

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

Docket No. 97I-198T

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

**AFFIDAVIT OF LYNN M. V. NOTARIANNI IN SUPPORT OF QWEST
CORPORATION'S COMMENTS DEMONSTRATING SATISFACTION OF THE FCC'S
SECTION 271 CHANGE MANAGEMENT EVALUATION CRITERIA**

1. My name is Lynn M. V. Notarianni. I am a Director at Qwest Information Technologies, Inc. ("Qwest IT"), a unit of Qwest Corporation ("Qwest"). My office is located at 930 15th Street, Denver, Colorado, 80202. I oversee Qwest's 271 third-party OSS test, provide testimony on OSS-related matters, and act as a liaison to other Qwest organizations that deal with IT solutions to regulatory issues.

2. In this affidavit, I provide information relevant to Qwest's provision of technical assistance to CLECs, the adequacy of its Electronic Data Interchange ("EDI") documentation, and its EDI interface testing. I also describe the change requests ("CRs") that have been submitted and processed for SATE through the Change Management Process ("CMP").

3. In February 2001, Qwest expanded its CLEC training course curriculum. During calendar year 2001, Qwest made available to CLECs approximately 20 different instructor-led training courses in multiple cities throughout Qwest's 14-state territory. Over 1,000 CLEC employees, representing 198 different CLECs, have attended more than 180 classes covering approximately 20 different courses in 2001. This does not include web-based interactive and downloadable training courses.

4. The information that is set forth in confidential Attachment 4 to my Affidavit regarding the number of CLECs that have engaged in certification testing in the Interoperability environment and in SATE was gathered and prepared by my staff at my direction and is true and correct to the best of my knowledge and belief. As reflected in Attachment 4, as of April 24, 2002, a total of 29 individual CLECs have been certified to use Qwest's EDI and three more CLECs are in the process of EDI certification. Of this total, 26 individual CLECs have tested in the Interoperability environment and subsequently have gone into production. Five of the total number have tested in Qwest's Stand Alone Test Environment ("SATE") and are now in production. One service bureau also has tested in SATE on behalf of five additional CLECs, each of which has been placed into production. (Several of the CLECs who have tested in SATE have also tested in Interoperability.)

5. Two CLECs have been able to construct EDI interfaces and certify products within 107 days of contacting Qwest.

6. Qwest has had in place its Mediated Access for Electronic Bonding for Trouble Administration ("EB-TA") interface, a computer-to-computer interface for maintenance and repair, since 1996 for interexchange carriers and since 1997 for local service providers. Currently, four CLECs have built to Qwest's EB-TA interface.

7. The information about the type, timing, and volumes of EDI transactions that is set forth in confidential Attachments 2 and 3 to my Affidavit was gathered and prepared by my staff at my direction and is true and correct to the best of my knowledge and belief. As reflected in Attachment 3, between April 1, 2001, and March 31, 2002, Qwest processed approximately 957,000 pre-order transactions via EDI for 17 individual CLECs. As reflected in Attachment 2,

between April 1, 2001, and April 14, 2002, Qwest processed approximately 586,000 order transactions via EDI for 22 individual CLECs.

8. It is my understanding that for January, 2002, Qwest released a total of three notifications that I and my staff believe fall within the scope of ROC Performance Indicator Definition (PID) PO-16 (Timely Release Notifications). One notification, Final Technical Specifications for IMA-EDI, was sent on January 21, 2002. The target date for this notification was January 26, 2002. The other two notifications (both of which were untimely) were a Final GUI Release Notice for CEMR and a Final Technical Specifications for CRIS Summary Bill, neither of which involves use of an EDI interface.

9. To the best of my knowledge and belief, Qwest has released three notifications that fall within the scope of PO-16 to date in April, all within the timeframes specified in PID PO-16. Specifically, Qwest released the following notifications subject to PO-16 in April: (1) Draft Technical Specifications for IMA-EDI Release 10.0 on April 4, 2002, target date of April 4, 2002; (2) Draft GUI Release Notice for CEMR Release 1.03.06 on April 4, 2002, target date of April 7, 2002; (3) Final GUI Release Notice for CEMR Release 1.03.06 on April 12, 2002, target date of April 14, 2002.

10. Attachment 1 to my Affidavit is an "Overview of Interface Testing" ("Overview"), which describes the phases of interface testing, and in particular describes the Qwest Interoperability testing environment and Qwest's Stand Alone Test Environment ("SATE"). The Overview also contains diagrams illustrating these aspects of interface testing. The Overview was prepared by me and by my staff at my direction, and is true and correct to the best of my knowledge and belief.

11. SATE was initially designed to accommodate all products that CLECs had ordered through EDI interfaces. Qwest has also employed the change management process to add to the set of products available for testing in SATE. To date, Qwest has submitted 23 CRs for the addition of new products to SATE. After a joint prioritization process by CLECs and Qwest, two of these CRs were highly ranked for inclusion in an upcoming release. CLECs have indicated little or no interest in 15 of the remaining CRs. Qwest therefore announced its plans to withdraw these CRs or transfer to individual CLECs the ownership of these CRs at the regular CMP meeting scheduled for April 18, 2002.