

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 JUDITH M. SCHULTZ IN SUPPORT OF
QWEST CORPORATION'S COMMENTS
DEMONSTRATING SATISFACTION OF THE FCC'S
SECTION 271 CHANGE MANAGEMENT EVALUATION CRITERIA**

1. My name is Judith M. Schultz. I am a Director in the Qwest Corporation wholesale service delivery organization. My office is located at 1005 17th Street, Denver, Colorado. I am currently Director -- Change Management and am responsible for directing the change management process redesign effort and managing the implementation of Qwest's Change Management Process ("CMP").

2. Attachment 1 contains the lists of priority items the CLECs identified as the most important items for discussion and identification of potential impasse issues. The more important issues that may result in impasse were identified as "1's" and the less important issues that were not likely to result in impasse were identified as "0's." Attachment 1 is the most current version of the list, which indicates whether the redesign team reached agreement in concept and whether the team agreed to detailed language regarding these issues. The version of the lists Joint CLECs submitted was not the most current version.

3. The redesign team reached agreement in principle regarding all twelve of the "1" issues and on eight of the ten "0" issues. Of those issues, detailed proposals have been developed for all issues

but one. This issue relates to provisions for the exception process. The team has agreed in principle to the exception process and the team agreed that this issue would not be a controversial issue. The two issues on which the team did not reach agreement in principle do not relate to language that will be incorporated into the CMP document.

4. For the "1" issues, the team agreed to specific provisions for the following four issues: I.A.9 (part 1), I.A.2, I.A.3 , and V.d. The team has discussed detailed proposed language for the following seven of the remaining eight issues: I.A.12, I.A.9 (part 2), I.A.11, I.A.1, V.c, III Part H, and I.A.6. Minor modifications may be necessary for these issues. Qwest has proposed detailed language for the final issue, I.A.7, but the team has not yet discussed it.

5. For the "0" issues, the team agreed to specific provisions for the following three of the ten issues: I.A.4, V.b, and Covad Issue #1. The team has discussed detailed proposed language for the following four of the seven remaining issues: I.A.10, I.A.5, V.e, and V.f. Minor modifications may be necessary for these issues. The team has discussed details to be included in the exception process, Covad Issue #2, but has not yet developed detailed provisions. The team does not believe this issue will be controversial. The remaining two issues, Covad Issue #3 and WorldCom, do not relate to language that will be incorporated in the CMP document. Covad Issue #3 relates to how Qwest identifies retail changes that may impact CLECs and the WorldCom issue relates to how Qwest will prove that it has implemented the changes it has agreed to make.

6. Qwest's record of actual compliance with the redesigned CMP is set forth in the matrix entitled Change Management Improvements, which is attached as Attachment 2. My team and I prepared this matrix. There are several typographical errors in the year referenced in certain of the dates that are corrected as follows:

- In the Process column of the Section 3 row in the matrix, the date should read "August 8, 2001."
- In the Qwest's Record of Compliance column of the Section 4 row, the last date reference in the last sentence should read "September 30, 2001."
- In the Qwest's Record of Compliance column of the Section 5.3 row, the second date reference should read "March 26, 2002."
- In the Qwest's Record of Compliance column of the Section 8.1 row, the first date reference should read "April 4, 2001."
- In the Qwest's Record of Compliance column of the Section 8.2 row, the date for the introduction of "changes to an existing OSS Interface--GUI (CEMR)" should read "April 7, 2002" and the date for "Deployment," which has not yet arrived, should read "May 5, 2002."

With these corrections, the information contained in the matrix is true and correct to the best of my knowledge and belief.

7. The Event Notification regarding NC/NCI codes attached as Exhibit I to the Joint CLEC Brief is not an example of a Qwest-originated product or process change and, therefore, is not subject to the Qwest-Initiated Product/Process Change Process. The example provided refers to an Event Notification regarding a production support issue. It simply listed outdated NC/NCI code combinations Qwest had found on the IMA NC Code Validation database. The Event Notification attached to the Joint CLEC Brief is a closure notification. It refers to the initial notification that Qwest sent to CLECs on March 4, 2002. A copy of the March 4, 2002 Event Notification is attached as Attachment 3.

8. Since 2001, Qwest has substantially revised or created 231 product catalogs ("PCATs") and 27 technical publications ("TechPubs"). Qwest notified CLECs of the opportunity for CLECs to comment or provide feedback regarding all of these PCATs and TechPubs.

