BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of Qwest Corporation for Arbitration with Eschelon Telecom, Inc. Pursuant to 47 U.S.C. Section 252 of the Federal Telecommunications Act of 1996

Docket No. UT-063061

EXHIBIT BJJ-23

ТО

REBUTTAL TESTIMONY OF

BONNIE J. JOHNSON

ON BEHALF OF ESCHELON TELECOM, INC.

DECEMBER 4, 2006

CHANGE REQUESTS RELATED TO LOSS AND COMPLETION REPORTS IN QWEST'S PRODUCT AND PROCESS, AND SYSTEMS CHANGE REQUEST <u>ARCHIVES</u>

<u>AT&T</u>

http://www.qwest.com/wholesale/cmp/archive/CR_SCR100101-1.htm

Title: Archive Loss and Completion Reports

SCR100101-1 Completed 3/22/2002

Description of change - Currently the loss and completion reports are not archived by Qwest. Once a CLEC accesses the report, it is no longer available from Qwest. CLECs have the ability to archive the reports once they are accessed, however, if the report is inappropriately accessed by an individual who is not aware of the CLEC archive process, the reports are no longer available from Qwest.

http://www.qwest.com/wholesale/cmp/archive/CR_SCR022703-12.htm

Title: Line Loss Notification - 836 EDI

SCR022703-12 Completed 3/18/2004

Description of change - CLEC would like to receive 836 EDI transactions to support Line Loss Notifications based on OC.

http://www.qwest.com/wholesale/cmp/archive/CR_SCR051304-01.htm

Title: Request for Line Loss Notification to notify CLECs if the customer was lost to a Wireless Carrier

SCR051304-01 Completed 6/2/2006

Description of change - AT&T requests that Qwest provide a Wireless Indicator on the Line Loss File as notification to CLECs in the event that the customer moves to Wireless Carrier. The Wireless Indicator should be provided on 836 transactions as well as on the Line Loss File.

Covad

http://www.qwest.com/wholesale/cmp/archive/CR_SCR061703-02.htm

Title: Line Loss Report for line and loop splitting

SCR061703-02 Withdrawn 9/18/2003

Description of change - Covad requests that Qwest provide line loss reporting for both Line and Loop Splitting. Covad also requests that the loss report be sent to both the CLEC of Record for the loop and the DLEC of record for the HFPL .

MCI

http://www.qwest.com/wholesale/cmp/archive/CR_SCR112702-02.htm

Title: Provide Loss and Completion Reported Information in EDI Format

SCR112702-02 Denied

3/14/2003

Description of change - Qwest currently sends Loss and Completion information via NDM. The request is to provide the same information but in EDI format.

VCI Company

http://www.qwest.com/wholesale/cmp/archive/CR_SCR111904-01.htm

Title: Request more information on Loss Reports

SCR111904-01 Denied

1/13/2005

Description of change - VCI would like to request that an RSID be provided on each Line Loss summary sent to VCI so we may see the Company we are losing our Customer to. Also that the date is accurate on the summary. In addition to that I would like to request that Loss Reports are generated real time. VCI has also been receiving a number of duplicate Loss summaries on several notices that are being sent.