

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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

**AFFIDAVIT OF JUDITH M. SCHULTZ IN RESPONSE TO
JOINT CLEC BRIEF REGARDING QWEST'S CHANGE MANAGEMENT PROCESS**

1. My name is Judith M. Schultz. I am a Director in the Qwest Corporation wholesale service delivery organization. My office is located at 1005 17th Street, Denver, Colorado. I am currently Director -- Change Management and am responsible for directing the change management process redesign effort and managing the implementation of Qwest's change management process.

2. In this affidavit, I address some of the Joint CLECs' claims regarding Qwest's Change Management Process ("CMP").

3. Exhibit A to the Joint CLEC Brief contains the lists of priority items the CLECs identified as the most important items for discussion and identification of potential impasse issues. The more important issues that may result in impasse were identified as "1's" and the less important issues that were not likely to result in impasse were identified as "0's." The version of the lists Joint CLECs submitted was not the most current version. The most current version of those lists, dated April 4,

2002, is attached to this affidavit as Exhibit A. This version indicates whether the redesign team reached agreement in concept and whether the team agreed to detailed language regarding these issues.

4. The redesign team reached agreement in principle regarding all twelve of the "1" issues and on eight of the ten "0" issues. Of those issues, detailed proposals have been developed for all issues but one. This issue relates to provisions for the exception process. The team has agreed in principle to the exception process and the team agreed that this issue would not be a controversial issue. The two issues on which the team did not reach agreement in principle do not relate to language that will be incorporated into the CMP document.

5. For the "1" issues, the team agreed to specific provisions for the following four issues: I.A.9 (part 1), I.A.2, I.A.3 , and V.d. The team has discussed detailed proposed language for the following seven of the remaining eight issues: I.A.12, I.A.9 (part 2), I.A.11, I.A.1, V.c, III Part H, and I.A.6. Minor modifications may be necessary for these issues. Qwest has proposed detailed language for the final issue, I.A.7, but the team has not yet discussed it.

6. For the "0" issues, the team agreed to specific provisions for the following three of the ten issues: I.A.4, V.b, and Covad Issue #1. The team has discussed detailed proposed language for the following four of the seven remaining issues: I.A.10, I.A.5, V.e, and V.f. Minor modifications may be necessary for these issues. The team has discussed details to be included in the exception process, Covad Issue #2, but has not yet developed detailed provisions. The team does not believe this issue will be controversial. The remaining two issues, Covad Issue #3 and WorldCom, do not relate to language that will be incorporated in the CMP document. Covad Issue #3 relates to how Qwest identifies retail changes that may impact CLECs and the WorldCom issue relates to how Qwest will prove that it has implemented the changes it has agreed to make.

7. Qwest's record of actual compliance with the redesigned CMP is set forth in the matrix entitled Change Management Improvements, which is attached as Exhibit B. My team and I prepared this matrix. The information contained in it is true and correct to the best of my knowledge and belief.

8. The CLEC community provided many comments and suggestions regarding the organization and clarification of change management related materials on the website. Qwest has incorporated as many of the CLEC comments and suggestions as it could. Since July of last year, Qwest has not received any CLEC-initiated requests for a change or modification of Qwest's CMP website.

9. The Event Notification regarding NC/NCI codes attached as Exhibit I to the Joint CLEC Brief is not an example of a Qwest-originated product or process change and, therefore, is not subject to the Qwest-Initiated Product/Process Change Process. The example provided refers to an Event Notification regarding a production support issue. It simply listed outdated NC/NCI code combinations Qwest had found on the IMA NC Code Validation database. The Event Notification attached to the Joint CLEC Brief is a closure notification. It refers to the initial notification that Qwest sent to CLECs on March 4, 2002. A copy of the March 4, 2002 Event Notification is attached as Exhibit C.

10. Since 2001, Qwest has substantially revised or created 231 product catalogs ("PCATs") and 27 technical publications ("TechPubs"). Qwest notified CLECs of the opportunity for CLECs to comment or provide feedback regarding all of these PCATs and TechPubs.