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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of those
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST Communications,
Inc.'s Statement of Generally Available Terms
Pursuant to Section 252(f) of the
Telecommunications Act of 1996

Docket No. UT-003040

**QWEST'S STATUS REPORT RE
AUTOMATION OF THE SUBLOOP
ORDERING PROCESS**

In its 28th Supplemental Order (*28th Order*), the Washington Utilities and Transportation Commission (Commission) required Qwest to “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.” *28th Order* at ¶263. As detailed below, the Qwest ordering system can now accept a Local Service Request (LSR) for subloops.

1. In the workshop, the specific area of concern identified by AT&T was the ability to order and obtain subloop elements in Multiple Tenant Environments (MTEs). In MTEs, the most frequently sought subloop element is “intra-building cable,” (IBC) or the wires inside the MTE itself such as riser cable.

2. The Commission found that “[t]he LSR process for ordering subloops from Qwest is a manual process.” *28th Order* at ¶198. As a result, the Commission “urge[d] Qwest to automate the LSR process for subloop orders as soon as practicable.” *28th Order* at ¶103. Qwest has already

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1 completed that work.

2 3. The process for ordering subloops and submitting LSRs in Washington is automated as
3 CLECs can submit an LSR for Unbundled Feeder Loop (UFL), Unbundled Distribution Loop (UDL),
4 and intra-building cable subloops using the automated Interconnect Mediated Access (IMA) system. In
5 addition, the CLEC can still fax their subloop request (including IBC) to (888) 796-9089. To submit an
6 order, or LSR, for intra-building cable, Qwest has created a defined process. That process is detailed in
7 Qwest's Wholesale Product Catalog (PCAT). See Exhibit 1 at pages 8-10 ("Ordering"). This subloop
8 PCAT version 6.0 is currently on the Qwest web site at
9 <http://www.qwest.com/wholesale/pcat/subloop.html>.¹

10 4. The PCAT outlines the steps that a CLEC must follow to submit a LSR for intra-building
11 cable. This specific process depends upon whether the LSR is sent before or after the CLEC meet point
12 information (Alternate Point of Termination (APOT)) circuit identification process has been completed. It
13 also describes how the CLEC should inform Qwest that it wants to run the jumper to provision the intra-
14 building cable subloop element. *Id.* at 10. The PCAT also contains a number of "hot links" to other
15 useful information about the ordering process generally. This detail includes, for example, "detailed
16 information regarding LSR field entry requirements" and how to access intra-building cable "prior to
17 completion of the MTE-POI." *Id.* at 9-10.

18 5. The CLEC can submit the LSR to Qwest through either the IMA-GUI or IMA-EDI
19 interfaces. The LSR submitted can be for the subloop alone, or for subloop with number portability.

20 6. CLECs order subloops in IMA using NC/NCI codes. The two standard NC/NCI
21 codes to order IBC in IMA have been loaded. However, Qwest further clarifies that it is in the process
22 of reviewing if additional codes for IBC will be necessary to allow ordering of spectrum management
23 related interfaces. To the extent that additional codes are required, Qwest will do a PCAT and technical
24 publication update via the Change Management Process (CMP) to inform CLECs about these additional

25 ¹ On April 11, 2002, Qwest will file an updated Subloop PCAT (Version 7.0). The only significant change in version
26 7.0 is the addition of a general discussion of geographic deaveraging zones and a link to the relevant web site for
specific information.

1 NC/NCI codes and to provide clarification on their use for IBC subloops.

2 7. Thus, the Commission's desire that Qwest automate the process for submitting LSRs to
3 order subloop elements is already complete and available to CLECs today.

4 Dated this 10th day of April, 2002.

5 QWEST CORPORATION

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