

**BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION**

IN THE MATTER OF QWEST	)	
CORPORATION'S SECTION 271	)	
APPLICATION AND MOTION FOR	)	
ALTERNATIVE PROCEDURE TO	)	Utility Case Number 3269
MANAGE THE SECTION 271 PROCESS	)	
	)	

**MOTION FOR RECONSIDERATION OF PORTIONS OF ORDER REGARDING FACILITATOR'S REPORT ON CHECKLIST ITEMS 2, 4, 5 AND 6 AND DEMONSTRATION OF COMPLIANCE**

**INTRODUCTION**

Pursuant to 17.1.2.39.6 NMAC, Qwest Corporation ("Qwest") submits this motion for reconsideration of three issues in the Commission's Order Regarding the Facilitator's Report on Checklist Item 2 (Access to Unbundled Network Elements), Checklist Item 4 (Access to Unbundled Loops), Checklist Item 5 (Access to Unbundled Local Transport), and Checklist Item 6 (Access to Unbundled Local Switching) (hereinafter "Group 4 Order") and to demonstrate its compliance with the Commission's outstanding concerns relating to checklist item 4, access to unbundled loops.

Qwest requests that the Commission reconsider the following issues:

- The requirement that Qwest create the functionality for CLECs to perform mechanized loop tests ("MLTs") on a pre-order basis. The current Raw Loop Data tool provides loop length information, the ROC is already testing the extent to which Qwest provides access to loop qualification information at parity, and current FCC orders do not require Qwest to create this functionality.
- The modification to the facilitator's recommended resolution of the issue of access to spare facility information when significant amounts of integrated digital loop carrier ("IDLC") are present. The Commission modified the suggested SGAT language to require Qwest to provide "unmediated" access to loop qualification information these instances. However, "unmediated" access is no different than the

qualification.<sup>33</sup> Thus, to make it capable of handling "queries" would be a significant, and costly, undertaking.<sup>34</sup> The Commission does not address this aspect of the implications of ordering "unmediated" access to loop qualification and spare facility information.

As the Commission notes in its Group 4 Order, at the time of the workshops, Qwest was in the process of enhancing its Raw Loop Data tool to include spare facility information.<sup>35</sup> These enhancements are now completed. In its August 2001 IMA Release 8.0, Qwest modified the Raw Loop Data tool to include spare or unassigned facilities and partially connected facilities. IMA Release 8.0 added a loop status field to the Raw Loop Data tool. If the facility is associated with a working telephone number, then the data would be obtained using the "Assigned Address" query, and the Loop Status would show as "WKG" for working. Attachment 1 is a copy of an "Assigned Address" query. The "Unassigned Address" query returns the spare facilities, and the Loop Status is indicated as "CT," which means the facility is connected through to the central office, or "PCF," which means it is partially connected through (i.e., a segment). Attachment 2 contains an example of each type of spare facility.<sup>36</sup> Qwest has even modified its training to teach CLECs how to obtain such information. Additionally, using the IMA Facility Check tool, the CLECs have the ability to determine if facilities exist to support the requested unbundled loop.

However, if the Commission's Order is interpreted to require Qwest to provide *unmediated* access to loop qualification information, then these enhancements will have been largely pointless. The Commission could not have intended its order to extend so far. Qwest respectfully requests that the Commission modify this aspect of its order to permit Qwest to provide mediated access to spare facility or other loop make up information.

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<sup>33</sup> May 1, 2001 Tr. at 88, 98, 101.

<sup>34</sup> *Id.* at 98-99.

<sup>35</sup> Group 4 Order ¶ 137.

<sup>36</sup> Attachments 1 and 2 have been redacted to remove customer-identifying information, such as telephone numbers or street addresses.

**CONCLUSION**

The Commission should revise its Order on the issues for which Qwest seeks reconsideration. On all issues, the Commission should find that Qwest complies with the requirements of checklist item 4, subject to satisfactory performance in the ROC process.

DATED this 14th day of December, 2001

Respectfully submitted,

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