1B and 1C and add 1D and PO-16). Qwest to circulate red-line PIDs by 12/15. On the next call parties will determine if administrative changes (Issue 35a) should be included in these various state filings.</p> <p>4. Qwest agreed to reinsert PO-1A 6 in the disaggregation reporting section.</p> <p>5. Qwest provided the dates when LLS was removed from DB-1.</p> <p>6. Parties agreed to remove the footnote for MR-6 because it has no relevance to this PID.</p> <p>Qwest will provide an update on the status of the Minnesota Wholesale Service Quality appeal and inclusion of new OP-5.</p> <p>12/18 – Agreement was reached on using hyperlinks to go directly to the Definition section of the PIDs for Qwest-specific terms. Qwest also indicated that the new OP-5 will be included in the MN Wholesale Service Quality plan. It was also agreed that Qwest would file the administrative changes to the PIDs at the same time they file to update Ex. B of the SGAT in various states.</p>	

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					<p>1/8 – Qwest responded to various action items:</p> <ol style="list-style-type: none"> 1. Qwest will provide a test URL next week for the LTPA Website. 2. Qwest distributed its list of proposed Hyperlink terms. Parties agreed to add, "Lack of Facilities" to the list. <p>1/15 – Qwest provided a brief overview of the LTPA website. CLECs will review by 1/22.</p> <p>1/22 –CLECs requested and Qwest agreed to include impasse documents on the website. According to Qwest, the website should be operational by Feb. 5.</p>	
35b	Various PIDs	Qwest	Modify PIDs to correct inconsistencies.		3/4 – Qwest has withdrawn this general proposal and agreed to identify any inconsistencies when discussing specific PID proposals.	3/4 -- Closed
36	Various PIDs	Eschelon	Modify PIDs to include product disaggregations for batch hot cut.	Current PIDs do not have disaggregations for batch hot cuts.	2/19 – All parties agreed that the BHC process was still a work in progress as both industry collaboratives and CMP continue to define the process. Parties agreed to give priority to BHC PIDs after the process is defined. This discussion will occur at the next 6 month LTPA collaborative or an Ad Hoc meeting if the BHC process is defined earlier.	2/19 -- Closed
37	Format of PID Reports	AT&T MCI US Link	Replace or enhance the PDF format so that data can be placed in a spreadsheet.	Revised format will allow individuals using the data to cut and paste, as opposed to re-typing, from one report to another,	1/29 – Qwest will research this proposal and begin to develop a revised format. Issue will be discussed again on the 2/12 LTPA call.	1/29 – Open 2/12 --Closed

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					2/12 – CLECs agreed to a proposal by Qwest to produce a Comma Separated Value data file each month that can be imported into Excel, MS Access or any database application. In the future, Qwest will investigate sending this data in a ZIP file.	
38	Various PIDs	Qwest	Address criteria by which a parity standard or benchmark is set for PIDs; and subsequently whether parity standards for specific PIDs should be changed to benchmarks.	On 1-29-04, the LTPA discussed the CLEC proposal to move from parity standards to benchmarks for DS-1 loops in OP-3 and OP-4 for DS-1. In that discussion, the possibility of changing standards for other PIDs was raised. This issue is to determine the analytical framework that would be used in determining whether parity and benchmark standards should be changed. The specific PIDs whose standards are to be readdressed are to be determined after the framework is agreed upon.	2/26 – Parties agreed to defer this issue until the next LTPA collaborative. Parties also agreed to exchange white papers outlining their respective criteria for parity vs. benchmarks 6 weeks after the conclusion of this LTPA collaborative. Parties also agreed to develop a time line for the next LTPA collaborative at the end of this collaborative.	2/26 - Closed

Worksheet Key	
Proposal Number	Sequential numbering of proposals – numbering to be assigned in final version of worksheet (2/28) once all proposals are in so that related proposals (e.g. same PM) will be grouped together numerically.
PID# or Subject	PID number the proposal applies to or a short title of the subject of the proposal.
Proposed By (Who)	Identification of the party making the proposal
Proposal (What)	A complete description of the proposal being made, including text for the business rules that reflect the letter and intent of the proposal
Rationale for Proposal (Why)	Explanation, in detail, of why the proposing party feels this proposal has merit and should be accepted. Can refer to additional documentation the party provides which supports the proposal.
Alternative Proposal/Position	Alternate proposals, if any, along with a statement of position by the other party or parties stating positions.
Status of Proposal	Field to track the status of the proposal – Open, Deferred, Agreed to Original Proposal, Agreed to Alternate Proposal

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