## EXHIBIT E

## CHRONOLOGY OF PLOC FREEZE CMP ISSUES

A brief chronology and summary of events follows, commencing with the submission of an AT&T CR (business-to-business discussions had been ongoing since February 22, 2002 regarding this issue)<sup>1</sup>.

## CHRONOLOGY

March 8, 2002, AT&T submitted CR #PC 030802-1 to CMP requesting a process for the removal of the Local Service Freeze from Qwest residential accounts.<sup>2</sup> AT&T initiated this CR because the information contained in the PCAT regarding the local freeze was incomplete and inaccurate.

March 14, 2002, AT&T's Service Manager at Qwest informs AT&T "that as Local Service Freeze issues are not being addressed through CMP and that Qwest is in litigation regarding Local Service Freeze, that all discussion regarding this topic should remain in these same arenas. The Qwest Team in attendance of the Broad Band call will not be prepared to discuss any policy issues regarding Local Service Freeze on the call. I would suggest that any questions you have be addressed through CMP." This Qwest position shut the door to the Service Manager who is the normal avenue for resolution of issues impacting AT&T's ability to process orders with Qwest. In addition, it aggravated the situation because CMP is too slow and cumbersome to effectively resolve customer impacts real time.

March 18, 2002, Qwest held the clarification call on AT&T's CR PC030802-1. AT&T submitted its request to CMP that CR PC 030802-1 be expedited under the CMP

<sup>&</sup>lt;sup>1</sup> Attachment 1 is a redacted e-mail message with minutes from a regularly scheduled quality call between Qwest and AT&T held on March 1, 2002. Issue 5 deals with the Local Service Freeze.

<sup>&</sup>lt;sup>2</sup> Attachment 2 is a copy of CR PC030802-1.

Exception Process. This request was discussed at the CMP Product/Process meeting held on March 20, 2002, and the CMP body approved processing this request as an exception to the normal CMP procedures.<sup>3</sup> A few of the problems identified in this letter include: (i) customer required to call Qwest multiple times to remove LEFV, (ii) no established process to remove the LEFV at the Qwest retail offices, (iii) inconsistent information between the account team and the PCAT pertaining to submission of the LSR, (iv) inconsistent process between removing the LEFV and the updating of the CSR.

March 26, 2002, a meeting was held between Qwest and CLECs on the Local Service Freeze issue. Instead of problem solving, Qwest treated it as another clarification call and did not bring operations subject matter experts who could fashion a resolution to the problems.<sup>4</sup>

March 29, 2002, AT&T Broadband Phone of Washington, LLC, filed a formal complaint with the Washington Utilities and Transportation Commission over Qwest's implementation of the Local Service Freeze.<sup>5</sup>

April 4, 2002, another meeting was held between Qwest and CLECs to further discuss the issue. Qwest was only prepared to discuss a letter it had sent answering questions raised by AT&T.<sup>6</sup> Qwest, again, was not in a position to discuss process changes to resolve the local freeze issues, because operational subject matter experts were not in attendance. AT&T requested again that Qwest suspend the local service

<sup>&</sup>lt;sup>3</sup> AT&T's March 18, 2002, letter from Terry Bahner to Todd Mead of Qwest is Attachment 3.

<sup>&</sup>lt;sup>4</sup> Attachment 4 is a letter dated March 28, 2002, from Terry Bahner, AT&T, to Todd Mead, Qwest, expressing disappointment with the March 26<sup>th</sup> meeting and the absence of appropriate Qwest subject matter experts from the meeting.

<sup>&</sup>lt;sup>5</sup> Attachment 5 is a copy of the AT&T complaint filed in Washington on March 29, 2002.

<sup>&</sup>lt;sup>6</sup> Attachment 6 is a letter dated April 2, 2002, from Harriett Berry, Qwest, to Terry Bahner, AT&T.

freeze as an offering until it develops an effective process to remove a freeze on an account.<sup>7</sup>

April 5, 2002, Qwest sent a message to AT&T and others stating that it had not determined whether it will lift the Local Service Freeze offering, but continued to consider the request. Another status update is to be provided on April 8, 2002.<sup>8</sup>

There are several facets to the problems AT&T has experienced dealing with removal of the Local Service Freeze from customer accounts:

i) Qwest introduced a change in it systems and/or process the caused the rejection of LSRs due to a Local Service Freeze being in place. AT&T's daily operations have been adversely impacted by this change and Qwest has not been able to promptly and effectively address these impacts. When AT&T employed the normal process of reporting and escalating these troubles, AT&T found that Qwest personnel did not know about the Local Service Freeze and did not know how to resolve the problems AT&T was experiencing;

ii) AT&T tried to work with its Service Manager at Qwest, however, the Service Manager directed AT&T to employ the CMP to resolve the time critical impacts caused by Qwest's inability to remove the Local Service Freeze from customer accounts. The CR process in CMP is not designed to resolve immediate customer-impacting problems, because implementation of a CR takes months;
(iii) AT&T submitted a CR to CMP on the Local Service Freeze and requested that the CR be expedited under the CR "exception" process. AT&T's expectation

<sup>&</sup>lt;sup>7</sup> Attachment 7 is a letter dated April 5, 2002, from Terry Bahner, AT&T, to Todd Mead, Qwest, expressing disappointment with April 4, 2002 meeting, where no progress was made toward resolving the problems AT&T encounters when trying to have a local service freeze lifted from a Qwest retail account. <sup>8</sup> Attachment 8 is an e-mail dated April 5, 2002, from Todd Mead, Qwest, to various recipients.

was that the CR exception process would result in a prompt disposition of AT&T's CR with heightened attention to the problem by Qwest. This expectation has not been met. In the three weeks since AT&T invoked the CR exception process, there have been two meetings but virtually no progress has been made in establishing a process to lift the Local Service Freeze from customer accounts without a workaround and rescheduling the customer due date.

iv) Because Qwest cannot promptly remove a Local Service Freeze and allow the processing of LSRs, Qwest was not prepared for the implementation of the Local Service Freeze offering. Qwest should not have implemented the offering until such processes were in place.