QWEST CORPORATION

STATE: Washington

DOCKET NO: Docket No. UT-003022 and UT-003040

CASE DESCRIPTION: In the Matter of the Investigation into U S WEST's

Compliance with Section 271

INTERVENOR: Washington Bench REQUEST NO: BCH INF-07-052

## REQUEST:

What (if any) are the terms and conditions in the interconnection agreement between WCom and Qwest regarding testing on a pre-provisioning basis in connection with remote deployment of DSL.

## RESPONSE:

There is nothing in the Interconnection Agreements for either MCI Worldcom or Rhythms regarding the remote deployment of DSL. The Interim and Final Line Sharing Agreements did not address remote Line Sharing and/or remote deployment of DSL. Shared Distribution Loop is discussed as an amendment to the Interconnection Agreement. This amendment does not include any pre-provisioning tests. Neither Interconnection Agreement includes this amendment. Qwest does not perform pre-provisioning tests with CLECs when deploying Qwest DSL, nor is it required to do so. The CLECs were given the ability to be involved in the Joint Planning Meetings for Remote Collocation/Shared Distribution Loop in the fall of 2000 through the spring of 2001. Worldcom was represented at those meetings. These meeting discussed the architecture and equipment to be deployed by Qwest.

Respondent: Maryann Klasinski. Manager

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## REQUEST:

Provide any industry standards developed and agreed to regarding remote deployment of DSL. If none exists currently, provide any that may be agreed to in the future. Also, describe whether any industry tests are being conducted or are planned.

## RESPONSE:

Currently, there are no approved industry standards for remote deployment of DSL. National Reliability and Interoperability Council (NRIC) V Focus Group 3 (FG3) made its recommendation to the FCC, but the FCC has yet to decide on this recommendation. Issue 2 of the ANSI standard T1.417 is scheduled for completion this year. The current draft revision of Issue 2 includes the following new paragraph at 5.3 in the draft.

"The requirements in this clause are for applications where all DSL systems in a distribution cable are deployed from one site, either the Central Office (CO) or a Remote Terminal (RT) site. The deployment guidelines in this clause shall be applied from the CO or the RT whichever is appropriate."

While this standard is still in draft form and has not been approved, Qwest is in compliance with this paragraph. Even though there is an absence of approved industry standards specifically for remote deployment of DSL, Qwest has applied other standards it uses for Central Office based DSL. The equipment Qwest uses in its remote deployment meets NEBS standards for transmission equipment. The DSL equipment meets the Power Spectral Density (PSD) mask for Spectrum Management Class (SMC) 5. By placing the remote DSL beyond 15,500 feet, Qwest has adhered to the recommendation of NRIC V FG3 around Network Spectral Integrity. The splitter Qwest deploys is in compliance with ANSI standard T1.413.

Respondent: Maryann Klasinski, Manager