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BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

In the Matter of the)
Investigation into:)
US WEST COMMUNICATIONS, INC.'s)
)Docket No. UT 003022
Compliance with Section 271 of)Volume XLVI
the Telecommunications Act of)Pages 6633 to 6687
1996)
- - - - -	-)
In the Matter of:)
)
US WEST COMMUNICATIONS, INC.'s)Docket No. UT 003040
)Volume XLVI
Statement of Generally Available)Pages 6633 to 6687
Terms Pursuant to Section 252(f))
of the Telecommunications Act)
of 1996)

A prehearing conference in the above matters was held on April 18, 2002, at 9:30 a.m., at 1300 South Evergreen Park Drive Southwest, Room 206, Olympia, Washington, before Administrative Law Judge ANN E. RENDAHL and PAULA STRAIN.

The parties were present as follows:

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PROCEEDINGS

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JUDGE RENDAHL: Let's be on the record.

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Good morning. We're here before the Washington Utilities and Transportation Commission this morning, April 18, 2002, for a prehearing conference on dockets UT 003022 and 003040. Captioned, In The Matter of the Investigation into US West Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996, and US West's Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996.

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I am Ann Rendahl, the Administrative Law Judge presiding over this prehearing conference. The purpose of this prehearing is to prepare for the hearings scheduled for next week, April 22nd to 26th, to schedule when topics will be presented during the hearing, and to mark exhibits offered by the parties.

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Before we proceed any further, let's take appearances for the parties. We will begin with those in the room, and with Qwest.

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Ms. Anderl.

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MS. ANDERL: Thank you, Your Honor. Lisa Anderl and Adam Sherr appearing on behalf of Qwest. And I provided my address previously.

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1 JUDGE RENDAHL: Thank you. Mr. Harlow.

2 MR. HARLOW: Thank you, Your Honor. Brooks
3 Harlow appearing on behalf of Covad Communications.

4 JUDGE RENDAHL: Thank you. Mr. Kopta.

5 MR. KOPTA: Gregory Kopta, from the law firm of
6 Davis Wright Tremaine, LLP, on behalf of ELI and Time
7 Warner Telecom.

8 JUDGE RENDAHL: Thank you. And on the bridge
9 line beginning with AT&T.

10 MS. TRIBBY: Mary Tribby, Rebecca DeCook, and
11 Letty Friesen on behalf of AT&T.

12 JUDGE RENDAHL: Thank you. For Qwest.

13 MR. STEESE: Chuck Steese on behalf of Qwest.

14 JUDGE RENDAHL: Thank you. And for WorldCom.

15 MS. NELSON: Michelle Singer Nelson on behalf
16 of WorldCom.

17 JUDGE RENDAHL: Is there anyone else on the
18 bridge line?

19 COURT REPORTER: I can't hear who is speaking.

20 JUDGE RENDAHL: Good morning. That's Joanne
21 Ragge, R-a-g-g-e, from Qwest, and she's not an attorney,
22 and is listening in, to my knowledge.

23 Is that correct, Ms. Anderl?

24 MS. ANDERL: Yes.

25 JUDGE RENDAHL: Off the record we discussed a

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1 number of preliminary issues, the first being the issue
2 of testimony by attorneys in this hearing. This
3 proceeding is a little bit odd compared to many of the
4 ones we deal with here at the Commission.

5 And I was advised at the last prehearing by
6 Ms. Doberneck that she is the primary attorney, and also
7 the primary policy witness for Covad, and that she
8 requested the ability to provide testimony in this
9 hearing. And I deferred the ruling on that.

10 WorldCom also notified the Commission and the
11 other parties that their attorney, Mr. Dixon, also
12 sought the opportunity to provide testimony. In the
13 event that that's not allowed, he's suggested Ms. Hines
14 could provide testimony.

15 So I guess one question I had, and I don't know
16 if you can speak to this, Mr. Harlow, because
17 Ms. Doberneck is not here, how Covad's -- or how
18 Ms. Doberneck plans to proceed. I know that AT&T has
19 offered to act as counsel on change management issues,
20 but not as to performance issues. At least that's how
21 it appeared on the information provided to the
22 Commission.

23 MR. HARLOW: Well, in terms of an examination,
24 if you will? Is that what you had in mind?

25 JUDGE RENDAHL: Right.

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1 MR. HARLOW: The workshop format really seems
2 to lend itself to narrative type testimony. The direct,
3 if will, would be Covad's comments filed -- Covad
4 Communication Company's comments on the Liberty Data
5 Reconciliation Reports, and Qwest Performance Data filed
6 earlier this month -- or late last month.

7 JUDGE RENDAHL: This won't be a workshop per
8 se. The Commissioners will be sitting in the hearing.
9 And at least for performance and change management, it
10 looks like we're having more of a formal process than we
11 have for the workshops.

12 MR. HARLOW: I haven't been down here for about
13 a year, Your Honor.

14 JUDGE RENDAHL: That's okay. And I realize you
15 are at a disadvantage with Ms. Doberneck not being
16 available.

17 MS. FRIESEN: Ms. Rendahl, Letty Friesen for
18 AT&T. I think I may be able to help you. I have spoken
19 with Ms. Doberneck, and also with Michel Singer Nelson
20 and Tom Dixon in an effort to try to figure out a way to
21 delineate roles for example, in the CMP process --

22 JUDGE RENDAHL: In the what?

23 MS. FRIESEN: Change management process, "CMP",
24 is what we call it.

25 And the way the arguments, the oral arguments

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1 in other jurisdictions have gone is something like this.
2 Judy Schultz for Qwest will make kind of a witness
3 presentation. And then Andy Crain will follow up with
4 the attorneys, kind of an oral argument presentation.

5 And so we had hoped to do sort of a similar
6 thing with respect to change management; that being that
7 Michel and I would serve as the lawyers, and then our
8 lawyer witnesses are the ones who have actually been
9 attending the CMP redesign meetings. And they would
10 prepare and offer some witness type statements. That
11 way we can delineate the roles within the change
12 management, at least the change management discussions,
13 such that you would have a clear picture of who was
14 doing what.

15 JUDGE RENDAHL: Ms. Anderl, is that something
16 that Qwest is willing to live with for change
17 management?

18 MS. ANDERL: Mr. Crain is not available to be
19 here, and he will be the lead attorney. Perhaps
20 Mr. Steese has insight on that?

21 MR. STEESE: I don't think we would have any
22 objection to proceeding in a way that would allow
23 Mr. Dixon to testify as a witness on CPM and allowing
24 Ms. Friesen, and whatever other lawyer she identified --
25 I forgot -- as witnesses in the case.

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1 MS. FRIESEN: Just for clarification --

2 COURT REPORTER: Who is talking, please?

3 JUDGE RENDAHL: Excuse me. Is this

4 Ms. Friesen?

5 MS. FRIESEN: This is Ms. Friesen.

6 JUDGE RENDAHL: Because Ms. Cook is not as
7 familiar with all of your voices, if you could identify
8 yourself on the bridge line before you speak, that would
9 be helpful.

10 Sorry to cut you off.

11 MS. FRIESEN: As I was saying, the witnesses
12 for the change management process would be the attorneys
13 that have actually attended. That would be Megan
14 Doberneck, Tom Dixon and Mitch Menezes for AT&T, and
15 Michel Singer Nelson and myself would act as the
16 lawyers.

17 MR. STEESE: And we would have no objection to
18 that since their role would be focused on being
19 witnesses on that aspect of the proceeding.

20 MS. FRIESEN: And we will certainly make them
21 available for cross examination, and questions from the
22 Commission.

23 JUDGE RENDAHL: Thank you. And I guess that
24 leaves us with the issue of performance where it doesn't
25 appear there's the same type of arrangement with AT&T.

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1 And I guess my concern with the performance is how we
2 proceed with Ms. Doberneck as a witness.

3 I mean, this proceeding is a little odd in the
4 same way that with change management the attorneys have
5 been intricately involved with the process and the
6 policy issues. The same goes for performance issues.

7 But I am just trying to get a sense of how this
8 will flow. And if there's a need for Ms. Doberneck --
9 if someone is cross examining her on performance who is
10 there to defend her? And that's my primary concern.

11 MS. TRIBBY: This is Mary Tribby, Your Honor.
12 Similar to what Ms. Friesen was talking about, the way
13 this has worked in other states on performance issues,
14 Qwest and AT&T both have a witness. They have
15 Mr. Finnigan and Mr. Williams.

16 Ms. Doberneck has typically acted on Covad's
17 behalf because she's been the one most intimately
18 involved with the data reconciliation process, so she
19 has provided at least opening statement type testimony.

20 And I think that's what we had contemplated
21 doing here as well when we talked last time is that the
22 witnesses, Mr. Finnigan and Mr. Williams -- and
23 Mr. Steese, in fact, in the past has done an opening
24 presentation as well -- have provided a summary of their
25 testimony, and/or a legal arguments about the status of

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1 performance.

2 And I think Ms. Doberneck, at least in my
3 experience, sort of goes between those two. She offers
4 some factual testimony, and some legal argument.

5 Now, as to who defends her, I can't help you
6 with that piece of it. But I do think it would be
7 unfortunate, given Megan's involvement in this process
8 up until now, to not hear from Covad simply because they
9 don't have a nonlawyer witness available.

10 JUDGE RENDAHL: I understand. Does Qwest have
11 a position on this issue?

12 MR. STEESE: Ms. Anderl, would you like me to
13 take this piece?

14 MS. ANDERL: Correct.

15 MR. STEESE: Ms. Tribby is correct. I don't
16 want to suggest anything to the contrary. That has
17 occurred in one state. It occurred in the state of
18 Colorado. Covad has testified in one other proceeding,
19 that being Arizona, and there they actually had a
20 witness much like Mr. Williams and Mr. Finnigan to
21 testify to issues like this.

22 However, defendant is troubled by this, because
23 in the state of Colorado it appeared as though
24 Ms. Doberneck, frankly, had a difficult time splitting
25 the roles of lawyer and witness. And it's hard to do,

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1 frankly. I am not being critical. It's a difficult
2 task to perform.

3 And to the extent that she wants to make legal
4 arguments, we would have no objection to that. To the
5 extent she's testifying as a fact witness, my experience
6 is that it's pretty difficult to parse that, and to
7 understand where her role as an advocate stops and
8 starts, and where her role as a fact witness stops and
9 starts.

10 And it's something that Qwest does object to in
11 terms of her being a fact witness and, quote,
12 "advocate." I think that a role needs to be selected.

13 JUDGE RENDAHL: Okay. I am just wondering
14 whether any other parties -- and I am thinking AT&T is
15 prepared to step forward to operate as the defender.

16 I mean, I don't want to -- Covad has, it
17 appears to me, participated in a very detailed way in
18 this process. And I think it would be prejudicial to
19 Covad to prevent them from participating as fully as
20 possible.

21 On the other hand, I am -- as I stated, I am
22 concerned about what Mr. Steese just stated; this
23 conflict between the advocate and the fact witness, and
24 who is there to defend Ms. Doberneck?

25 MR. HARLOW: Your Honor, if I may, since I

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1 haven't been at any of these hearings -- in fact maybe
2 we haven't had any hearings in this docket of this
3 nature. I don't know.

4 But is there a time for fact testimony, and
5 then a time for argument such that there can be a
6 delineation between the two roles that Ms. Doberneck
7 would take? And if not, could we think about setting it
8 up that way?

9 JUDGE RENDAHL: My question is, even if we do
10 that, who is there to object to cross -- yes.

11 MR. HARLOW: -- to object to cross?

12 Well, I suppose she could wear two hats, or
13 potentially we would have to find somebody to do that.

14 JUDGE RENDAHL: My concern is that you need to
15 find someone to do that for her own sake, as well as
16 for -- just to --

17 MR. HARLOW: Something we probably ought to
18 take up off line. If that resolves the objection,
19 simply finding somebody to object and defend her on
20 cross examination, then I think we can work that out.

21 JUDGE RENDAHL: It may not fully satisfy
22 Qwest's concerns. But given that this -- and I will let
23 Mr. Steese speak to that -- but my feeling is that this
24 proceeding is such an odd animal, and we're not
25 operating strictly under any one set of procedures. I

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1 mean, this is not -- this is not a death penalty case
2 where I have serious concerns about attorneys operating
3 as a witness. But this is a little different animal.

4 But Mr. Steese, go ahead.

5 MR. STEESE: And Judge, I am not trying to
6 unduly hamper Covad. I realize Ms. Doberneck has had an
7 interesting role. And, frankly, I have had a similar
8 role, but I am not going to be acting as a witness.

9 The point that I am trying to make is when you
10 are acting as both a witness and lawyer, even in terms
11 of when you are cross examining someone else, it's
12 difficult to parse that out. And as long as the
13 Commission is prepared to have some objections from
14 Qwest when it appears to be getting over the line of
15 cross examination to advocacy, then certainly that would
16 be fine.

17 But really we do think that there needs to be a
18 very clear and defined role. And, frankly, my concern
19 isn't just when Ms. Doberneck is -- like I am saying, I
20 think fairly plainly, isn't just when she's testifying,
21 but also when she's cross examining, because it's a
22 tough line to adhere to.

23 MS. TRIBBY: Your Honor, this is Mary Tribby
24 for AT&T. As to Mr. Harlow's point about delineating, I
25 think the way this has gone in the past is Mr. Steese

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1 gives an opening statement, and then his witness,
2 Mr. Williams, has given a summary of his testimony. So
3 I think Megan could do both of those and delineate when
4 she's doing each. So I think we can take care of that.

5 I mean, Megan is not on the phone to comment on
6 this. I certainly, and I assume lawyers for other
7 parties, would be happy to play the role of lawyer. I
8 don't know if that's something that Qwest would object
9 to or not.

10 But certainly if she was being cross examined,
11 I think one of us in the hearing room that's on the CLEC
12 side could play the role of lawyer for Ms. Doberneck for
13 the hearing, if that would be acceptable.

14 JUDGE RENDAHL: Mr. Steese?

15 MR. STEESE: Frankly, my concern is more -- I
16 mean, I understand Your Honor's intention to protect
17 Ms. Doberneck. That is not my principal concern.

18 JUDGE RENDAHL: I understand that.

19 MR. STEESE: My concern is more the difficulty
20 of playing witness and advocate in the same proceeding,
21 which really is more a function of cross examining
22 Mr. Stright. And, for example, when you are giving an
23 opening statement, and then saying I am a lawyer here
24 and a witness here, that just is confusing.

25 JUDGE RENDAHL: Well, there are reasons for the

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1 ethical rules on this issue.

2 MR. STEESE: So, I mean, to the extent that
3 there is an opening statement and then factual
4 presentation, I am troubled by that. I mean,
5 Ms. Doberneck should have one role in her presentation,
6 if you will.

7 Ms. Tribby is more than capable, as I know you
8 know, of presenting things in kind of an opening
9 statement format. And to take one hat on and put it
10 off, take one hat off and put it on is something that
11 shouldn't happen in "I am giving an opening. Now I am
12 giving my comments."

13 In terms of cross examining Mr. Stright,
14 we would, because Covad's interests are slightly
15 different, ascede to her performing that cross
16 examination so long as the Commission understands that
17 Mr. Anderl or I will be standing up and objecting on
18 occasion if it seems as though the line is getting
19 muddy.

20 JUDGE RENDAHL: I guess what I would like to do
21 is we're going to next, very soon, step into the issue
22 of scheduling, and how we're going to make this
23 proceeding happen. And so when we take our morning
24 break, which will be about 10:30 or 10:45, I would like,
25 to the extent the parties can -- that includes Qwest --

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1 talk about ways to make this work, because I really do
2 think it needs to work.

3 Covad needs to be able to provide its
4 representation and its information in this proceeding.

5 And I think you all have made some strides while we have
6 been talking about it here. But if you could work on it
7 at the break, or even after this prehearing, that would
8 be helpful.

9 The next issue, preliminary issue, and I want
10 to do this very quickly, is Qwest filed a petition on
11 Monday reconsidering the Commission's 30th supplemental
12 order on the performance assurance plan, or what is
13 known as the QPAP, Q-P-A-P.

14 And parties have been inquiring about whether
15 there will be a call for responses. And Ms. Anderl sent
16 in a letter requesting an extension of the time to file
17 compliance information on the 30th supplemental order.

18 And let's be off the record for a moment when
19 we talk about this.

20 (Discussion off the record.)

21 JUDGE RENDAHL: Let's be back on the record.

22 While we were off the record the parties
23 indicated that responses to the QPAP petition for
24 reconsideration could be filed by May 1. And I have
25 asked Qwest to confer about when it needs to have an

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1 order from the Commission in order to provide a
2 compliance filing by May 24th. And Ms. Anderl has said
3 she'll get back to us at the break, so we will take this
4 up at the end. Once we resolve this, I will send a
5 notice out to all parties, and you can have the dates so
6 you can put them into your schedules.

7 In terms of the next issue we need to talk
8 about is scheduling of the hearing. And that would be
9 what topics we take up on which days, which witnesses
10 can be here which days, and estimates of the length of
11 cross. And I think it's best to go off the record again
12 for that discussion.

13 So we will be off the record again.

14 (Brief recess taken.)

15 JUDGE RENDAHL: While we were off the record we
16 talked about the scheduling for the week. Monday and
17 Tuesday we will discuss performance issues. Wednesday
18 is an open meeting, so we will begin on Wednesday at
19 1:30 with compliance issues, finish compliance issues on
20 Thursday morning, and begin change management or CMP
21 issues at 1:30 Thursday, and finish on Friday afternoon.

22 And it looks like the only time we're
23 potentially going over is on Thursday afternoon -- I'm
24 sorry, Tuesday evening.

25 The witnesses we have for performance are

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1 Mr. Williams for Qwest, Mr. Stright, S-t-r-i-g-h-t, for
2 Liberty Consulting, Mr. Finnigan for AT&T, potentially
3 Mr. Kail, K-a-i-l, for AT&T, and Ms. Doberneck,
4 D-o-b-e-r-n-e-c-k, for Covad.

5 While we were on the break, Ms. Doberneck was
6 available, and Mr. Harlow summarized the agreement on
7 Ms. Doberneck's participation on performance issues.
8 And that is that Ms. Doberneck may testify on
9 performance issues. She will not be making an opening
10 statement as an attorney. Covad will be making
11 arrangements to have Ms. Doberneck defended while she's
12 operating as a witness. Ms. Doberneck may cross examine
13 witnesses while operating as an attorney on performance
14 issues, but Qwest reserves the right to object if
15 Ms. Doberneck appears to be crossing over the line one
16 way or the other.

17 Any objections to my recitations?

18 MR. HARLOW: That sounds like what we
19 discussed, Your Honor.

20 JUDGE RENDAHL: The time estimates that the
21 parties gave were, I believe, 10 minutes for each -- 10
22 minutes for Qwest, AT&T, and WorldCom for opening
23 statements on performance. Is that correct?

24 MR. STEESE: Can you say that one more time? I
25 am sorry, Judge.

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1 JUDGE RENDAHL: Starting at 9:30, 10 minutes
2 for Qwest, 10 minutes for AT&T, and 10 minutes for
3 WorldCom providing opening statements on performance
4 issues. Is that correct?

5 MR. STEESE: I thought that -- that is why I
6 asked. I thought that AT&T and WorldCom both thought
7 they could do it in 10 minutes collectively.

8 JUDGE RENDAHL: That's fine, if that's the
9 case. That's why I am asking.

10 MS. SINGER NELSON: I think that's the case,
11 Judge. I think we were planning on doing replies, if
12 necessary, and it would be a total of 10 minutes.

13 JUDGE RENDAHL: Is this Ms. Friesen?

14 MS. SINGER NELSON: No, it's Michel Singer
15 Nelson. I apologize.

16 JUDGE RENDAHL: So 10 minutes for Qwest, and
17 then five apiece for AT&T and WorldCom.

18 MS. SINGER NELSON: Or 10 together.

19 JUDGE RENDAHL: Then we will move -- I think
20 it's best to move directly into Mr. Stright's material.
21 Although that is not probably what you all anticipated,
22 I think that's probably the best way to handle it.

23 Mr. Stright, we have an estimate of 10 minutes
24 for him to give a summary. Qwest has estimated two
25 hours to cross examine. AT&T has estimated an hour to

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1 an hour and a half. WorldCom has estimated 20 to 30
2 minutes. And Covad has estimated 30 minutes of cross.

3 And then there will be Commissioner questions
4 and redirect, and that may take us through the day if
5 we're going to end on time on Monday.

6 MR. STEESE: Your Honor, if I could interject,
7 there may be one way to shorten the time. And I
8 mentioned it last time, and you asked that I raise it
9 here.

10 To the extent that Your Honor is troubled by my
11 two-hour estimate, if I go last in line I will be
12 crossing him, if I go first, based on what I think will
13 be raised. If I go last, I think I will be able to be
14 shorter.

15 JUDGE RENDAHL: That's fine. Does any party
16 object to that?

17 MS. TRIBBY: Your Honor, I would assume -- this
18 is Mary Tribby -- if that's the case, there would be no
19 redirect. I don't know if Mr. Stright is appearing on
20 his own behalf or Qwest's behalf, but since he is an
21 independent consultant, I would not presume that there
22 would be redirect by any party, since he's not actually
23 any party's witness.

24 JUDGE RENDAHL: Mr. Steese?

25 MR. STEESE: Certainly he's not our witness.

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1 We would have no redirect. The only thing I would say
2 in response to that is while he is not, quote, our
3 witness, closed quote, he is a fact witness without
4 question. And certainly Qwest, and I assume the CLEC,
5 would reserve the right to call him as a rebuttal
6 witness if necessary. I don't anticipate that, but I
7 want to raise the specter of that just in case.

8 JUDGE RENDAHL: All right. We will put Qwest
9 last. Does that modify your two hours?

10 MR. STEESE: I think if that's the case, I
11 should be able to finish in an hour and a half, and that
12 will give me more time to cut out areas that are not
13 necessary in light of what the other parties have done.

14 JUDGE RENDAHL: Okay. We will do that. And
15 then Mr. Finnigan has estimated a 45-minute summary.
16 Qwest has estimated cross examination of an hour.
17 Ms. Doberneck has estimated 30 to 45 minutes for a
18 summary, and Qwest has estimated cross of an hour.

19 Again, I will work these into an agenda to let
20 you know where we're running over. My assumption is we
21 will be running over Tuesday afternoon. If not, I will
22 let you know and you all may have to pare down.

23 Wednesday afternoon, Thursday morning we're
24 doing compliance. As we discussed off the record,
25 Ms. Strain will be providing the parties a matrix that

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1 includes -- that Qwest began, and she'll add on the
2 other parties' comments to allow the parties to develop
3 an agenda of which issues we need to discuss. And then
4 we will talk about how much time each of those issues
5 will have during the hearing next week.

6 On Thursday afternoon, beginning at 1:30,
7 we will begin with Ms. Schultz and change management.
8 Qwest, AT&T, and WorldCom have requested 15 minutes each
9 of oral argument, or opening statement overview. And
10 then Ms. Schultz has an hour of a summary presentation.
11 At this point we're assuming she will be adopting
12 Mr. Thompson's and Mr. Hubbard's affidavits, if they are
13 to be included at all in the exhibit list.

14 AT&T has estimated cross of 30 minutes, and
15 WorldCom has estimated cross of 30 minutes. And then we
16 have a panel of witnesses for the CLEC, AT&T, Covad, and
17 WorldCom. Mr. Menezes will make a 45-minute
18 presentation. Ms. Doberneck will make a 30-minute
19 presentation, and Mr. Dixon will make a 45-minute
20 presentation. And Qwest has estimated two hours of
21 cross or redirect time, based upon their panel. Menezes
22 is M-e-n-e-z-e-s. And that should allow us to conclude
23 on time on Friday.

24 Are there any comments based on what I just
25 summarized into the record?

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1 (No response.)

2 JUDGE RENDAHL: Let's go to the exhibit
3 listing, and we're off the record.

4

5 (The following Exhibits were identified in
6 conjunction with Performance Data and Data
7 Reconciliation.)

8 Exhibit 1310 is Comments of Michael G. Williams
9 on Behalf of Qwest Corporation re: Performance, 11-7-01.
10 Exhibit 1311 is Qualifications of Michael G. Williams.
11 Exhibit 1312 is 10-16-01 Memo to Megan Doberneck, Covad,
12 from Bob Stright, Liberty Consulting Group. Exhibit
13 1313-C is Confidential Portion of Comments,
14 (CONFIDENTIAL). Exhibit 1314 is Direct Testimony of
15 Michael G. Williams on Behalf of Qwest Corporation re:
16 Performance Data, 11-16-01. Exhibit 1315 is Summary of
17 Qwest's 271 Performance Results (MGW-2). Exhibit 1316
18 is Supplemental Direct Testimony of Michael G. Williams
19 on behalf of Qwest Corporation re: Performance Data,
20 12-5-01 (MGW-T3). Exhibit 1317 is September 2001
21 Performance Results (MGW-T3). Exhibit 1318 is Qwest
22 Performance Results (ROC 271 PID 4.0) (MGW-5). Exhibit
23 1319 is Supplemental Direct Testimony of Michael G.
24 Williams on Behalf of Qwest Corporation re: February
25 2001 - January 2002 Performance Data, dated March 8,

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1 2002 (Exhibit MGW-T6). Exhibit 1320 is Qwest's
2 Performance Results, Washington, February 2001 - January
3 2002, dated February 20, 2002 (Exhibit 1). Exhibit 1321
4 is Qwest's Performance Results, Regional, February 2001
5 - January 2002, dated February 20, 2002 (Exhibit 2).
6 Exhibit 1322 is PID Correlation Table, (February 2001 -
7 January 2002 Performance Report) (Exhibit 3.) Exhibit
8 1323 is Summary Notes on the Qwest Regional Performance
9 Results Report, dated March 11, 2002 (Exhibit 4).
10 Exhibit 1324 is Summary of Qwest's 271 Performance
11 Results, Washington (Blue Chart) (Exhibit 5). Exhibit
12 1325 is Summary of Qwest's 271 Performance Results,
13 Regional (Blue Chart), (Exhibit 6). Exhibit 1326 is
14 Liberty Data Reconciliation Report for Arizona (Exhibit
15 7). Exhibit 1327 is Liberty Data Reconciliation Report
16 for Colorado (Exhibit 8). Exhibit 1328 is Liberty Data
17 Reconciliation Report for Nebraska (Exhibit 9). Exhibit
18 1329 is Supplemental Liberty Data Reconciliation Report
19 for Colorado (Exhibit 10). Exhibit 1330 is Liberty Data
20 Reconciliation Report for Washington (Exhibit 11).
21 Exhibit 1331 is Summary of Problems Incurred in
22 Provisioning Process Associated with analog Loop
23 Installation in October 2001 (Exhibit 12). Exhibit 1332
24 is Matrix of Missed PIDS for Multiple Months Based on
25 February 2001 - January 2002 Data Report (Exhibit 13).

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1 Exhibit 1333 is Matrix of Missed PIDS, October 2001,
2 Based on February 2001 - January 2002 Data Report
3 (Exhibit 14). Exhibit 1334 is Matrix of Missed PIDS,
4 November 2001, Based on February 2001 - January 2002
5 Data Report (Exhibit 15). Exhibit 1335 Matrix of Missed
6 PIDS, December 2001, Based on February 2001 - January
7 2002 Data Report (Exhibit 16). Exhibit 1336 is Matrix of
8 Missed PIDS, January 2002, Based on February 2001-
9 January 2002 Data Report (Exhibit 17). Exhibit 1337 is
10 Supplemental Direct Testimony of Michael G. Williams on
11 Behalf of Qwest Corporation re: March 2001 - February
12 2002 Performance Data, dated April 5, 2002 (Exhibit
13 MGW-T7). Exhibit 1338 is Qwest's Performance Results,
14 Washington, March 2001 - February 2002, dated March 30,
15 2002 (Exhibit 1). Exhibit 1339 is Qwest's Performance
16 Results, Regional, March 2001 - February 2002, dated
17 March 30, 2002 (Exhibit 2). Exhibit 1340 is PID
18 Correlation Table (March 2001 - February 2002) (Exhibit
19 3). Exhibit 1341 is Summary of Notes on the Qwest
20 Regional Performance Results Report, dated April 4, 2002
21 (Exhibit 4). Exhibit 1342 is Summary of Qwest's 271
22 Performance Results, Washington (February Blue Chart)
23 (Exhibit 5). Exhibit 1343 is Summary of Qwest's 271
24 Performance Results, Regional (February Blue Chart)
25 (Exhibit 6). Exhibit 1344 is Liberty Data Reconciliation

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1 Report for Oregon (Exhibit 7). Exhibit 1345 is Matrix
2 of Missed PIDs for Multiple Months Based on March 2001 -
3 February 2002 Data Report (Exhibit 8). Exhibit 1346 is
4 Matrix of Missed PIDS, November 2001, Based on March
5 2001 - February 2002 Data Report (Exhibit 9). Exhibit
6 1347 is Matrix of Missed PIDS, December 2001, Based on
7 March 2001 - February 2002 Data Report (Exhibit 10).
8 Exhibit 1348 is Matrix of Missed PIDS, January 2002,
9 Based on March 2001 - February 2002 Data Report (Exhibit
10 11). Exhibit 1349 is Matrix of Missed PIDS, February
11 2002, Based on March 2001 - February 2002 Data Report
12 (Exhibit 12). Exhibit 1350 is Qwest's Response to
13 Observation 3089 (Exhibit 13). Exhibit 1351 is Cap
14 Gemini Ernst and Young Report on Arizona "Incident Work
15 Order" Equivalent of Observation 3089 (Exhibit 14).
16 Exhibit 1352 is October 2001 Covad Comments on the
17 Liberty Performance Measurement Audit Report (Exhibit
18 15). Exhibit 1353 is Liberty's Response to Covad's
19 October Comments on the Liberty Performance Measurement
20 Audit Report (Exhibit 16). Exhibit 1354 is CLEC
21 Electronic Flow-Through Rates (Exhibit 17). Exhibit 1355
22 is Qwest's Performance Results, Washington, April 2001 -
23 March 2002, dated April 16, 2002, (if available).
24 Exhibit 1356 is Qwest's Performance Results, Regional,
25 April 2001 - March 2002, dated April 16, 2002 (if

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1 available). Exhibit 1357 is Understanding Qwest's 271
2 Statistical Reports. Exhibit 1358 is PID Version 3.0.
3 Exhibit 1359 is PID Version 4.0. Exhibit 1360 is
4 Observation 3099, Qwest's Responses thereto, and KPMG's
5 Reaction Thereto. Exhibit 1361 is Exception 3120 and
6 Qwest's Response Thereto. Exhibit 1362 is Qwest's
7 Response to Data Request ETX 01-001S1 (Joint CLEC Cross
8 Exhibit). Exhibit 1363 is Qwest's Response to Data
9 Request ETX 01-003S1 (Joint CLEC Cross Exhibit). Exhibit
10 1364 is Qwest's Response to Data Request ETX 01-004S1
11 (Joint CLEC Cross Exhibit). Exhibit 1370 is Direct
12 Testimony of Robert L. Stright, Liberty Consulting
13 Group, re: October 2001 - January 2002 Performance Data,
14 March 13, 2002. Exhibit 1371 is Qualifications of Robert
15 L. Stright (Exhibit RLS-2). Exhibit 1391 is Affidavit
16 of Stephen L. Kail on Behalf of AT&T Regarding Analysis
17 of Qwest Performance Data (Public Version), 12-5-01,
18 with verification dated 12-10-01 (SLK-T1). 1392-C,
19 Affidavit of Stephen L. Kail on Behalf of AT&T Regarding
20 Analysis of Qwest Performance Data (Proprietary
21 Version), 12-5-01 (SLK-TC1) (CONFIDENTIAL). Exhibit 1393
22 is ROC 271 PID PO-5 (Versions 3.0 and 4.0) (SLK-2).
23 Exhibit 1394-C is WA LIS PO-5 FOCS On Time (SLK-3C)
24 (CONFIDENTIAL). Exhibit 1395 is ROC 271 PID OP-3
25 (Versions 3.0 and 4.0) (SLK-4). Exhibit 1396-C is WA LIS

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1 OP-3 Installation Commitments Met (SLK-5C)
2 (CONFIDENTIAL). Exhibit 1397 is ROC 271 PID OP-4
3 (versions 3.0 and 4.0) (SLK-6). Exhibit 1398-C is WA
4 LIS OP-4 Installation Interval (SLK-7C) (CONFIDENTIAL).
5 Exhibit 1399 is ROC 271 PID OP-6 (versions 3.0 and 4.0)
6 (SLK-8). Exhibit 1400-C is WA LIS OP-6A-4&5 Average
7 Delay Beyond Due Date - Non Facility Reasons and
8 OP-6B-4&5 Average Delay Beyond Due Date for Facility
9 Reasons (SLK-9C) (CONFIDENTIAL). Exhibit 1401 is ROC 271
10 PID OP-15 (versions 3.0 and 4.0) (SLK-10). Exhibit
11 1402-C is WA LIS OP-15A EOM Pending Orders Delayed Past
12 Due Date and OP-15B EOM Pending Orders: Facility Delays
13 (SLK-11C) (CONFIDENTIAL). Exhibit 1403-C is WA
14 UBL-Analog OP-3D Installation Commitments Met (Table)
15 (SLK-12C) (CONFIDENTIAL). Exhibit 1404-C is WA
16 UBL-Analog OP-4D Installation Interval (Table) (SLK-13C)
17 (CONFIDENTIAL). Exhibit 1405-C is WA UBL-Analog OP-6A-4
18 Average Delay Beyond Due Date - Non Facility Reason and
19 OP-6B-4 Average Delay Beyond Due Date - Facility Reasons
20 (charts) (SLK-14C) (CONFIDENTIAL). Exhibit 1406 is ROC
21 271 PID OP-13 (versions 3.0 and 4.0) (SLK-15). Exhibit
22 1407-C is WA UBL-Analog OP-13A (chart) (SLK-16C)
23 (CONFIDENTIAL). Exhibit 1420 is Affidavit of John F.
24 Finnegan on Behalf of AT&T Regarding Analysis of Qwest
25 Performance Data, 12-12-01, (JFF-1T), with verification

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1 10-31-01. Exhibit 1421 is Supplemental Affidavit of John
2 F. Finnegan on Behalf of AT&T Regarding Analysis of
3 Qwest Performance Data, 12-5-01 (JFF-2T), with
4 verification. Exhibit 1422 is AT&T's Verified Comments
5 Regarding Qwest's Performance Data, 3-22-02. Exhibit
6 1423 is Ex. A - AT&T's Comments on the Liberty Data
7 Reconciliation Report, Washington, 3-22-02. Exhibit
8 1424 is Ex. B - AT&T's Comments on Liberty Consulting
9 Group's Report on Qwest Performance Measure Data
10 Reconciliation for Arizona, 12-10-01. Exhibit 1425 is
11 Ex. C - AT&T's Brief on Liberty Data Reconciliation
12 Report, Arizona, 1-18-02. Exhibit 1426 is Exhibit D. -
13 At&T's Comments on Second Report on Qwest Performance
14 Measure Data Reconciliation - Colorado, 1-3-02. Exhibit
15 1427 is Ex. E - AT&T's comments on Data Reconciliation
16 Update - Colorado, 2-2-02. Exhibit 1428 is Ex. F -
17 AT&T'S comments on Third Report on Qwest Performance
18 Measure Data Reconciliation - Nebraska, 1-27-02.
19 Exhibit 1429 is AT&T's Revisions to Qwest's Blue Charts,
20 4-16-02. Exhibit 1440 is Covad Communications Company's
21 Comments On The Liberty Data Reconciliation Report And
22 Qwest's Performance Data, 3-21-02. Exhibit 1441 and 1442
23 is Ex. 1 Covad's Redlined Comments on the Liberty Data
24 Reconciliation Report for Arizona Ex. 2. Exhibit 1443 is
25 Ex. 3 Liberty Data Reconciliation Report for Colorado.

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1 Exhibit 1444 is Ex. 4 Excerpts from the Second Technical
2 Conference before the Colorado Public Utilities
3 Commission, Docket No. 97I-198T. Exhibit 1445 is Ex. 5
4 Covad's Redlined Comments on the Liberty Data
5 Reconciliation Report for Washington. Exhibit 1446 is
6 Ex. 6 Liberty Data Reconciliation Report for Nebraska.
7 Exhibit 1447 is Ex. 7 Liberty Data Reconciliation Report
8 for Colorado - Update. Exhibit 1448-C is Ex. 8
9 CONFIDENTIAL EXCERPTS from Covad-specific PID reports
10 for Nebraska, North Dakota and South Dakota. Exhibit
11 1449-C is Ex. 9 CONFIDENTIAL EXCERPTS from
12 Covad-specific PID Report for Washington. Exhibit
13 1450-C is Ex. 10 CONFIDENTIAL Covad Data for OP-4 loop
14 count/denominator. Exhibit 1451 is Ex. 11 Excerpt from
15 Aggregated PID Report for Washington, February 2001 -
16 January 2002. Exhibit 1452 is Ex. 12 E-mail from
17 Michael Williams to ROC TAG (and attachment), dated
18 October 23, 2001. Exhibit 1453 is Ex. 13 e-mail from
19 Michael Williams to ROC TAG (and attachment), dated
20 November 7, 2001. Exhibit 1454-C is CONFIDENTIAL
21 Covad-specific Order Evaluation by Liberty for Data
22 Reconciliation, filed 4-16-02 (KMD-14). Exhibit 1455 is
23 Comments of Covad Communications Company on Qwest's
24 September 7, 2001 Performance Data Filing, 10-11-01.
25 Exhibit 1456 is Covad Communication Company's Submission

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1 of Data Regarding Qwest's Commercial Performance in the
2 State of Washington, 12-3-01. Exhibit 1457-C is Covad
3 Communication Company's Submission of Data Regarding
4 Qwest's Commercial Performance in the State of
5 Washington, 12-4-01 (Proprietary Version)
6 (CONFIDENTIAL). Exhibit 1458 is Ex. 2 - Excerpts from
7 Qwest's Aggregated PID Report (October 2000 - September
8 2001). Exhibit 1459-C is Ex. 3 - Excerpt from
9 Covad-specific PID Report (Sept. 2000 - August 2001)
10 (CONFIDENTIAL). Exhibit 1460-C is Ex. 4 - PO-5, MR-3,
11 and MR-6 performance results (CONFIDENTIAL). Exhibit
12 1461 is Ex. 6 - Washington Data Reconciliation, Covad
13 Comments on Qwest Provided Data. Exhibit 1462-C is Ex.
14 6C - Washington Data Reconciliation, Covad Comments on
15 Qwest Provided Data - Confidential Version
16 (CONFIDENTIAL). Exhibit 1463-C is Ex. 7 - OP-5 Metric
17 (CONFIDENTIAL). Exhibit 1464-C is Ex. 8 - Data Request
18 Arizona (Qwest) (CONFIDENTIAL). Exhibit 1465 is PID
19 PO-5 Definition and Description. Exhibit 1466 is
20 Excerpts from Qwest's Standard Interval Guide. Exhibit
21 1467 is Colorado xDSL FOC Trial Description.

22 (The following exhibits were identified in
23 conjunction with Qwest:)

24 Exhibit A is Liberty's Observations (1026-1038)
25 and Exception (1046) Issued During the Court of the Data

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1 Reconciliation. Exhibit B is Qwest's Responses (and
2 when submitted, any supplemental responses) to Liberty's
3 Observations and Exception. Exhibit C is AT&T's
4 Responses to Liberty's Observations and Exception.
5 Exhibit D is Liberty's Requests for Clarification of
6 Observations 1028, 1029, and 1030. Exhibit E is
7 Liberty's Closure of Observations (1028-1030 and
8 1032-1038) and Exception (1046) (If Observation 1031
9 closes before or during the April Hearing, Qwest will
10 utilize that document as well.) Exhibit F AT&T's
11 Responses to Liberty's Closure of Various Observations.
12 Exhibit G is Liberty's Performance Measurement Audit
13 Reports. Exhibit H is AT&T's comments to Liberty
14 Consulting's Performance Measurement Audit. Exhibit I is
15 Qwest's Comments to Liberty's Arizona Data
16 Reconciliation Report. Exhibit J is Qwest's Arizona
17 Brief Concerning Liberty's Arizona Data Reconciliation
18 Report. Exhibit K is ROC OSS Change Request No. 20.
19 Exhibit L is OSS Evaluation (Observation and Exception
20 Process). Exhibit M is AT&T's and Covad's List of PIDs
21 for Data Reconciliation. Exhibit N is September 18,
22 2001 e-mail from Chuck Steese of Qwest to Megan
23 Doberneck of Covad concerning the Scope of Data
24 Reconciliation. Exhibit O is October 19, 2001 e-mail
25 response from MTG to AT&T concerning Liberty's Work in

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1 the Data Reconciliation. Exhibit P is November 9, 2001
2 e-mail from Chuck Steese re: Excluding 72 hour FOCs from
3 PO-5 during the Time Period of the Data Reconciliation.
4 Exhibit Q is November 13, 2001 e-mail from Chuck Steese
5 re: Reasons Qwest Cannot Reconcile Covad's Maintenance
6 and Repair Performance Data without More Information.
7 Exhibit R is Documents re: Whether Supplemented Orders
8 Should be Included or Excluded from OP-3 and OP-4 in PID
9 version 3.0 including November 28, 2001 e-mail from
10 Chuck Steese to the Data Reconciliation Distribution
11 List and John Finnegan's November 30, 2001 Response
12 Thereto. Exhibit S is Scope of Data Reconciliation after
13 Issuance of the Arizona Report including: December 11,
14 2001 e-mail from Chuck Steese; December 11, 2001 e-mail
15 response from Covad; December 12, 2001 e-mail response
16 by AT&T; and December 12, 2001 Decision by Liberty
17 Consulting. Exhibit T is November 15, 2001 e-mail with
18 AT&T's analysis of Qwest's Arizona Data. Exhibit U is
19 Covad's (undated) Analysis of Qwest's Performance Under
20 OP-3 and OP-4 for Line-Sharing and 2-wire Non-Loaded
21 Loops. Exhibit V is Arizona IW02105, Qwest's Responses
22 Thereto, and Closure of the IWO by CGE&Y. Exhibit W is
23 December 10, 2001 Status Report on Data Reconciliation
24 from Liberty Consulting. Exhibit X is Qwest's Training
25 Materials for Observation 1031 (Portions Confidential).

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1 Exhibit Y is Qwest's Training Materials for Observation
2 1036 (Portions Confidential). Exhibit Z-C is Qwest's
3 Training Materials for Observation 1037 "Confidential".
4 Exhibit AA is Exception 3103 and Qwest's Responses
5 Thereto. Exhibit AB-C is February 12, 2002 e-mail from
6 Brent Levy to Liberty re: AT&T and Qwest Joint Analysis
7 of Orders for the OP Measures in Washington (Portions
8 Confidential). Exhibit AC-C is February 14, 2002 e-mail
9 from Brent Levy to Liberty re: AT&T and Qwest Joint
10 Analysis of Orders for PO-5 in Washington (Portions
11 Confidential). Exhibit AD is February 19, 2002 e-mail
12 from Stephen Kail re: PO-5 Differences between and AT&T.
13 Exhibit AE-C is February 10, 2002 e-mail from Stephen
14 Kail to Dave Wendlandt of Qwest re: Agreement on PO-5
15 between Qwest and AT&T (Portions Confidential). Exhibit
16 AF is March 28, 2002 e-mail from Stephen Kail to Brent
17 Levy re: Qwest's Interpretation of How to Measure the
18 Retermination of Interconnection Trunks in the OP
19 Measures.

20 (The following Exhibits were identified in
21 conjunction with Compliance Issues:)

22 Exhibit 1500 is Qwest's Demonstration of
23 Compliance with Commission Orders as of April 5, 2002
24 with Matrix. Exhibit 1501 is Qwest Corporation's Notice
25 of Updated Statement of Generally Available Terms and

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1 Conditions, April 5, 2002. Exhibit 1502 is Washington
2 SGAT, Fourth Revision, April 5, 2002. Exhibit 1503 is
3 Washington SGAT, Fourth Revision, April 5, 2002,
4 Redlined Version. Exhibit 1504 is Supplemental Report of
5 Qwest Corporation Regarding Section 272, 4-10-02, with
6 Exhibits 1, 2, and 3. Exhibit 1505 is Qwest's Status
7 Report re: Automation of the Subloop Ordering Process,
8 April 11, 2002. Exhibit 1506 is Ex. 1- Subloop PCAT
9 PV6.0. Exhibit 1507 is Qwest's Memorandum Regarding
10 Remote Deployment of DSL, April 10, 2002. Exhibit 1508
11 is Qwest's Response to AT&T Supplemental Filing
12 Regarding Qwest's Compliance with Washington Commission
13 Orders Regarding Workshop 1 and 2 Issues, 2-8-02.
14 Exhibit 1509 Qwest Corporation's Response to AT&T's
15 Motion to Further Modify Qwest's SGAT (Sections) 7.1.2.1
16 and 7.3.2.1.1, 2-25-02. Exhibit 1515 is AT&T's Response
17 to Qwest's Notice of Updated Statement of Generally
18 Available Terms and Conditions, 4-16-02. Exhibit 1516 is
19 Attachment A - SGAT section 9.1.2. Exhibit 1517 is
20 Attachment B - SGAT section 9.19. Exhibit 1518 is
21 Attachment C - Excerpt from June 11, 2001 Third Report -
22 Emerging Service, Liberty Consulting Group. Exhibit 1519
23 is Attachment D - Subloop Ordering. Exhibit 1520 is AT&T
24 Compliance Exhibit re: SGAT sections 7.1.2.1 and
25 7.3.2.1.1. Exhibit 1521 is CLEC Using LIS Entrance

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1 Facilities. Exhibit 1522 is AT&T Supplemental Filing
2 Regarding Qwest's Compliance with Washington Commission
3 Orders Regarding Workshop 1 and 2 Issues, 1-15-02.
4 Exhibit 1523 is AT&T's Reply to Qwest's Response to
5 AT&T's Motion Regarding SGAT (Sections) 7.1.2.1,
6 7.3.2.1.1 & 10.2.2.4, filed 2-21-02. Exhibit 1524 is
7 AT&T's Motion to Further Modify Qwest's SGAT (Sections)
8 7.1.2.1 and 7.3.2.1.1 Because Qwest has failed to Modify
9 it to be Compliant with this Commission's Orders on the
10 Act, filed 2-15-02. Exhibit 1530 is Covad Communications
11 Company's Comments on Qwest's April 5, 2002 Compliance
12 Filing, April 17, 2002. Exhibit 1533 is ELI comments on
13 Qwest Compliance with Commission Orders, April 17, 2002,
14 with attachment.

15 (The following Exhibits were identified in
16 conjunction with Change Management Process:)

17 Exhibit 1535 is Affidavit of Judith M. Schultz
18 Regarding Change Management, submitted March 15, 2002.
19 Exhibit 1536 is Master Redlined CLEC-Qwest CMP Redesign
20 Framework - CLEAN - History Log (Exhibit A). Exhibit
21 1537 is Change Management Process (CMP) Improvements -
22 11-26-01, Revised 2-15-02 (Exhibit B). Exhibit 1538 is
23 Affidavit of Judith M. Schultz in Response to Joint CLEC
24 Brief regarding Qwest's Change Management Process,
25 submitted April 16, 2002. Exhibit 1539 is Ranking of

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1 AT&T Priority Line Items Identified as 1's, April 4,
2 2002 (Exhibit A). Exhibit 1540 is Change Management
3 Improvements, April 15, 2002 (Exhibit B). Exhibit 1541
4 is Qwest Event Notification re: IMA GUI and EDI
5 Notification - Outdated NC/NCI Code Combinations
6 (Exhibit C). Exhibit 1542 is AT&T ROC Observation.
7 Exhibit 1543 is AT&T 4-16 Response to Joint CLEC Brief,
8 Ex. A - EXC 3077 Disp. Rpt. 4-16. Exhibit 1544 is Ex. B
9 - Ex. 3095 Disp. Rpt. 4-16. Exhibit 1545 is Affidavit of
10 Jeffery L. Thompson in Response to Joint CLEC Brief
11 Regarding Qwest's Change Management Process, April 16,
12 2002. Exhibit 1546 is Affidavit of Robert J. Hubbard in
13 Response to Joint CLEC Brief Regarding Qwest's Change
14 Management Process, April 16, 2002 (Public Version).
15 Exhibit 1547-C is Affidavit of Robert J. Hubbard in
16 Response to Joint CLEC Brief Regarding Qwest's Change
17 Management Process, April 16, 2002 (CONFIDENTIAL).
18 Exhibit 1548 is Action Items, COVAD US WEST Operations
19 Meeting, February 25, 2000 (Updated 4-16-02). Exhibit
20 1550 is Qwest Corporation's Report on the Status of
21 Change Management Process Redesign, April 15. Exhibit
22 1551 is Master Redlined CLEC-Qwest CMP Redesign
23 Framework - CLEAN - History Log (Exhibit A). Exhibit
24 1552 is Qwest-CLEC Change Management Process, Concepts
25 Agreed Upon through the April 2-4, 2002 Redesign Session

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1 in Response to AT&T's, Covad's and WCom's Priority Lists
2 (Exhibit B). Exhibit 1553 is Draft meeting Minutes,
3 CLEC - Qwest Change Management Process Redesign, Monday,
4 March 18 and Tuesday, March 19, 2002 Working Session
5 (Exhibit C). Exhibit 1554 is CLEC-Qwest Change
6 Management Process Redesign, Schedule of Working
7 Sessions, Revised April 5, 2002, (Exhibit D). Exhibit
8 1555 is Ranking of AT&T Priority List Items Identified
9 as 1's, April 4, 2002 (Exhibit E, Part 1). Exhibit 1556
10 is Ranking of AT&T Priority List Items Identified as
11 0's, Revised April 4, 2002 (Exhibit E, Part 2). Exhibit
12 1557 is Section 3.4, Qwest Initiated Product/Process
13 Change Process (Exhibit F). Exhibit 1558 is Change
14 Management Improvements, April 15, 2002, (Exhibit G).
15 Exhibit 1565 is AT&T's Comments on Quest's Status Report
16 Regarding the Change Management Process Redesign,
17 10-29-01. Exhibit 1566 is Ex. A - Arizona IWO Formal
18 Response, IWO 1075-1. Exhibit 1567 is Ex. B - Arizona
19 IWO Formal Response, IWO 1076-1. Exhibit 1568 Ex. C -
20 Arizona IWO Formal Response, IWO 1078. Exhibit 1569 is
21 Ex. D - Draft List of Issues Deferred to Change
22 Management Process. Exhibit 1570 is Ex. E - AT&T's
23 Comments relative to a Revised CICMP Process, 7-6-01.
24 Exhibit 1571 is AT&T's Comments on Qwest's Report on the
25 Status of Change Management Process Redesign, 1-22-02.

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1 Exhibit 1572 is Ex. A - Interim Qwest Product/Process
2 Change Management Process, Revised 10-3-01. Exhibit 1573
3 is Ex. B - e-mail Re: IMA 10.0 Prioritization, 10-25-01.
4 Exhibit 1574 is Ex. C - e-mail RE: IMA 10.0
5 Prioritization, 10-29-01. Exhibit 1575 is Ex. D -
6 e-mail RE: Qwest Regulatory Candidates for IMA 10.0,
7 11-16-01. Exhibit 1576 is Ex. E - e-mail RE: IMA 8.01
8 Appointment Scheduler Function, 10-23-01. Exhibit 1577
9 is Ex. F - e-mail RE: IMA Release 8.01 to be available
10 November 19, 2001, 11-2-01. Exhibit 1578 is Ex. G -
11 e-mail RE: Qwest Final CR Responses w/attachments,
12 11-12-01. Exhibit 1579 is Ex. H - e-mail RE: Escalation
13 regarding Qwest's additional testing CR. #PC100101-5,
14 12-5-01. Exhibit 1580 is Ex. I - Qwest Proposed
15 Production Support Language, 12-11-01. Exhibit 1581 is
16 Ex. J - CLEC - Qwest Change Management Redesign Working
17 Sessions Core Team Issues/Action Items Log - OPEN,
18 revised 12-11-01. Exhibit 1582 Ex. K - CMP Redesign
19 Discussion Running List, revised 12-11-01. Exhibit 1583
20 is Ex. L - List of items AT&T would like to clarify or
21 raise for discussion, 11-13-01. Exhibit 1584 is Ex. M -
22 WorldCom (Liz Balvin) Comments on CMP - Checklist to
23 address OSS Interface Issues, 11-13-01. Exhibit 1585 is
24 Ex. N - Memo from AT&T Redesign Members RE: Comments
25 Concerning the Sept 5 and 6 Redesign Meetings, 9-14-01.

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1 Exhibit 1586 is Joint CLEC Brief Regarding Qwest's
2 Change Management Process, 4-8-02. Exhibit 1587 is Ex. A
3 - Ranking of AT&T Priority list Items ("1s") 3-19-02.
4 Exhibit 1588 is Ex. B - Description of Concensus
5 Concepts on the Priority Issues Identified and Discussed
6 in CMP Redesign in the CMP Redesign meetings Held on
7 March 5-7, March 18-19, and April 2-4, 2002. Exhibit
8 1589 is Ex. C and C(a) - Arizona IWO Formal Response.
9 Exhibit 1590 is Ex. D - Master Redlines CLEC-Qwest CMP
10 Redesign Framework Interim Draft. Exhibit 1591-C is Ex.
11 E - Chronology of PLOC Freeze CMP Issues (Attachment
12 1(a) - CONFIDENTIAL). Exhibit 1592 is Ex. F - Excerpts
13 from Qwest Code of Conduct and Retail Wholesale Process
14 - posted 10-15-01. Exhibit 1593 is Ex. G - Affidavit of
15 Sheila Hoffman (substituted). Exhibit 1594 is Ex. H -
16 3.4 Qwest Initiated Product/Process Change Process.
17 Exhibit 1595 is Ex. I - Qwest Event Notification,
18 4-4-02. Exhibit 1596 is Ex. J - Qwest Management Process
19 Issues. Exhibit 1597 is Ex. K - Exception 3094 -
20 Disposition Report, Qwest OSS Evaluation, 4-4-02.
21 Exhibit 1598 is Ex. L - Exception 3110 - Disposition
22 Report, Qwest OSS Evaluation, 4-2-02. Exhibit 1599 is
23 Ex. M - Exception 3111 - Disposition Report, Qwest OSS
24 Evaluation, 4-4-02. Exhibit 1600 is Ex. N - Exception
25 3077 - Third Response, Qwest OSS Evaluation, 4-3-02.

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1 Exhibit 1601 is Ex. 0 - Exception 3095 - Third Response,
2 Qwest OSS Evaluation, 4-2-02. Exhibit 1602 is Colorado
3 Public Utilities Commission Order Setting Status
4 Conference and Vacating Commission Decision meeting,
5 4-15-02. Exhibit 1605 is Covad Communications Company's
6 Comments on Qwest Corporation's Report on the Status of
7 Change Management Redesign, 10-24-01. Exhibit 1606 is
8 Ex. 1 - CLEC-Qwest Change Management Redesign Working
9 Sessions, Core Team Issues/Action Items Log - OPEN,
10 Revised - October 5, 2001. Exhibit 1607 is Covad
11 Communications Company's Comments on Qwest Corporation's
12 December 2001 Report on the Status of Change Management
13 Redesign, 12-10-01. Exhibit 1608 Ex. 1 - 12-5-01 e-mail
14 from F. Lynne Powers to Judith Schultz, re: escalation
15 testing, and other documents. Exhibit 1609 Ex. 2 -
16 12-8-01 e-mail from F. Lynne Powers to Mark Routh re:
17 Event Notifications & Other mailouts, and other
18 documents. Exhibit 1610 is Ex. 3 - 12-7-01 e-mail from
19 F. Lynne Powers to Judith Schultz re: Escalation/Desired
20 CLEC Resolution. Exhibit 1611 is Ex. 4 - 11-28-01 e-mail
21 from Karen L. Clauson to Jim Maher re: Eschelon's
22 comments on Draft November CMP Redesign Status Report.
23 Exhibit 1612 is KMD-15, Draft Meeting Minutes, April 4,
24 Special Retail Party. Exhibit 1613 is KMD-16, 4-12-02
25 e-mail for Karen Clauson to Jim Maher, etc., re: Draft

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1 Meeting Minutes, Special Retail Party.

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3 JUDGE RENDAHL: Let's be on the record.

4 While we were off the record we went through
5 all of the various exhibits that the parties have filed
6 and gave them numbers starting at 1310 and ending in the
7 1600 range. I will make copies of the list with the
8 numbers that I wrote in, and provide them to the court
9 reporter, Ms. Cook, so she can incorporate the list into
10 the record. And I will circulate copies electronically
11 to the parties and have them available in hard copy at
12 the hearing starting on Monday.

13 A couple of issues we needed to talk about, the
14 QPAP request, Performance Assurance Plan. We had talked
15 about having parties respond on May 1 to the petition
16 for reconsideration, and we needed an estimate from
17 Qwest as to when an order -- what is the last date an
18 order needs to come out to allow Qwest to file for --

19 MS. ANDERL: And I said I thought a week, and
20 that turns out to be accurate. We would obviously like
21 10 days, but we can do it in a week.

22 JUDGE RENDAHL: So if an order comes out at the
23 very latest on May 17, that will provide Qwest time --
24 barely time enough to get a compliance filing turned
25 around?

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1 MS. ANDERL: We will do our best, Your Honor,
2 and we will advise you if we have any issues. It
3 obviously makes a difference what the order says.

4 JUDGE RENDAHL: And the last issue is the final
5 final date that we needed to talk about, Ms. Anderl.

6 MS. ANDERL: Yes, Your Honor. We have been
7 advised that the date for issuance of the final final
8 report has been extended. And at this point we have
9 been advised that the date is May 28. We are, however,
10 talking to the tester, KPMG, to see if we can get that
11 date pulled back to the 24th, in which case we could
12 potentially still hold the schedule in Washington. And
13 therefore, we wanted to raise the issue, but not ask
14 that you do anything about it at this time since we will
15 be together probably every day next week. We will
16 probably have some time to talk about it when we know
17 more.

18 JUDGE RENDAHL: I appreciate the update. And
19 to the extent they can get the final out by the 24th,
20 that would give you time to file something the following
21 week and keep us still on schedule. So I appreciate the
22 update.

23 I don't think there's anything else we need to
24 talk about this morning. If there's anything else,
25 please let me know.

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(No response.)

JUDGE RENDAHL: Hearing nothing, I will issue a
brief prehearing conference order based on what we
talked about, and circulate the exhibit list and an
agenda. Thank you very much. I'll see you all on
Monday. We're adjourned and will be off the record.

MR. HARLOW: Thank you, Your Honor.

END TIME: 12:45 P.M.