

3.4 QWEST INITIATED PRODUCT/PROCESS CHANGE PROCESS

[March 19, 2002, CMP Redesign: Following is a process Qwest will implement as Qwest and CLECs further evaluate and modify it. Further action will be taken by the CMP Redesign team as follows. CLECs and Qwest will review product/process notices issued over the last few months in order to make the list of categories in each "Level" more exhaustive. This initial effort should be completed by April 16, 2002. After this review, CLECs and Qwest will baseline this process, add it to the Interim draft master redline document and implement it as modified.]

The following defines four levels of Qwest-initiated product/process changes and the process by which Qwest will initiate and implement these changes. None of the following shall be construed to supersede timelines or provisions mandated by federal or state regulatory authorities, certain CLEC facing websites (e.g. ICONN and Network Disclosures) or individual interconnection agreements. The lists provided below are exhaustive/ finite, but may be modified by agreement of the parties [Discuss how the levels will be modified long term]. Qwest will utilize these lists when determining the disposition (e.g. level 1–4) to which new changes should be categorized. The changes that go through these processes are not changes to systems.

3.4.1 Level 1 changes

Level 1 changes are defined as changes that do not alter CLEC operating procedures or are time critical corrections. Time critical changes may alter CLEC operating procedures, but only if such changes have first been implemented through the appropriate procedure under CMP for such changes. Level 1 changes are effective immediately upon notice. In the event the CLEC believes that its operating procedures are altered by the change, the CLEC will immediately notify the Qwest CMP manager by e-mail. Qwest will promptly respond to the CLEC and work to resolve the issue.

Level 1 change categories are:

- Verbiage clarifications/wordsmithing
- Providing additional information such as:
 - Additional information regarding existing products (e.g. Premium Listing)
 - Documentation concerning existing processes not previously documented (e.g. inside wiring)
 - New feature downloadable within a PCAT for existing feature not previously documented
- Corrections that do not change the initial purpose of a document
- Corrections to synch up documentation with systems capabilities
- Modifications to frequently asked questions
- Re-notifications issued within 6 months after initial notification (notice will include reference to date of initial notification)
- Training schedule changes (note: training schedules are posted quarterly, if a class is cancelled, notification is provided 2 weeks in advance. If a class is added, it is posted as soon as possible)
- Typo corrections, grammar corrections, product branding changes
- Update Invalid Contact Information

- Update Contacts lists when contact no longer work for Qwest (e.g. Escalation Contacts List)
- Contact information updates from organizational changes
- URL changes with redirect link

For any change that Qwest considers a Level 1 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

3.4.1.1 Level 1 Process/Deliverables

For Level 1 changes, Qwest will provide a notification to CLECs. Level 1 notifications will state the disposition (e.g. level 1), description of change, changes are effective immediately, that there is no comment cycle and will advise CLECs to contact the CMP Manager immediately if the change alters the CLECs operating procedures and requires Qwest's assistance to resolve. In addition, Qwest will provide the following for PCAT and NonFCC Technical Publication ("Tech Pub") changes:

- A web notification form that includes an exact cut and paste of the changes highlighted in green (PCAT) or redlined (Technical Publications). If necessary, additional text above and below the changes will be provided for context.
- A history log that tracks the changes

Note: For typo corrections, grammar corrections, and product branding changes to PCATs and NonFCC Tech Pubs notifications, web change forms will not be provided. The changes will be documented in the history log for the document to which the changes were made.

3.4.2 Level 2 changes

Level 2 changes are defined as changes that have minimal effect on CLEC operating procedures. Qwest will provide notice of Level 2 changes at least 21 calendar days prior to implementation.

Level 2 change categories are:

- Email address changes
- TN changes
- FAX TN changes
- Changes to existing Web content
 - Remove data stored under archive links after certain time period
 - Eliminate a re-direct link
 - Add new functionality (e.g. CNLA)
- Re-notifications issued 6 months or more after the initial notification (notice will include reference to date of initial notification)
- Updates (e.g. CLEC Questionnaire)

For any change that Qwest considers a Level 2 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

3.4.2.1 Level 2 Process/Deliverables

For Level 2 changes, Qwest will provide a notice to CLECs. Level 2 notifications will state the disposition (e.g. level 2), description of change, proposed implementation date,

and CLEC/Qwest comment cycle timeframes. In addition to the notice, any documentation changes required to PCATs and Non-FCC Tech Pubs (red-line for Tech Pubs and green highlights for PCATs) will be available for review in the Document Review section of the CMP Website (<http://www.qwest.com/wholesale/cmp/review.html>), commonly known as the document review site. In the document review site, a comment button will be available next to the document to allow CLECs to provide comments. For Level 2 changes that do not impact PCATs or NonFCC Tech Pubs, a comments link will be provided within the notification for comments.

Qwest must provide initial notice of Level 2 changes at least 21 calendar days prior to implementation and adhere to the following comment cycle:

- CLECs have 7 calendar days following initial notification of the change to provide written comments on the notice
- Qwest will reply to CLEC comments no later than 7 calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date.
- Qwest will implement no sooner than 21 calendar days from the initial notification.

CLECs may provide General comments regarding the change (e.g., clarification, request for modification). Comments must be provided during the comments cycle as outlined for level 2 changes.

For general comments, Qwest will respond to comments and provide a final notice of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and NonFCC Tech Pubs available to CLECs and implement the change(s) according to the timeframes put forth above. If there are no CLEC comments, a final notice will not be provided and the changes will be effective according to the date provided in the original notification.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate or pursue dispute resolution in accordance with the agreed upon CMP Escalation or Dispute Resolution procedures.

3.4.3 Level 3 changes

Level 3 changes are defined as changes that have moderate effect on CLEC operating procedures and require more lead-time before implementation than Level 2 changes. Qwest will provide initial notice of Level 3 changes at least 31 calendar days prior to implementation.

Level 3 change categories are:

- Changes to whether fields are required
 - Use of manual handling field during manual process
- NC/NCI code changes
- Product enhancements (excluding resale) that do not drive new processes
- Customer-facing Center hour changes
- New manual process
 - Feature verification for large CSRs
 - Working TNs for Resale Centrex

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- Modify/change existing manual process
 - Change manual reject reasons
 - Modify manual jeopardy form
- Change CLEC facing process to improve process gaps
 - Service/Account Manager identifies a gap in process based on a CLEC ADHOC inquiry

3.4.3.1 Level 3 Process/Deliverables

For Level 3 changes, Qwest will provide a notice to CLECs. Level 3 notifications will state the disposition (e.g. level 3), description of change, proposed implementation date, and CLEC/Qwest comment cycle timeframes. For Level 3 notifications that Qwest believes represent a new change category under Level 1 or Level 2, Qwest should propose such new change category in the notice and CLECs and Qwest will discuss the proposal in the next monthly Product & Process CMP meeting. In addition to the notice, any documentation changes required to PCATs and Non-FCC Tech Pubs (red-line for Tech Pubs and green highlights for PCATs) will be available for review in the Document Review section of the CMP Website (<http://www.qwest.com/wholesale/cmp/review.html>), commonly known as the document review site. In the document review site, a comment button will be available next to the document to allow CLECs to provide written comments. For Level 3 changes that do not impact PCATs or Non-FCC Tech pubs, a link will be provided within the notification for comments.

Qwest will provide initial notice of Level 3 changes at least 31 calendar days prior to implementation and adhere to the following comment cycle:

- CLECs have 15 calendar days following initial notification of the change to provide written comments on the notice
- Qwest will reply to CLEC comments no later than 15 calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date. In the event there are extenuating circumstances, (e.g. requested change requires significant research, information is required from national standards body or industry (e.g. Telcordia)), Qwest's response will indicate the course of action Qwest is taking and Qwest will provide additional information when available. Once the information is available Qwest will provide a notification and any available updated documentation (e.g. Tech Pubs, PCATs) at least 15 calendar days prior to implementation.
- Qwest will implement no sooner than 15 calendar days after providing the response to CLEC comments. For example, if there are no CLEC comments, Qwest may send out a final notification on the first day following the CLEC cut-off for comments (day 16 after the initial notification). Thus, implementation would be 31 days from the initial notification. However, if Qwest does not respond to the CLEC comments until the 15th day after the CLEC cut-off for comments, the earliest possible implementation date would be 45 calendar days from the initial notification.

CLEC comments must be provided during the comment cycle as outlined for Level 3 changes. Comments may be one of the following:

- General comments regarding the change (e.g., clarification, request for modification)
- Request to change disposition of Level. If the request is for a change to Level 4, the request must include substantive information to warrant a change in disposition (e.g. business need, financial impact).

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- Request to change disposition to a Level 1 or Level 2 doesn't have to include substantive information to warrant a change.
- Request for postponement of implementation date, or effective date

For general comments, Qwest will respond to comments and provide a final notice of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and NonFCC Tech Pubs available to CLECs and implement the change(s) according to the timeframes put forth above.

CLECs and Qwest will discuss requests to change the disposition Level of noticed changes, or to establish new change categories under Levels 1 – 4, at the next monthly Product & Process CMP meeting. In the event that the parties are not able to reach consensus on any such request, CLECs and Qwest will take a vote of the parties in attendance at the meeting. The result will be determined by the majority. If the disposition Level of a change is modified, from the date of the modification forward such change will proceed under the modified Level. When a change to the disposition Level of a particular notice also suggests that a new category of change be established under one of the Levels, a separate vote shall be taken for each.

For a request for postponement, Qwest will follow the procedures as outlined in Section 4 of this document.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate or pursue dispute resolution in accordance with the agreed upon CMP Escalation or Dispute Resolution procedures.

3.4.4 Level 4 Changes

Level 4 changes are defined as changes that have a major effect on existing CLEC operating procedures or that require the development of new procedures. Level 4 changes will be initiated using the CMP CR process and provide CLEC an opportunity to have input into the development of the change prior to implementation.

Level 4 change categories are:

- New products, features, services (excluding resale)
- Interval changes
 - Increase FOC to 72 hours
 - Changes to Standard Interval Guide (SIG)
 - Change a wire center's status of MSA/ nonMSA or Zone 1 or 2 distinction resulting in a change to the M&R and Provisioning interval
- Change to a pre-order step
 - Need to populate appointment scheduler
 - Check facility availability
- New processes related to product enhancements
 - Add Shared Distribution Loop as an additional sub-loop element
 - Extension tech on UBL
 - New features with new processes
- New PCAT for new processes

3.4.4.1 Level 4 Process/Deliverables

Qwest will submit a completed Change Request no later than 14 calendar days prior to the CMP Product and Process Monthly Meeting. At a minimum, each Change Request will include the following information:

- A description of the proposed change
- A proposed implementation date (if known)
- Indication of the reason for change (e.g., regulatory mandate)
- Basis for disposition of level 4

Within two (2) business days from receipt of the CR:

- The Qwest CMP manager assigns a CR Number and logs the CR into the CMP Database.
- The Qwest CMP Manager forwards the CR to the CMP Group Manager,
- The Qwest CMP manager sends acknowledgment of receipt to the CR submitter and updates the CMP Database.

Within two (2) business days after acknowledgement,

- The Qwest CMP Manager posts the complete CR to the CMP Web site
- The CMP Group Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate Director responsible for the CR
- The CRPM identifies the CR subject matter expert (SME) and the SME's Director.
- The CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
 - Description of CR
 - Assigned CRPM
 - Assigned CR number
 - Designated Qwest SME(s) and associated director(s)

Qwest will present the Change Request at the monthly Product and Process CMP meeting. The purpose of the presentation will be to:

- Clarify the proposal with the CLECs
- Confirm the disposition (e.g., level 4) of the Change (see below). If during the CMP meeting CLECs agree to change the disposition, then the type of change being made will be added to the list for the disposition to which it is changed.
- Propose suggested input approach (e.g., a 2 hour meeting, 4 meetings over a two week period, etc.), and obtain consensus for input approach.
- Confirm deadline, if change is mandated
- Provide proposed implementation date, if applicable

At the monthly CMP meeting, the parties will discuss whether to treat the Change Request as a Level 4 change. If the parties agree, the Change Request will be reclassified as a Level 1, 2 or 3 change, and the change will follow the process set forth above for Level 1, 2, or 3 changes, as applicable. If the parties do not agree to reclassify the Change Request as a Level 1, 2 or 3 change, the following process will apply:

- The parties will develop a process for Qwest to obtain CLEC input into the proposed change. Examples of processes for input include, but are not limited to, one-day conferences, multi-day conferences, or written comment cycles.

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- After completion of the input cycle, as defined during the CMP meeting, Qwest will modify the CR, if necessary, and design the solution considering all CLEC input.
- For Level 4 changes, when the solution is designed and all documentation is available for review, a notice of the planned change is provided to the CLECs. This notice will be provided at least 31 calendar days prior to implementation. The notice will contain reference to the original CR, proposed implementation date, and the CLEC/Qwest comment cycle. In addition, any documentation changes required to PCATs and Non-FCC Tech Pubs will be available for review in the document review site (red-line for Tech Pubs and Red-line for Tech Pubs) with a Comment button available to provide written comments. For Level 4 changes that do not impact PCATs or NonFCC Tech Pubs, a comments link will be provided within the notification.
- CLECs have 15 calendar days following notification of the planned change to provide written comments on the notice
- Qwest will reply to CLEC comments no later than 15 calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date. In the event there are extenuating circumstances, (e.g. requested change requires significant research, information is required from national standards body or industry (e.g. Telcordia)), Qwest's response will indicate the course of action Qwest is taking and Qwest will provide additional information when available. Once the information is available Qwest will provide a notification and any available updated documentation (e.g. Tech Pubs, PCATs) at least 15 calendar days prior to implementation.
- Qwest will implement no sooner than 15 calendar days after providing the response to CLEC comments. For example, if there are no CLEC comments, Qwest may send out a final notification on the first day following the CLEC cut-off for comments (day 16 after the initial notification). Thus, implementation would be 31 days from the initial notification. However, if Qwest does not respond to the CLEC comments until the 15th day after the CLEC cut-off for comments, the earliest possible implementation date would be 45 calendar days from the initial notification.

CLEC comments must be provided during the comment cycle as outlined for Level 4. CLEC comments may be one of the following:

- General comments regarding the change (e.g., clarification, request for modification)
- Request for stay or delay implementation, or effective date for which comments are being provided.

For general comments, Qwest will respond to comments and provide a final notice of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and NonFCC Tech Pubs available to CLECs and implement the change(s) according to the timeframes put forth above.

For a request to stay or delay, Qwest will follow the procedures as outlined in Section 4 of this document.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate the CR or pursue dispute resolution in accordance with the agreed upon CMP Escalation or Dispute Resolution procedures.