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

PUBLIC VERSION

AFFIDAVIT OF ROBERT J. HUBBARD IN RESPONSE TO JOINT CLEC BRIEF REGARDING QWEST'S CHANGE MANAGEMENT PROCESS

1. My name is Robert J. Hubbard. I am a Director of Technical Regulatory in the Qwest Corporation Local Network Organization. My office is located at 700 W. Mineral Ave., Littleton, Colorado. I am responsible for the development of strategies to implement the unbundling of Qwest's network as required by the Telecommunications Act of 1996. I provide technical support regarding unbundling issues to the Qwest Network and Public Policy departments.

2. In this affidavit, I address some of the Joint CLECs' claims regarding Qwest's provisioning of ISDN loops with integrated pair gain ("IPG") or integrated digital loop carrier ("IDLC"). In this context, the terms "IPG" and "IDLC" are interchangeable in describing the condition that presented difficulties for Qwest in provisioning ISDN loops.

3. The provisioning of ISDN where IDLC is present requires the use of an INA di-group solution. The unbundling of loops where IDLC is present was presented in the Direct Testimony of Ms. Jean Liston, filed May 16, 2001, Exhibit JML-9.

4. Qwest is baffled by the sworn affidavit of Ms. Sheila Hoffman. Ms. Hoffman states that Qwest informed Covad in March of 2000 that ISDN could not be provisioned if IDLC was present. She goes on to state that Covad has not placed an orders for ISDN where IPG was present to void unnecessary work and create false customer expectations. Attachment 1 displays an Action Item list from a February 24, 2000 meeting with Covad. Item 6 on the list clearly indicates that U S WEST, now Qwest, discussed the INA solution with Covad. Additionally, it indicates that Qwest would review the Covad held orders to determine if the INA solution could be used to provision any of the Held Orders. A follow-up meeting was held on April 26, 2000.

5. Based on Qwest's records of the ISDN loops that were in service in March 2002, approximately 728 ISDN loops in Washington were served using an INA solution and 1 was hairpinned. Of these, *** were provisioned for Covad. Additionally, Qwest's records indicate that Covad has been placing orders for and receiving ISDN loops using the INA solution steadily since 1999. In 1999 there were *** ISDN loops using the INA di-group solution provisioned for Covad. Then during 2000, more than *** such loops were provisioned. During 2001, the number increased to more than *** loops and thus far in 2002, Qwest provisioned *** such loops for Covad in January and *** in February. Qwest does not understand Covad's claim that they have not placed any ISDN orders where IPG is present since March of 2000. The facts do not support Covad's allegations that they did not know they could provision ISDN loops when IDLC was present and they have not placed orders since March of 2000.

6. To provide the Commission with some background facts, retail IDSL was introduced in April 2000. Qwest retail DSL sales consultants are required to use a loop qualification tool prior to issuing a service order for DSL. If the customer cannot be served by DSL, the qualification tool will

attempt to qualify the customer for IDSL. The retail tool only indicates if the address could possibly be served by IDSL. If the customer is interested in the retail IDSL offering, an order is issued. The same assignment process is used for retail and wholesale requests. If the facility is served by IDLC, an INA di-group solution is needed to provision the retail service, the same is true for an ISDN capable loop. The retail sales representatives do not receive information regarding IDSL and IDLC, they are simply told that the facility may qualify for IDSL service.

7. Qwest introduce the ISDN capable loop in 1997 and the xDSL-I capable loop in the second quarter of 2000. The CLECs can and do provision IDSL using the ISDN capable loop. In the product description for ISDN and xDSL-I capable loop in the PCAT, the Optional Feature section mentions ISDN with IDLC. The Optional Feature section addresses the fact that Extension Technology is not applicable with the IDLC.

8. Throughout 2000, Qwest worked through the difficulties with the provisioning of loops for DSL services. Qwest's Held Order group worked directly with the CLECs, including Covad, to implement alternative solutions recommended by engineering. For instance:

- If the pending order was for a 2-wire copper loop and the community was served by pair gain, Qwest recommended an ISDN capable loop solution instead.

- If the order was for an ISDN capable loop and the facility was served by IDLC, then an INA-di-group solution was investigated. This process took several months to complete, and Qwest worked with the CLECs on this issue.

9. There were lengthy discussions during the 271 workshops regarding unbundled loops and IDLC. The discussions included the difficulties associated with unbundling a loop that is served using IDLC technology, engineering solutions for unbundling, installation intervals and Qwest's

commitment to look for ways to provision these loops. Although much of the discussion related to general IDLC issues, whenever a specific loop type was discussed, it was the analog loop. However, the IDLC unbundling solutions established during the workshops apply to all loop types. The discussions regarding unbundling of IDLC occurred in just about every state jurisdiction.

10. During the Washington workshops, the CLECs were informed that they were not required to perform a pre-order loop qualification before ordering a xDSL loop. Qwest encourages the CLECs to use the loop qualification tools, however it is not a requirement, see SGAT section 9.2.4.3.1 indicates that the CLEC "should" use one of the pre-order loop qualification tools. Based on workshop discussion, Qwest indicated that the CLECs are not required to use the tools.

11. For unbundled loops, Qwest does not perform a loop qualification process using the loop qualification tools. Instead, using the mechanized loop assignment process, LFACS, Qwest will assign compatible facilities. The same assignment process is used for Qwest retail and wholesale. If compatible facilities are not found, then Qwest will use an 11-step process to "look" for compatible facilities. The Direct testimony of Ms. Liston described the unbundling of IDLC in detail[1], including the 11-step process, Exhibit JML- 10.

12. During the 271 workshops, there was a great deal of discussion regarding the technical issues associated with unbundling IDLC. The FCC, in the UNE Remand Order recognized that the unbundling of IDLC presented great difficulties for the ILECs. . Qwest explained that it was encountering difficulties with the unbundling of IDLC. To help facilitate the provision process for these

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[1] Direct Testimony of Ms. Jean Liston filed on May 16, 2001, pages 31 – 37.

orders, Qwest created a specialized team within the QCCC to coordinate the provisioning process for coordinated installations that involved IDLC.

In addition to the dedicated team Qwest committed to unbundled IDLC, Qwest and the workshop participants discussed the IDLC unbundling decision tree, Exhibit JML- 9. To the extent that Qwest created solutions to unbundle IDLC, the solutions apply to all unbundled loop types.

13. Qwest has been providing unbundled ISDN loops that are served by IDLC technology. As presented in the engineering decision tree, one solution utilizes an INA di-group. Qwest has committed to unbundle loops served by IDLC, wherever technically feasible, and has lived up to its commitment.

14. For Covad, over 20% of their Washington ISDN loops in service utilize the ISDN INA di-group solution. Covad's claim is unfounded.

15. As of April 12, 2002, the technical publications listed below are consistent with the SGAT, with one exception, which is described below.

Publication Number	**Technical Publication Subject**
77350	Installation guidelines
77383	Dark Fiber
77384	UNE Loop
77386	Collocation and Interconnection
77389	UNE Transport

77391	UNE Switching
77398	LIS Interconnection
77403	EEL
77405	Sub-Loop
77406	Shared Loop
77408	Packet Switching

16. The only technical publication that is not fully consistent with the SGAT is Technical Publication 77391, UNE Switching, issue E.

17. Qwest posted Technical Publication 77391 to the Change Management Process (CMP) web site to allow CLECs to review and comment the Qwest proposed changes on December 28, 2001. In response to this posting, AT&T submitted comments suggesting several changes. Qwest agreed to incorporate two changes based on AT&T's comments. Issues #3 and #4 provided by AT&T on January 21, 2002 will be incorporated into Issue F of Technical Publication 77391. Those changes relate to the "*DS3 and SONET port interfaces"* and *"reference to Direct Connection method"* to access Unbundled Switch.