

UT-043007 Smith Direct
Eschelon Telecom, Inc. July 23, 2004
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)
)
Qwest Communications)
International Inc.)
)
Consolidated Application for Authority)
to Provide In-Region, InterLATA Services in)
Montana, Utah, Washington and Wyoming)

WC Docket No. 02-189

To: The Commission

REPLY COMMENTS OF
QWEST COMMUNICATIONS INTERNATIONAL INC.
IN SUPPORT OF CONSOLIDATED APPLICATION
FOR AUTHORITY TO PROVIDE IN-REGION, INTERLATA SERVICES
IN MONTANA, UTAH, WASHINGTON AND WYOMING

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August 26, 2002

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“Unbundled Loop Pending Facility” status for 30 business days. In Washington these orders remain in the “Unbundled Loop Pending Facility” status unless or until the CLEC cancels the order. During that period, the order is reported under OP-15, Interval for Pending Orders Delayed Past Due Date, until a new due date is established. ^{19/}

Covad also questions the June 2002 results reported for OP-15 in Washington. It is apparent from Covad's description of the issue that it has misunderstood the language of the PID and the requirements of the Washington order. See Williams Reply Decl. ¶¶ 66-70.

E. Metric OP-5 Accurately Tracks Qwest's Installation Quality

Covad claims that results reported under under OP-5 are unreliable and that Qwest is incapable of reconciling data within OP-5. Covad Comments at 52. Qwest calculates OP-5 according to the PID definition, which calls for counting orders in the denominator and trouble tickets in the numerator. Qwest could easily provide the orders and trouble tickets contained in OP-5 each month. Data reconciliation could therefore be accomplished, as with any provisioning or repair measurement, comparing Qwest's OP-5 orders and trouble tickets for the relevant time period to CLECs' orders and trouble records for the same time period. Although the parties chose not to do this with OP-5, it could have been and can be done. It would, however, require the CLEC to produce similar order and trouble ticket information for comparison. Covad was incapable of providing such comparable information. Thus, during data reconciliation it was decided that OP-5 would not be reconciled.

^{19/} AT&T's assertion that OP-15 has a parity standard, AT&T Comments, Finnegan Decl. ¶ 122, is wrong. The ROC TAG, after extensive discussion and consideration, agreed to designate OP-15 as a diagnostic metric. This decision was reached collaboratively, without resort to impasse or escalation.

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Results from other aspects of the data reconciliation support the results in OP-5. As to the OP-5 numerator, Liberty found that Qwest can and does properly identify and account for trouble tickets. When Liberty was focused on MR-6 (Mean Time to Restore) there were no instances where AT&T identified a trouble report when Qwest did not also identify the same trouble ticket. As to the OP-5 denominator, Liberty also found that Qwest properly identifies orders. While there were some differences between the parties on the number of orders that Qwest should exclude from the performance measures, the parties did not contend, and Liberty never issued an Observation finding, that Qwest was losing orders. Thus, as to the two key aspects of OP-5, Liberty did reconcile Qwest's ability to collect and report the information.

Liberty also audited OP-5 during its performance measurement audit and concluded that the measure generates accurate and reliable results. Thus, both the audit and reconciliation support Liberty's conclusion that OP-5 data are accurate and reliable. See Attachment 5, Appendix D, Liberty PMA Final Report.

Eschelon questions the accuracy of Qwest installations and the adequacy of Qwest's reporting on the quality of new installations, implying that Qwest's reported results for OP-5 are incomplete. Eschelon comments at 7. In fact, the PID is very clear in its description of what Qwest must report: "new order installations that were free of trouble reports." Metric OP-5 was designed to capture only situations in which trouble tickets are issued. When a CLEC reports a problem with a line or feature not indicated on the order, Qwest does not issue a trouble ticket.

Qwest recently installed a new tracking process to measure these instances and began reporting this additional information in the July results. Examination of the results for this "Service Order Accuracy" tracking tool refutes Eschelon's assertion that Qwest has a serious

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problem with service order accuracy affecting installation quality. The new data being reported are based on customer calls reporting service order accuracy problems to Qwest's service delivery centers within the reporting month of order completion. The results are reported on a statewide aggregate basis for all products listed in the OP-5 PID, providing an overall estimate of service order accuracy. The results are calculated using the same base of orders as OP-5, i.e., denominator consisting of average of current and previous months' order volumes. In July, the first month with reported results, more than 99% of the orders issued in the Montana, Utah, and Washington states were error free. ^{20/} In Wyoming, 97% of the 375 orders processed were error free. Wyoming Commercial Performance Results at 86. Furthermore, in an *ex parte* submission on August 20, 2002, Qwest provided data showing that in the four application states, manually processed service orders were 95.3% to 98.7% accurate. See Ex Parte 082002 166. These new data, coupled with implementation of PO-20, the Manual Service Order Accuracy PID, and Qwest's pending requests in each application state to include PO-20 in Qwest's Performance Assurance Plan, ^{21/} should allay any lingering concerns about Qwest's commitment to providing accurate service orders for new service installations.

F. Qwest Properly Categorized Eschelon's UNE-Star Lines As UNE-P

Eschelon asserts that "Qwest is already reporting Eschelon's UNE-E/UNE-Star lines as UNE-P lines" in Qwest's performance results. Eschelon Comments at 39. Eschelon further contends that Qwest failed to provide the requisite notice for this change, which occurred "in approximately November of 2001." *Id.* at 40.

^{20/} Montana Commercial Performance Results at 89; Utah Commercial Performance Results at 100; Washington Commercial Performance Results at 101.

^{21/} Qwest filed these requests with the State Authorities on August 19, 2002. See Section IX.A, below.