

IN THE MATTER OF THE INVESTIGATION INTO U S WEST COMMUNICATIONS, INC.,  
COMPLIANCE WITH § 271(C) OF THE TELECOMMUNICATIONS ACT OF 1996

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**AFFIDAVIT OF ROBERT J. HUBBARD IN SUPPORT OF  
QWEST CORPORATION'S COMMENTS  
DEMONSTRATING SATISFACTION OF THE FCC'S  
SECTION 271 CHANGE MANAGEMENT EVALUATION CRITERIA**

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 CLEC 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 Engineering Decision Tree for the unbundling of loops where IDLC is present was presented as an exhibit and modified in the Colorado Workshops.<sup>1</sup>

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<sup>1</sup> Colorado Workshop Exhibit 5-Qwest-37.

4. In her affidavit, Ms. Sheila 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. Qwest began provisioning ISDN loops for CLECs where IPG is present in early 1999. Qwest has continuously provisioned such loops for CLECs through the present time, although this process has not always been easy.<sup>2</sup> Specifically, Qwest has continuously provisioned such loops for Covad since early 1999.

6. Based on Qwest's records of the ISDN loops that were provisioned for CLECs and in service in March 2002, there were over 3200 ISDN or xDSL-I capable loops in service Colorado. Of these loops, 716 -- or approximately 22% -- ISDN loops in Colorado were served using the INA solution. These 716 loops are provisioned to six different CLECs, including Covad and New Edge. Over 20% of Covad's and approximately 10% of New Edge's Colorado ISDN loops in service utilize the ISDN INA di-group solution. As presented in the CMP Redesign meeting by Qwest witness Jean

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<sup>2</sup> Colorado Workshop Transcript, May 25, 2001, at 51: "We're not saying we're not unbundling [IDLC] in those areas. We have acknowledged that we have to unbundle in those areas. We have the processes in place to do that."

M. Liston, the number of ISDN loops currently in service in Colorado utilizing INA solutions has doubled since August of 2000.

7. As of March 2002, there were only 22 IDSL loops in service for Qwest's retail customers in Colorado. This total of 22 IDSL lines includes those with and without the INA technology.

8. To provide the Commission with some background facts, Qwest introduced retail IDSL 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 facility 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.

9. Throughout 2000 and 2001, Qwest worked through the difficulties with the provisioning of loops for DSL services. Qwest's Held Order group worked directly with CLECs, including Covad, to implement alternative solutions recommended by engineering.

10. Discussions during the 271 workshops 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 presented during the workshops apply to all loop types.

11. The following is a summary of Qwest testimony presented during the Colorado 271 workshops:

- For the provisioning of xDSL loops, the CLECs are not required to perform a pre-order loop qualification. Qwest encourages the CLECs to use the loop qualification tools, however it is not a requirement.
- 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 11-step process was introduced with the xDSL FOC Trial in Colorado and filed in the record of this proceeding. In fact, during the workshops Ms. Liston explained that CLECs always had the option to submit an order regardless of what the loop qualification tools stated and Qwest uses the assignment process, including the 11-step process to “locate” compatible facilities.<sup>3</sup>
- During the Colorado workshop, there was a great deal of discussion regarding the technical issues associated with unbundling IDLC. Qwest explained that it was encountering difficulties with the unbundling of IDLC. To help facilitate the provision process for these orders, Qwest created a specialized team within the QCCC to coordinate the provisioning process for coordinated installations that involved IDLC.<sup>4</sup>
- In addition to the dedicated team Qwest committed to unbundled IDLC, Qwest and the workshop participants discussed the IDLC unbundling decision tree. As previously mentioned the Engineering decision tree was presented and revised during the workshop process. To the extent that Qwest created solutions to unbundle IDLC, the solutions apply to all unbundled loop types.
- During the Colorado 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

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<sup>3</sup> Colorado Workshop 5 Transcript, May 23, 2001, at 142-44.

<sup>4</sup> Colorado Workshop 5 Transcripts, May 24 and May 25, 2001.

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.

- There was a brief discussion regarding IDLC and DSL, however the discussion focused on copper loops. Provisioning DSL services other than IDSL requires a clean copper loop and is not compatible with any facility utilizing pair gain technology, including IDLC.<sup>6</sup>

12. During the April 4, 2002 change management redesign meeting, Ms. Liston committed to add information to the unbundled loop PCAT and the Loop Qualification CLEC job aide. This activity is already complete and is posted on the wholesale web-site.

13. Per the Hearing Commissioner’s order, Decision No. R01-1141, Volume VA Impasse Issues, on November 30, 2001 Qwest filed a status report regarding loops provisioned on IDLC. The Commission found Qwest’s performance acceptable and closed the impasse issue.

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

<b>Publication Number</b>	<b>Technical Publication Subject</b>
77350	Installation guidelines
77383	Dark Fiber
77384	UNE Loop
77386	Collocation and Interconnection
77389	UNE Transport

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<sup>6</sup> See Colorado Workshop 5 Transcript, May 25, 2001, at 52.

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

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

16. 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.