BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into U S WEST Communications, Inc.'s Compliance with § 271 of the Telecommunications Act of 1996	Docket No. UT-003022
In the Matter of U S WEST Communications, Inc.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996	Docket No. UT-003040

QWEST'S RESPONSES TO COMMISSION QUESTIONS ON OSS PARITY AS POSED IN THE SUPPLEMENTAL INTERPRETIVE AND POLICY STATEMENT IN DOCKET NO. UT-970300 (DATED MARCH 15, 2002)

AS VERIFIED BY LYNN M. NOTARIANNI AND CHRISTOPHER J. VIVEROS

JUNE 3, 2002

A. General OSS Questions[1]

1. What operational support systems (OSS) does U S WEST provide to CLECs?

a. Pre-ordering, Ordering, Provisioning OSS

Qwest makes available two electronic interfaces (IMA-EDI and IMA-GUI) for CLECs to use when submitting pre-order transactions or when issuing Local Service Requests (LSRs). CLECs may also perform these functions manually via fax. The IMA-GUI and IMA-EDI provide CLECs with uniform access to the same Qwest OSS across the 14-state region.

In addition, Qwest provides two electronic interfaces (EXACT and TELIS) for CLECs to use when submitting Access Service Requests (ASRs).

Interconnect Mediated Access – Electronic Data Interface (IMA-EDI)
Qwest's IMA-EDI is a real-time, computer-to-computer, electronic interface that allows CLECs access to pre-ordering, ordering and provisioning OSS functions. It enables the electronic submission and processing of pre-ordering inquiries and Local Service Requests (LSRs). IMA-EDI provides electronic access directly from CLEC systems to Qwest's interfaces, and thus enables CLECs to integrate their own OSS with the Qwest electronic interface. A CLEC can connect to IMA-EDI through a direct connection (e.g. a dedicated T-1 line).

Interconnect Mediated Access – Graphical User Interface (IMA-GUI)
Qwest's IMA-GUI is a real-time, human-to-computer, electronic interface that allows CLECs access to pre-ordering, ordering and provisioning functions. The IMA-GUI facilitates electronic submission and processing of pre-ordering inquiries and LSRs. A CLEC can connect to IMA-GUI in any of three ways: (1) through a dial-up modem; (2) through a dedicated connection such as a T-1 line; or (3) through the Internet with Digital Certificate Access. In effect, all a CLEC needs to access the IMA-GUI is a personal computer and connectivity.

The IMA-GUI allows a CLEC to obtain electronic access to various Qwest OSS pre-ordering, ordering and provisioning functions without having to develop its own software. The use of the IMA-GUI therefore involves little to no development time and low start-up costs.

EXchange Access Control Tracking
EXACT functions as a computer-to-computer interface that allows CLECs to order products that require an Access Service Request or ASR (e.g., interconnection

[1] The questions all referenced U S WEST. However, they have been responded to as Qwest Corporation.

trunks). CLECs can submit ASRs directly to EXACT by using their own OSS software.

TELecommunications Information System
TELIS is a front-end application that provides CLECs an electronic method to submit ASRs to Qwest. A CLEC can connect to Qwest's OSS using TELIS through a personal computer and dial-up modem.

b. M&R OSS

Qwest makes available two electronic methods of accessing its M&R services: Electronic Bonding Trouble Administration (EB-TA) and Customer Electronic Maintenance and Repair (CEMR)/Repair Call Expert (RCE). A CLEC may also access Qwest's M&R services by calling a Qwest Service Center.

Both EB-TA and CEMR/RCE trouble tickets flow into Qwest's back-office OSS and enable CLECs to perform the same functions in substantially the same time and manner as Qwest's Retail operations.[2] EB-TA and CEMR/RCE support the same functionality across Qwest's entire 14-state region. The methods through which CLECs can access Qwest's M&R services through these gateways are described more fully below.

EB-TA
EB-TA is a real-time, computer-to-computer interface through which a CLEC can integrate its own systems with those of Qwest for maintenance and repair functions (e.g. submitting a trouble report). It can be used for both non-design and design repairs.

CEMR/RCE
CEMR is a real-time, human-to-computer interface that allows access to M&R functions through the Internet. CLECs access CEMR through a web site using digital certificates. CEMR is used for both design and non-design services. It operates in conjunction with Repair Call Expert ("RCE"), a sophisticated diagnostic tool designed and constructed to efficiently move the user through the repair process step-by-step.

c. Billing OSS

Qwest provides Wholesale bills to CLECs through several media options, in order to ensure that CLECs have a wide range of flexibility and choice. In addition, Qwest sends or makes available billing completion notices to CLECs to notify them when

[2] Qwest's back-office OSS includes Work Force Administration ("WFA") for processing design services trouble tickets and trouble history inquiries, and Loop Maintenance Operating System ("LMOS") for processing non-design services trouble tickets.

the service order or orders have posted successfully to Qwest's CRIS billing system and are waiting to be billed.

Qwest also provides service usage data to CLECs through both Wholesale bills and the Daily Usage File ("DUF"). The DUF contains call records for which Qwest has recorded switch data.

2. What forms of OSS access are available to CLECs for: i) the purchase of unbundled Network elements, ii) the resale of U S WEST retail services, and iii) maintenance and repair?

Qwest makes the following electronic and manual forms of OSS access available to CLECs:

i) The purchase of unbundled network elements

Line Side
IMA-EDI (computer to computer electronic interface)
IMA-GUI (human to computer electronic interface)
Fax / Manual

Trunk Side
EXACT (computer to computer electronic interface) and
TELIS (human to computer electronic interface)
Fax / Manual

ii) The resale of Qwest retail services

IMA-EDI (computer to computer electronic interface)
IMA-GUI (human to computer electronic interface)
Fax / Manual

iii) Maintenance and Repair

EB-TA
CEMR
Fax/Call to Qwest Call Center

3. What testing does U S WEST perform on new OSS systems it provides in order to demonstrate that information will be delivered to new entrants in a timely, accurate, and useful manner?

Qwest performs internal testing on OSS systems and works with CLECs to complete EDI Certification Testing.

Qwest Internal Testing

Internal testing is performed for new releases to existing software. This process includes testing of business case scenarios that cross multiple systems (e.g. order flow through testing). Successful testing ensures new products and services can be ordered, provisioned and billed correctly. The internal testing process also includes tests to verify software modifications and enhancements will function properly.

EDI Certification Testing

Qwest aids CLECs in developing and certifying their EDI interfaces and migrating to new EDI releases. Before a CLEC may interface with Qwest's EDI, the CLEC must complete a certification process that demonstrates that its EDI is capable of effectively interacting with Qwest's EDI. This certification process consists of three stages:

i) Establishing connectivity

The Qwest Implementation and Deployment team is responsible for setting up a CLEC's connectivity to Qwest. The team follows an OSS Dedicated Access Implementation checklist. In addition, Qwest completes a Data Network Information and Requirements form that details the information needed to gain access to Qwest networks for private circuits and external networks. Connectivity testing is performed (a PING test and application access testing) once the circuit is in place and all of the steps on the checklist have been completed.

ii) Progression Testing

In this stage of testing, CLECs submit test transactions to Qwest via the EDI interface to determine whether they receive appropriate responses from Qwest's systems. Qwest provides two distinct environments for testing: the Interoperability Environment and the Stand-Alone Test Environment (SATE). CLECs can choose to test in the Interoperability Environment, SATE, or both; testing in these environments is not mutually exclusive.

The Interoperability Environment uses a copy of the production IMA EDI software, thereby providing a production-like environment in which CLECs may test.

SATE provides a CLEC with the ability to learn how Qwest's IMA-EDI functions work and the ability to test its interface in a test environment that returns pre-defined test scenarios that mimic production responses.

iii) Controlled Production

After successfully completing the initial stages of the EDI certification process (establishing connectivity and progression testing), CLECs must complete Controlled Production ("CP") before being fully certified for

EDI use. Controlled Production serves as a final check to ensure that a CLEC's EDI interface functions as designed in the production environment. It also affords both Qwest and the CLEC the assurance that all necessary production connectivity and environment activities have been successfully completed on both sides of the gateway. After meeting specified exit criteria, the CLEC is considered certified in the production environment.

4. Is OSS access provided to Washington CLECs pursuant to uniform interfaces intended for nationwide or region-wide implementation?

Yes, OSS access is consistent across Qwest's 14 state region. In addition, electronic interfaces have been implemented using national standards and guidelines.

Pre-Ordering / Ordering / Provisioning

Interface	**Standards / Guidelines**
IMA-EDI	OBF LSOG, TCIF SOSC EDI, ANSI X.12
IMA-GUI	OBF LSOG, HTML, TCP/IP
EXACT	OBF ASOG
TELIS	OBF ASOG

M&R

Interface	**Standards / Guidelines**
EB-TA	CMIP, ANSI X.227 and X.228

Billing

Interface	**Standards / Guidelines**
CRIS – Usage	EMI OBF
IABS	BOS

5. A) What is the current capacity for each of U S WEST's OSS systems (i.e. number and type of transactions that can be processed within specific time frames, the number of competitors that can be supported, etc.)?

The capacity for both Qwest electronic interfaces provided to CLECs and Qwest internal systems is determined by the usage on the server rather than the number and type of transactions that can be processed within specific time frames, or the number of competitors that can be supported.

B) What are U S WEST's plans to expand such capacity?

With respect to the IMA gateway, Qwest currently has an approved IMA Scalability Process. This process establishes the activities and criteria used to determine if the

IMA gateway and its components are able to meet the projected capacity and scalability requirements.

Load and Performance tests demonstrate system scalability in relation to monthly capacity projections and IMA Release dates. Specific steps of this process are conducted daily to monitor current production activity and other steps are conducted monthly to report the scalability.

Currently Qwest systems are currently sized larger than projected volumes for Pre-Order and Order.

With respect to other Qwest OSS, Qwest actively monitors system capacity. As capacity issues arise, Qwest's capacity planning organization addresses the issues and increases capacity as necessary.

C) Does U S WEST believe this capacity is sufficient to meet CLECs needs?

Yes, Qwest believes that Qwest Wholesale systems and customer support personnel capacity are sufficient to meet CLECs' needs.

Systems
With respect to the systems capacity, Qwest electronic interfaces and Qwest's OSS accessed by these interfaces have sufficient capacity to handle current volumes and are constantly monitored to ensure their ability to meet reasonable foreseeable, future demand. Capacity, as used here, means the physical sizing of computer hardware and software, including memory, storage devices and processing power (central processing units [CPU]), to ensure the ability to handle specific volumes of data. Capacity planning is required whenever Qwest introduces an interface or OSS into its operational environment. This planning begins in an early stage of the project and is constantly reassessed as the project progresses.

Qwest has various organizations responsible for capacity planning. The process and individuals responsible for these systems maintain both the systems that support retail customers and those that support wholesale customers.

Personnel

Center Capacity
Qwest has established Service centers and repair centers to support CLECs' operations. They are properly staffed and can handle current and reasonably foreseeable volumes. Capacity, as used here, means the ability of the human resources to meet current and expected demand. As LSR and trouble report volumes fluctuate, Qwest continuously monitors the need to adjust center capacity.

Wholesale Order Center Forecasting

Qwest Account Managers have regular contact with CLECs and attempt to gather volume forecasts on an on-going basis. Qwest considers these forecasts when allocating resources for each center, and center performance is monitored on a regular basis.

As the current competitive and economic environment and related changing customer needs drive fluctuations in demand, Qwest has established processes to monitor demand on a daily, weekly, monthly, quarterly and annual basis. This understanding of demand enables Qwest to dedicate Wholesale Center resources in a timely and responsive manner.

Qwest also estimates future demand based on internal research and industry trends. Wholesale Centers supplement the forecasts with historical LSR volumes, repair ticket volumes, and call volumes to determine resource planning needs.

D) Please provide any test results that support U S WEST's representations of the capacity of its OSS systems.

KPMG Consulting administered a 271 3rd Party Test of Qwest's OSS. The results of the following tests support Qwest's representations of its OSS capacity:

- Test 12.8 – Manual Order Processing Test (included capacity evaluation)
- Test 15 – POP Volume Performance Test
- Test 16 (Phase 3) – M&R CEMR Volume Test
- Test 18.7 – M&R Work Center Support Evaluation
- Test 18.8 – End to End M&R Process Evaluation

Please see the Qwest Corporation's Verified Comments Regarding the ROC Final OSS Test Report[3] for a detailed description of these tests and the test results.

6. What steps has U S WEST taken to ensure nondiscriminatory access to OSS for each checklist item?

Qwest collaboratively negotiated and executed the ROC OSS Third Party Test, which is discussed in Qwest Corporation's Verified Comments Regarding the ROC Final OSS Test Report.[4] In addition, during the design of the ROC OSS Third Party Test, Qwest, the ROC TAG, and the CLECs collaboratively negotiated and agreed to performance measures and their associated benchmarks.

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3 *See* Sections III.C.1,3,4; IV.B.2,4; IV.D.1,4,5

4 *See* Section III.B

7. A) What training has U S WEST provided for each available ordering interface to its own employees?

Qwest provides training for Wholesale service representatives on each interface as described below:

Internal Systems Training

ISC Initial Systems training – Six weeks instructor-led training with two weeks on-the-job nesting.

Initial Systems for Complex Design – Six days with three days on-the-job nesting.

External Systems Training

Firm Order Manager - One half-day instructor-led training and three days on-the-job peer tutoring. FOM is the internal system used to monitor and correct CLEC input to IMA.

IMA Hands On – One day instructor-led class training center personnel how CLECs use IMA.

IMA Release Training – 2 hours, six times annually. This training covers changes to IMA / FOM caused by upgrades to the IMA system.

IMA Product Training – 8 courses, 2-4 hours each of web-based training on ordering specific products using the IMA system.

B) Describe the procedures used for training new U S WEST service representatives on CLEC interface systems.

Qwest training for Wholesale service representatives on CLEC interface systems includes a large proportion of instructor-led courses, which focus on basic and in-depth understanding of all applicable material. Training is mandatory for new Qwest personnel. Ongoing updated and refresher training courses are provided for all Qwest personnel. Web-based training is used throughout the training procedure as a training tool and a "ready access" tool for job aids and knowledge base storage.

C) Describe the procedures used for training new U S WEST service representatives on U S WEST internal OSS systems.

Qwest training for Wholesale service representatives on Qwest internal OSS systems includes a large proportion of instructor-led courses, which focus on basic and in-depth understanding of all applicable material. Training is mandatory for new Qwest personnel. Ongoing updated and refresher training courses are provided for all Qwest

personnel. Web-based training is used throughout the training procedure as a training tool and a "ready access" tool for job aids and knowledge base storage.

D) What proportion of training time do new representatives spend learning about U S WEST internal OSS systems versus CLEC OSS interfaces?

The approximate percentage of Wholesale service representative training time spent on internal systems to external systems is 70% internal and 30% external. The IMA external system is a single gateway from which the CLEC submits orders and comparatively, requires less training than internal systems. A larger portion of new Wholesale service representative training is focused on the numerous internal systems that interact with and support a successful CLEC service request.

8. A) What training has U S WEST (or its subcontractors) provided to CLEC employees on its OSS interfaces?

All current training offered to CLECs is listed in the Course Catalog posted on Qwest's Wholesale web site. The Course Catalog can be accessed at http://www.qwest.com/wholesale/training/coursecatalog.html.

The catalog lists over 75 classes for product, process, and system training available to Qwest's wholesale customers. Classes are either instructor-led or web-based.

Throughout Qwest's 14-state territory in 2001, over 1,000 employees, representing 198 different companies, attended more than 180 classes offered to CLECs. In the first quarter of 2002, over 170 employees attended 27 classes offered to CLECs.

B) How much are CLECs charged for the training provided?

Qwest currently does not charge CLECs for instructor-led or for web-based training.

Class schedules and information (such as date, location and charge) are posted at: http://www.qwest.com/wholesale/training/course_sched_reg.html.

9. How does timing for meeting competitor's demands for service compare with the timing under which U S WEST provides such items to itself or its own retail customers?

PID measure OP-3 measures "Installation Commitments Met" for both wholesale and retail customers. This measure evaluates the extent to which Qwest installs services for customers by the scheduled due date. These results are posted on the following web site: www.qwest.com/wholesale/results. The results show wholesale parity with retail.

10. A) What is the personnel turnover rate at U S WEST's Local Service Center (LSC), specifically for order processors, account representatives, and customer support managers?

Qwest assumes that "Local Service Center" refers to its Interconnect Service Center.

Qwest assesses turnover rate in two categories, Occupational and Management.

- The occupational (order processor, etc.) turnover rate over a 12-month period is 2.6% (monthly average).

- The management (manager, trainer, account representative, etc.) turnover rate over a 12-month period is 0.4% (monthly average).

B) How long does it take to train each of these types of LSC personnel?

Initial training on systems and processes is approximately eight weeks for any job position (order processors, account representatives, and customer support managers). After initial training, employees attend continuation training focused more on ordering and provisioning of products. Full proficiency is expected in approximately 18 months for any function (for a new hire with little or no telephony background).

C) At the LSC, is there a mixing of personnel between retail/wholesale operations?

No, Interconnect Service Center personnel are Wholesale employees and only deal with Wholesale products and customers.

11. Does U S WEST provide integration between U S WEST's interfaces for preordering and ordering functions so that manual re-entering does not have to occur?

Yes, Qwest provides pre-order information in a manner that supports a CLEC integrating pre-ordering and ordering functions when developing an IMA-EDI interface. For each pre-order query transaction, Qwest's EDI Disclosure Document[5] provides the parsed data elements that will be returned and the association of each data element to a specific LSR field.

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[5] *See* http://www.qwest.com/disclosures/netdisclosure409.html

The IMA-GUI interface is integrated between pre-order and order. The responses to the pre-order query transactions are used to automatically populate other related fields of the LSR.

12. When completing pre-ordering inquiries and orders, is the information and interface type provided to competitors analogous to what U S WEST provides itself?

Yes, Qwest provides CLECs with access to pre-ordering and ordering functions in substantially the same time and manner as it provides such access to itself.

The results of the following KPMG Consulting 271 3rd Party Tests support this statement:

- Test 12 – Pre-Order / Order Functionality Test
- Test 12.7 – Loop Qualification Parity Test

Please see the Qwest Corporation's Verified Comments Regarding the ROC Final OSS Test Report[6] for a detailed description of the tests and the test results.

13. A) In the past, how have OSS interface specifications been made available to potential competitors?

In the past and currently, Qwest provides CLECs the specifications and/or user guides for interfaces to: Pre-Ordering, Ordering, Post-Ordering, Provisioning, Maintenance and Repair and Billing.

Qwest provides an open, easily accessible web site that includes a comprehensive listing of product and service descriptions, guidelines, job aids, notifications, training information and much more.[7] The web site provides CLECs with a wide range of user-friendly information enabling them to easily work through the documented steps to do business in Qwest territory. In addition to the extensive written documentation on the web site, Qwest provides contact names and numbers. Interconnect Process Managers are available to help CLECs work through the initial application material and a negotiation team works to assure the Interconnection process progresses

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6 *See* Sections III.C.1; IV.A; IV.B.1

7 Web site information includes the IMA EDI Information Guide, the EDI Implementation Guidelines for Interconnect Mediated Access (IMA) and the IMA EDI Disclosure Document – all accessible at http://www.qwest.com/wholesale/ima/edi.

Also included on the web site is the *IMA Connection Guide* – accessible at http://www.qwest.com/wholesale/ima/gui.

smoothly. After a CLEC decides to do business in Qwest territory, a Qwest Account Team is assigned to the CLEC to act as its advocate/facilitator within Qwest.

B) What system design and general information is U S WEST providing to CLECs about future modifications or design changes which will be necessary for interfacing with upgraded U S WEST legacy and access systems?

Since 1999, Qwest and CLECs have jointly participated in a forum for managing changes related to Qwest's products, processes, and systems that support the five categories of OSS functionality (pre-ordering, ordering, provisioning, maintenance and repair and billing).

The Change Management Process (CMP) is used to process and communicate to CLECs any changes to Qwest's OSS interfaces and to products and processes that are within the scope of CMP. The process also provides CLECs the opportunity to have input into Qwest-proposed changes and to propose their own.

Changes to Qwest OSS interfaces, products, or processes must be communicated to CLECs according to agreed-upon timeframes contained in the CMP. Qwest provides to CLECs, on a quarterly basis, its twelve-month systems development view (known as the Qwest OSS Release Calendar), which shows, at a high level, the development plans for all OSS interfaces that Qwest offers to CLECs. This information helps CLECs plan for upcoming OSS changes.

CMP documentation is extensive and available on the Qwest Wholesale CMP web site.[8]

14. Are there any functional issues within the interfaces provided by U S WEST that result in more steps or additional time spent by CLECs? (Examples: having to scroll through long lists; ability to utilize "inquiry modes" to validate data before submitting orders, etc.)

No, there are no functional issues within the interfaces provided by Qwest that result in more steps or additional time spent by CLECs.

The following KPMG Consulting 271 3rd Party Test results support this statement:

- Test 12 – Pre-Order / Order Functionality Test
- Test 15 – POP Volume Performance Test
- Test 16 (Phase 2) – CEMR Functional and Performance Evaluation
- Test 17 – MEDIACC EB-TA Functional Evaluation

8 *See* http://www.qwest.com/wholesale/cmp/index.html

- Test 18.8 – End to End M&R Process Evaluation

Please see the Qwest Corporation's Verified Comments Regarding the ROC Final OSS Test Report[9] for a detailed description of these tests and the test results.

15. What is U S WEST's experience with "operational readiness" problems (for example, software system "lock ups" or shut downs)? What are the problems, and how often do they occur?

Qwest's "operational readiness" for the interfaces to the OSS systems is measured by Gateway Availability Performance Indicator Definitions (GA PIDs). The 1st quarter 2002 GA PID results are as follows:

	Jan. 2002	Feb. 2002	Mar. 2002
(GA-1 A) Gateway Availability – IMA-GUI All	100.00%	99.91%	100.00%
(GA-1 B) Gateway Availability – IMA-GUI Fetch-n-Stuff	99.50%	100.00%	100.00%
(GA-1 C) Gateway Availability – IMA-GUI Data Arbiter	99.50%	100.00%	100.00%
(GA-2) Gateway Availability – IMA – EDI	100.00%	99.91%	100.00%
(GA-3) Gateway Availability – MEDIACC / EBTA	100.00%	100.00%	99.79%
(GA-4) Gateway Availability – EXACT	100.00%	100.00%	100.00%
(GA-6) Gateway Availability – GUI Repair (CEMR)	100.00%	100.00%	99.77%

The GA PID benchmarks are negotiated in the Technical Advisory Groups (TAG) meetings. The benchmark for all GA PIDs is 99.25%. As seen in the table above, Qwest met the benchmark for GA-1, GA-2, GA-3, GA-4 and GA-6 in each month during the 1st quarter of 2002. These results are posted on the following web site: www.qwest.com/wholesale/results.

There were five events impacting gateway availability during the 1st quarter of 2002. The types of events and their frequency are summarized in the following table:

- IMA-GUI processed over 2,130,000 transactions during the 1st quarter of 2002. Two events (one related to GA-1A and one related to GA-1B) affected IMA-GUI availability, but had little impact on the overall PID results.

- IMA-EDI processed over 728,000 transactions during the 1st quarter of 2002. One event (related to GA-2) affected IMA-EDI availability, but had little impact on the overall PID result.

- EB-TA processed over 44,000 transactions during the 1st quarter of 2002. One event (related to GA-3) affected EB-TA availability, but had little impact on the overall PID result.

9 *See* Sections III.C.1,3,4; IV.B.1,4; IV.D.1,2,5

- CEMR processed over 47,000 transactions during the 1st quarter of 2002. One event (related to GA-6) affected CEMR availability, but had little impact on the overall PID result.

OSS systems not measured by the Gateway Availability PIDs include TELIS, CRIS and IABS. None of these systems experienced "lock ups" or "shut downs" during the 1st quarter of 2002.

B. Pre-Order

1. A) Does U S WEST provide equivalent access to due dates (the date on which the order is scheduled to be completed) for service installation?

Yes, Qwest procedures do provide Wholesale and Retail equivalent access to due dates for service installation.

Both the Wholesale and Retail process for assignment of service installation due dates includes submitting a pre-order query to a facility availability tool, receiving a dispatch response, then obtaining a due date via Appointment Scheduler or based upon standard product intervals.

B) Is the method of calculating due dates equivalent to the method U S WEST uses for its retail operations?

Yes, the method of calculating due dates is equivalent for Qwest's Wholesale and Retail operations. As mentioned in response to the previous question, the process and data sources used to obtain service installation due dates are equivalent for Wholesale and Retail.

2. A) Does U S WEST provide equivalent access to telephone numbers?

Yes, Qwest procedures do provide Wholesale and Retail equivalent access to telephone numbers.

B) Does U S WEST limit the quantity of telephone numbers that a CLEC can reserve in a central office for either an individual customer or on the aggregate basis of all reservations made by a CLEC?

No, Qwest does not limit the quantity of telephone numbers that the CLECs can reserve in a central office for either an individual customer or on an aggregate basis.

C) Is there an equivalent restriction that applies to U S WEST's retail operations?

As is the case with Qwest's Wholesale process, Qwest's Retail process places no system limitations on the quantity of telephone numbers that can be reserved in a central office for either an individual customer or on an aggregate basis.

3. For pre-ordering information do CLECs have access that is equivalent to that of U S WEST's retail representatives?

Yes. Please see the answer to Section A – General OSS Questions, Question 12.

C. Ordering/Provisioning

1. How and when does U S WEST provide a new entrant information concerning the status of the new entrant's resale or UNE order?

All order status is handled in the same manner whether for resale or UNE orders. The process does not make a distinction between a new or existing CLEC. Electronic notices are transmitted via the interface used to submit the LSR, while notices for LSRs submitted manually are transmitted via fax. A CLEC is provided the following status with all order activity:

- Firm Order Confirmation notice (FOC)
  FOCs are issued when a CLEC submits an order electronically (EDI-GUI) or manually (Fax). This notification confirms that the CLEC service request has been accepted into the Qwest ordering system.

- Service Order Completion notice (SOC)
  [SOCs are issued when a CLEC submits an order electronically (EDI-GUI). This notification informs the CLEC that the order activity is complete.

- Billing Completion notice
  Billing Completion notices are issued when a CLEC submits an order electronically (EDI-GUI). This notification informs the CLEC that billing for service is ready to commence.

Qwest also sends two types of Error Reject notifications to CLECs:

- Business Process Layer (BPL) Rejects
  Upon submission of a LSR, if a required field has not been populated, IMA will immediately respond back to the CLEC with a BPL reject message. This message will detail what the error is and on which form it appears.

- Error Notices
  This type of notice alerts the CLEC to a non-fatal error after a LSR has successfully gone through IMA. The Error Notice contains the non-fatal error code and a reason, and the changes necessary to correct the LSR.

Finally, Jeopardy notifications are sent to CLECs when Qwest is unable to meet the commitment date of a particular LSR. Jeopardy notifications tell CLECs when a due date is at risk and enables them to inform their end-user customers accordingly.

2. Describe order rejection rates for retail, resale, and UNE orders. For resale and UNEs break down the rates by the type or interface used – both electronic and manual, as well as different software types.

Qwest Retail customers submit orders for service verbally via the telephone to Qwest Retail representatives. Any "rejections" that may occur would occur verbally with the retail customer on the line; therefore, Qwest does not have order rejections rates related to retail orders.

Qwest has two PID measurements for CLEC order rejections, PO-3, LSR Rejection Notice Interval and PO-4, LSRs Rejected. The results are provided by ordering interface rather than by product. PO-4 is a diagnostic measurement and does not provide pass/fail results. PID results are posted on the following web site: www.qwest.com/wholesale/results.

PO-3 monitors the timeliness with which Qwest notifies CLECs that the LSRs Qwest received via IMA-GUI (PO-3A), IMA-EDI (PO-3B), and Fax (PO-3C) were rejected. LSRs with invalid product codes, lacking data essential to the measurement per the PID, duplicate LSR numbers, and invalid start/stop dates/times are excluded from the results.

PO-4 monitors the extent LSRs received via IMA-GUI (PO-4A), IMA-EDI (PO-4B), and Fax (PO-4C) are rejected as a percentage of all LSRs. This information is helpful in addressing potential issues that might be raised by the indicator of LSR rejection notice intervals.

Please see the Qwest Corporation's Verified Comments for a discussion of PO-3 and PO-4 results.[10]

3. For both retail and resale, compare rejection rates for POTS services.

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10 *See* Section IV.B.5

Qwest is not able to compare rejection rates for retail and resale POTS services because, as explained in the response to Section C – Ordering / Provisioning, Question 2, Qwest does not have retail rejection rates.

4. A) How does U S WEST notify a CLEC that an order has been rejected?

Notifications are faxed, emailed or returned to the CLEC via IMA-GUI or IMA-EDI based on which electronic system was used by the CLEC to submit service requests.

B) How long does it take for an order rejection notice to be issued?

Qwest provides this information in PO-3, which measures the interval between the receipt of a Local Service Request (LSR) and the rejection of the LSR for standard categories of errors/reasons. PID results are posted on the following web site: www.qwest.com/wholesale/results.

Please see the Qwest Corporation's Verified Comments for a detailed discussion of PO-3 results.[11]

5. Provide statistics for loss of dial tone for customers leaving U S WEST and returning to U S WEST, separated on a resale and facilities basis. List the number of customers affected by loss of dial tone and for each separate category provide the average number of minutes of dial tone loss.

Customers that leave Qwest via resale do not experience dial tone loss because it is essentially a records change.

The primary Performance Indicators (PIDs) that provide the statistics for Qwest's performance in this area are OP-17, MR-11 and MR-12. PID results are posted on the following web site: http://www.qwest.com/wholesale/results.

Generally speaking, there have been only a handful of trouble reports for each state each month for number portability while Qwest ports an average of over fifty thousand telephone numbers each month.

6. Delineate order rejections by cause (U S WEST error versus CLEC error). If U S WEST states the error rate is the result of user error, provide adequate support for this contention.

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11 *See* Section IV.B.5

Qwest does not reject LSRs due to Qwest errors. In the event of a Qwest error that places an order in jeopardy, a jeopardy notice is sent to the CLEC. Therefore, the error rate can only be based on the LSRs that are rejected due to CLEC errors.

7. A) What information does U S WEST provide to CLECs concerning its internal editing and data formatting requirements?

For IMA-EDI Users

The details of each IMA EDI form/field are identified in the *IMA EDI Disclosure Document*[12], which is posted to the web for each release. The Disclosure Document includes the specific fields by form, the OBF field reference, their usage by product, business rules associated with the fields by product, field length, characteristic values and valid values.

Each of these fields can potentially be edited and a complete list of all IMA errors that may result from an edit are located in an *IMA EDI Errors List*[13], which is posted to the web for each release.

Qwest also produces the *IMA EDI Corrective Procedures and Error Codes*[14] document that helps CLECs to use the *IMA EDI Errors List*. Additionally, there is an appendix within the *IMA EDI Disclosure Document* that identifies additional edits. These additional edits check the data being submitted in a field against the data in a Qwest back-end system.

For Manual and IMA-GUI Users

The *Qwest LSOG*[15] provides for manual and IMA-GUI users the same type of information that the *IMA EDI Disclosure Document* provides for IMA-EDI users. Where applicable the two documents are in sync (i.e. where a field is common across manual, EDI and GUI).

B) Is this information adequate for successful processing of CLECs' orders through both U S WEST's interface and its internal systems?

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12 *See* http://www.qwest.com/wholesale/ima/edi

13 *See id*.

14 *See id*.

15 *See* http://www.qwest.com/wholesale/clecs/lsog.html

Yes, the information is adequate for successful processing of CLECs' orders through both Qwest's interface and its internal systems.

KPMG Consulting's 271 3rd Party Test results for Test 12 – Pre-Order / Order Functionality Test, support this statement. Please see the Qwest Corporation's Verified Comments Regarding the ROC Final OSS Test Report[16] for a detailed description of Test 12 and Test 12 results.

8. A) In what manner does U S WEST provide order status notices to CLECs?

As outlined in response to Section C – Ordering/Provisioning, Question 1, Qwest provides order status notices to CLECs as follows:

Notices are delivered electronically if the order is submitted electronically by the CLEC, and manually (either by fax or e-mail) if the order is submitted manually by the CLEC.

B) Are equivalent notices used by U S WEST internally on its own orders? How are those notices provided? Demonstrate that the notices are offered at parity for CLECs and U S WEST's own internal usage.

No, Qwest does not provide its retail service representatives with order status notices.

9. A) Does U S WEST provide CLECs with error notices and are those notices used by U S WEST when it provisions a retail service?

Yes, Qwest provides CLECs with error notices whether the service requests are submitted manually or electronically.

Qwest does not provide its retail service representatives with error notices.

B) If the notices differ, how do they differ? Are notices provided by U S WEST in the same manner as the order was received (e.g. electronic, fax, phone call)?

The notices differ in that Qwest does provide error notices to CLECs, but not to its retail service representatives.

Under Qwest Wholesale process, if a CLEC submits a service request electronically, Qwest will deliver any error notices electronically. If a CLEC submits a service request by fax, Qwest will contact the CLEC by phone to explain any error notices.

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16 *See* Sections: III.C.1; IV.B.1

C) In what time frame are the notices provided to CLECs and internally to U S WEST?

Performance Indicator PO-3 measures the interval between the receipt of a LSR and the rejection of the LSR for standard categories of errors/reasons. As mentioned in the response to Section C – Ordering / Provisioning, Question 4B, throughout 2002, Qwest has successfully passed the benchmark for PO-3 in Washington and Qwest's Western Region. PID results are posted on the following web site: www.qwest.com/wholesale/results.

10. How long does it take U S WEST to provide firm order confirmation notices (FOCs)? Identify the retail analogue of FOCs and report separately for manual and electronic responses. Does the response time meet U S WEST's contractual obligations contained in all interconnection agreements?

Performance Indicator PO-5 measures FOC timeliness. (FOC timeframes in the interconnection agreements are based on the PO-5 negotiated timeframes in the PID.) PID results are posted on the following web site: http://www.qwest.com/wholesale/results.

The Qwest retail procedures do not include a FOC to the Qwest retail customers. The FOC is an additional notification of order status that is provided only to CLECs.

Please see the Qwest Corporation's Verified Comments for a discussion of PO-5 results.[17]

11. A) Does U S WEST provide order jeopardy notices?

Qwest does provide order jeopardy notification. Under Qwest Wholesale process, if a CLEC submits a service request electronically, Qwest will deliver any jeopardy notices electronically. If a CLEC submits a service request by fax or email, Qwest will deliver any jeopardy notices using fax or email.

B) Does it provide notices for both problems caused by the CLECs or their customers, and those that are caused by U S WEST itself?

Formal measurements require jeopardy notification for Qwest caused misses only. However, Qwest sends a jeopardy notification whenever it detects that an LSR has gone into Delayed Order Status.

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17 *See* Section IV.B.1.c

C) When are jeopardy notices provided?

As soon as Qwest finds a jeopardy condition, the Qwest Interconnect Service Center is notified. The ISC contacts the CLEC in the same manner in which the service request was submitted (i.e. electronically or manually). Qwest may identify the jeopardy condition at any time between the application and due date.

D) What percentage of the notices have been issued before the original due date requested on the order and what percentage after that date?

Official measurements only include notices issued before the due date. There are no measurements for those notices issued on or after the due date. Two key current Service Performance Indicator measurements are PO-8 and PO-9.

- PO-8 Service Performance Indicators (PID) measures the timeliness of jeopardy notifications, focusing on how far in advance of original due dates jeopardy notifications are provided to CLECs. This indicator measures the average time lapsed between the date the customer is first notified of an order jeopardy event and the original due date of the order.

- PO-9 Service Performance Indicators (PID), measures (when original due dates are missed) the extent to which Qwest notifies customers in advance of jeopardized due dates. This indicator measures the percentage of late orders for which advance jeopardy notification is provided.

E) Does U S WEST use jeopardy notices in provisioning its own retail services? Provide equivalent information on timeliness of notice issue?

No, Qwest does not use jeopardy notices in provisioning its own retail services.

12. Provide data showing average installation intervals for both resale and retail. The parity measurement used should be the time frame from when U S WEST first receives an order to when service is installed.

OP-4 measures installation intervals for both wholesale and retail customers. This measure evaluates the timeliness of Qwest's installation of services for customers, focusing on the average time to install service. These results are posted on the following web site: http://www.qwest.com/wholesale/results. Qwest consistently met parity in installation intervals for most areas.

KPMG Consulting's 271 3rd Party Test results for Test 14.7 – Provisioning Process Parity Evaluation, support this statement. Please see the Qwest Corporation's

Verified Comments Regarding the ROC Final OSS Test Report[18] for a detailed description of Test 14.7 and Test 14.7 results.

13. How is U S WEST providing nondiscriminatory access to OSS functions so that CLECs are enabled to submit orders for unbundled network elements in a timely manner? Where possible U S WEST should include preordering, order, and installation comparisons to retail analogues. Responses should include time comparisons for various OSS functions.

In the collaboratively negotiated ROC OSS Third Party Test, which is discussed in Qwest Corporation's Verified Comments Regarding the ROC Final OSS Test Report,[19] Hewlett Packard Company (HPC), as the pseudo-CLEC, initiated and evaluated a broad set of transactions, including pre-order and order transactions. In addition, KPMG Consulting evaluated installation by reviewing the adequacy and adherence to methods & procedures, as well as observing all aspects of order provisioning and the interaction between Qwest and the CLECs during actual commercial processing of orders.

Please see the Qwest Corporation's Verified Comments Regarding the ROC Final OSS Test Report[20] for more information on a detailed description of Tests 12 and 14 and their results.

14. For UNEs, what problems have CLECs experienced with high rejection rates and untimely status notices?

Qwest can not speak to the problems CLECs have experienced, but can provide general information regarding rejection rates and status notices.

Rejection rates, as measured in PO-4, are discussed in more detail in Section C – Ordering/Provisioning, Question 2.

Qwest provides timely status notices, as indicated by PO-3, PO-5, PO-8 and PO-9, which are addressed in more detail in Section C – Ordering/Provisioning, Questions 2, 4, 10 and 11. More information relating to the timeliness of status notices can be found in PO-6 (for Work Completion Notification Timeliness) and PO-7 (for Billing Completion Notification Timeliness). PID results are posted on the following web site: www.qwest.com/wholesale/results.

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18 *See* Sections: III.C.1; IV.C.2

19 *See* Section III

20 *See* Sections: III.C.1; IV.C.2

Please see the Qwest Corporation's Verified Comments for a discussion of PO-3, PO-4, PO-5, PO-6, PO-7, PO-8 and PO-9 results.[21]

15. What is the level of manual processing involved in the ordering and provisioning of UNEs?

Qwest measures the extent to which its processing of CLEC LSRs is completely electronic in PO-2. PID results are posted on the following web site: www.qwest.com/wholesale/results.

- PO-2A-1 measures flow through for all UNE-Loop LSRs received via IMA GUI. PO-2B-1 measures the flow through rate for LSRs submitted via IMA GUI that are also flow through eligible.
- PO-2A-2 measures flow through for UNE-Loop LSRs submitted via IMA EDI. PO-2B-1 measures the flow through rate for LSRs submitted via IMA EDI that are also flow through eligible.

Please see the Qwest Corporation's Verified Comments for a discussion of PO-2.[22]

D. Repair, Maintenance, and Billing

1. What type of recording and other data does U S WEST provide that allows carriers to properly bill end users, interconnecting local carriers, and toll carriers?

Qwest provides CLECs with records for service usage data in EMI format. This data is transmitted and appears on both the CLEC's regular Wholesale bill and in a daily electronic feed called the Daily Usage File, or DUF. The DUF contains the call records that detail the usage data Qwest records at its end office switches.

2. Provide comparisons between U S WEST's retail services and resold services for each of the following:

A) How are trouble tickets entered into U S WEST's maintenance system for CLECs and their customers.

To better serve the wide-range of CLEC preferences and capabilities, Qwest makes available two electronic methods of accessing its M&R services: Electronic Bonding

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21 *See* Sections IV.B.1,5,6

22 *See* Sections IV.B.1.b

Trouble Administration (EB-TA), Customer Electronic Maintenance and Repair ("CEMR")/Repair Call Expert (RCE). A CLEC may also access Qwest's M&R services by calling a Qwest Service Center.

The two electronic interfaces, EB-TA and CEMR/RCE, flow through into Qwest's back-end OSS and enable CLECs to perform the same functions in the same manner as Qwest's Retail operations.[23] The manual process of calling a Qwest Service Center also enables CLECs to perform functions analogous to Qwest's Retail operations.

The Qwest retail process begins with a call from a Qwest retail customer to a Repair Service Attendant (RSA). The RSAs use RCE to enter non-design trouble reports into LMOS and Deliver to input design reports into WFA. They also input trouble directly into WFA. Deliver is being phased out and Qwest plans to move this functionality into RCE.

B) What is the average time for a trouble ticket to clear for basic POTS, Centrex and PBX trunks? Time calculations should commence with when the trouble ticket was received by U S WEST.

Qwest PID measure MR-6 measures the mean time to restore or average time for a trouble ticket to clear, with the interval commencing with when the trouble ticket is received and ending when the trouble is cleared. MR-6 is a parity measure, meaning that Wholesale and Retail results are compared.

MR-6, for POTS, Centrex and PBX, is measured by Dispatches within MSA, Dispatches outside MSA and No Dispatches. PID results are posted on the following web site: www.qwest.com/wholesale/results. The results clearly show wholesale parity with retail was met.

C) For trouble tickets not requiring dispatch, how are trouble reports cleared and appropriate service representatives notified?

Non-Design Service
For non-design service tickets, after the trouble is repaired, the Qwest inside technician or Maintenance Administrator attempts to notify the CLEC or Qwest retail customer, and then closes the ticket.

Design Service
If the trouble ticket is a design service that involves a CLEC, the inside technician, when closing the ticket, first contacts the Qwest Customer Communications Technician ("CCT") with the results of the repair. The CCT, in turn, contacts the

[23] Qwest's back-office OSS includes Work Force Administration ("WFA") for processing design services trouble tickets and trouble history inquiries, and Loop Maintenance Operating System ("LMOS") for processing non-design services trouble tickets.

CLEC, provides the trouble ticket disposition, and asks the CLEC to verify that the trouble no longer exists. Provided that this confirmation is accomplished, the CLEC authorizes Qwest to close the ticket. If the CLEC cannot be reached, the CCT may leave a CLEC representative a voice or electronic mail message. The CCT will try to contact the CLEC three times within a 24-hour period prior to closing the ticket. The reason the Qwest CCT tries to contact the CLEC when a design service is involved is that further verification and testing by the CLEC may be needed to ensure the trouble has been addressed.

The Retail procedure for closing a design service trouble report and notifying the customer is analogous to the Wholesale process.

D) For trouble tickets requiring dispatch, what is the standard interval for repair completion for each of the service groups listed in (b)? What percentage of repair dispatch meets those standard interva1s?

Qwest PID measures MR-3 (Out of Service trouble Cleared within 24 hours) and MR-4 (All troubles cleared within 48 hours) measure Qwest's objectives for standard repair intervals for POTS, Centrex and PBX. Both PIDs are parity measures, meaning that Wholesale and Retail results are compared. MR-3 and MR-4 are measured by Dispatches within and outside MSA. PID results are posted on the following web site: www.qwest.com/wholesale/results. The results show parity with retail was met.

3. What is U S WEST's procedure for handling CLEC billing disputes? Who bears the burden of proving that charges are accurate?

Qwest publishes the following billing dispute resolution information in Section 5.4.4 of the Washington SGAT[24]:

> *5.4.4 Should CLEC or Qwest dispute, in good faith, any portion of the nonrecurring charges or monthly Billing under this Agreement, the Parties will notify each other in writing within fifteen (15) calendar Days following the payment Due Date identifying the amount, reason and rationale of such dispute. At a minimum, CLEC and Qwest shall pay all undisputed amounts due. Both CLEC and Qwest agree to expedite the investigation of any disputed amounts, promptly provide all documentation regarding the amount disputed that is reasonably requested by the other Party, and work in good faith in an effort to resolve and settle the dispute through informal means prior to initiating any other rights or remedies.*

[24] Washington SGAT, Fifth Revision, April 19, 2002 – accessible at: http://www.qwest.com/wholesale/clecs/negotiations.html

5.4.4.1 If a Party disputes charges and does not pay such charges by the payment Due Date, such charges may be subject to late payment charges. If the disputed charges have been withheld and the dispute is resolved in favor of the Billing Party, the withholding Party shall pay the disputed amount and applicable late payment charges no later than the second Bill Date following the resolution. If the disputed charges have been withheld and the dispute is resolved in favor of the disputing Party, the Billing Party shall credit the bill of the disputing Party for the amount of the disputed charges and any late payment charges that have been assessed no later than the second Bill Date after the resolution of the dispute. If a Party pays the disputed charges and the dispute is resolved in favor of the Billing Party, no further action is required.

5.4.4.2 If a Party pays the charges disputed at the time of payment or at any time thereafter pursuant to Section 5.4.4.3, and the dispute is resolved in favor of the disputing Party, the Billing Party shall, no later than the second Bill Date after the resolution of the dispute: (1) credit the disputing Party's bill for the disputed amount and any associated interest or (2) pay the remaining amount to CLEC, if the disputed amount is greater than the bill to be credited. The interest calculated on the disputed amounts will be the same rate as late payment charges. In no event, however, shall any late payment charges be assessed on any previously assessed late payment charges.

5.4.4.3 If a Party fails to dispute a charge and discovers an error on a bill it has paid after the period set forth in section 5.4.4, the Party may dispute the bill at a later time through an informal process, through an Audit pursuant to the Audit provision of this Agreement, through the Dispute Resolution provision of this Agreement, or applicable state statues or Commission rules.