

**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-26

TO

REBUTTAL TESTIMONY OF

BONNIE J. JOHNSON

ON BEHALF OF ESCHELON TELECOM, INC.

DECEMBER 4, 2006

Examples of Eschelon's Expedite Orders Approved By Qwest

Examples of Expedite Requests Approved by Qwest for Unbundled Loop Orders

| S T A T E | PON | LSR ID | Product | Reason Expedite Requested | Qwest Escalation Ticket Number | Date Completed |
|----------------------------------|---------------|---------------|-----------------------|--|---------------------------------------|-----------------------|
| AZ | AZ418942CJH | 11322965 | Analog Unbundled Loop | Customer requested | 25531379 | 7-26-04 |
| AZ | AZ409134CJH | 10933986 | Analog Unbundled Loop | Grand Opening | 25494268 | 6-22-04 |
| AZ | None | None | Analog Unbundled Loop | Qwest disconnect in error | 25363502 | 2-6-04 |
| AZ | CAZ5016941TIH | 14503578 | Analog Unbundled Loop | Eschelon disconnect in error | 25734876 | 5-11-05 |
| AZ | AZ467137RAK | 13049496 | Analog Unbundled Loop | Eschelon disconnect in error | 25663253 | 1-10-05 |
| AZ | AZ505525JW | 14591180 | Analog Unbundled Loop | Customer has no service at new location | 25742521 | 5-26-05 |
| CO | CO397124T1FAC | 10442493 | DS1 Capable Loop | Customer requested expedited contract expired with current carrier | 25456944 | 5-10-04 |
| CO | CO403624CJH | 10700495 | Analog Unbundled Loop | Customer request | 25480492 | 6-1-04 |
| CO | CO419695T1FAC | 12028645 | EEL | Qwest held order ready for service date did not meet customer's requirements | 25597104 | 10-11-04 |
| CO | None | None | Analog Unbundled Loop | Qwest disconnect in error | 25725153 | 4-2-05 |
| CO | CO588026T1FAC | 16091068 | DS1 Capable Loop | Fire | 25841849 | 11-11-05 |
| CO | CO618778T1FAC | 16752083 | EEL | Qwest held order ready for service date did not meet customer's requirements | 25882224 | 2-6-06 |

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|----|-----------------|----------|-----------------------|--|----------|----------|
| MN | MN510386T1FAC | 14872800 | DS1 Capable Loop | Qwest held order ready for service date did not meet customer's requirements | 25759318 | 7-6-05 |
| MN | MN452697T1FAC | 12425697 | DS1 Capable Loop | Qwest held order ready for service date did not meet customer's requirements | 25638663 | 12-2-04 |
| MN | MN432908T1FAC-1 | 11830617 | EEL | Qwest held order ready for service date did not meet customer's requirements | 25586372 | 9-28-04 |
| MN | MN410581LMM | 10996838 | Analog Unbundled Loop | Customer requested | 25504311 | 6-28-04 |
| MN | MN573604MVPSD | 15781085 | Analog Unbundled Loop | Customer will have no service at new location | 25826564 | 10-13-05 |
| MN | None | None | Analog Unbundled Loop | Qwest disconnect in error | 25635546 | 11-23-04 |
| OR | OR403180IBC | 10688799 | Analog Unbundled Loop | Customer requested | 25480006 | 5-28-04 |
| OR | OR403371IBC | 10694012 | Analog Unbundled Loop | Customer requested | 25479983 | 5-28-04 |
| OR | None | None | Analog Unbundled Loop | Qwest disconnect in error | 25621547 | 11-5-04 |
| UT | DUT242039-1RML | 8424781 | Analog Unbundled Loop | Eschelon disconnect in error | 25258869 | 10-20-03 |
| UT | UT406506CJH | 10823362 | Analog Unbundled Loop | Grand Opening | 25491265 | 6-14-04 |
| UT | UT404171CJH | 10727233 | Analog Unbundled Loop | Customer will have no service at new location | 25482524 | 6-4-04 |
| UT | UT406378CJH | 10820860 | Analog Unbundled Loop | Grand Opening | 25490996 | 6-16-04 |
| UT | None | None | Analog Unbundled Loop | Qwest disconnect in error | 25804848 | 8-30-05 |
| WA | WA303487RML | 8412382 | Analog Unbundled Loop | Eschelon disconnect in error | 25258476 | 10-21-03 |
| WA | WA419298CJH | 11336326 | Analog Unbundled Loop | Customer will have no service at new location | 25532556 | 7-27-04 |

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|----|-----------------|----------|-----------------------|---|----------|----------|
| WA | WA405774CJH | 10798940 | Analog Unbundled Loop | Customer will have no service at new location | 25488662 | 6-10-04 |
| WA | WA5045671MLS | 10755567 | Analog Unbundled Loop | Eschelon disconnect in error | 25485579 | 6-3-04 |
| WA | WA409481TIFAC-1 | 11223088 | DS1 Capable Loop | Customer will have no service at new location | 25526529 | 7-23-04 |
| WA | WA573785MVMJW | 16094411 | Analog Unbundled Loop | T1 Circuit Qwest installed was not working expedited temporary analog service | 25855519 | 12-8-05 |
| WA | None | None | Analog Unbundled Loop | Qwest disconnect in error | 25838375 | 10-31-05 |
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October 19, 2005 Expedites PCAT Version 30 Announcement



Announcement Date: October 19, 2005
Proposed Effective Date: January 3, 2006
Document Number: PROS.10.19.05.F.03380.ExpeditesEscalationsV30
Notification Category: Process Notification
Target Audience: CLECs, Resellers
Subject: CMP - Expedites and Escalations V30
Level of Change: Level 3

Summary of Change:

On October 19, 2005, Qwest will post planned updates to its Wholesale Product Catalog that include new/revised documentation for Expedites and Escalations V30. These will be posted to the Qwest Wholesale Document Review Site located at <http://www.qwest.com/wholesale/cmp/review.html>.

Qwest is changing its Expedite process to require an expedite amendment to be signed for expedited requests that involve products that follow the designed services flow in order to bring parity across its entire customer base. Qwest recognizes that time is required for some customers to get amendments signed and is therefore extending the implementation of the Level 3 process change beyond the allotted 45 day time frame.

Current operational documentation for this product or business procedure is found on the Qwest Wholesale Web Site at this URL: <http://www.qwest.com/wholesale/clecs/exesclover.html>.

Comment Cycle:

CLEC customers are encouraged to review these proposed changes and provide comment at any time during the 15-day comment review period. Qwest will have up to 15 days following the close of the comment review to respond to any CLEC comments. This response will be included as part of the final notification. Qwest will not implement the change sooner than 15 days following the final notification.

Qwest provides an electronic means for CLEC customers to comment on proposed changes. The Document Review Web Site provides a list of all documents that are in the review stage, the process for CLECs to use to comment on documents, the submit comment link, and links to current documentation and past review documents. The Document Review Web Site is found at <http://www.qwest.com/wholesale/cmp/review.html>. Fill in all required fields and be sure to reference the Notification Number listed above.

Timeline:

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| Planned Updates Posted to Document Review Site | Available October 19, 2005 |
| CLEC Comment Cycle on Documentation Begins | Beginning October 20, 2005 |
| CLEC Comment Cycle Ends | 5:00 PM, MT November 03, 2005 |

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| Qwest Response to CLEC Comments (if applicable) | Available November 18, 2005 http://www.qwest.com/wholesale/cmp/review_archive.html |
| Proposed Effective Date | January 3, 2006 |

If you have any questions on this subject, please submit comments through the following link:
<http://www.qwest.com/wholesale/cmp/comment.html>.

Sincerely

Qwest Corporation

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

If you would like to unsubscribe to mailouts please go to the "Subscribe/Unsubscribe" web site and follow the unsubscribe instructions. The site is located at:

<http://www.qwest.com/wholesale/notices/cnla/maillist.html>

**Qwest November 18, 2005 Response to CLECs Questions Regarding
Version 30**

Qwest Response to Document In Review

Response Date: November 18, 2005
Document: Process: Expedites and Escalations V30
Original Notification Date: October 19, 2005
Notification Number: PROS.10.19.05.F.03380.ExpeditesEscalationsV30
Category of Change: Level 3

Qwest recently posted proposed updates to Expedites and Escalations V30. CLECs were invited to provide comments to these proposed changes during a Document Review period from October 20, 2005 through November 3, 2005. The information listed below is Qwest's Response to CLEC comments provided during the review/comment cycle.

Resources:

Customer Notice Archive <http://www.qwest.com/wholesale/cnla/>
Document Review Site <http://www.qwest.com/wholesale/cmp/review.html>

If you have any questions on this subject or there are further details required, please contact Qwest's Change Management Manager at cmpcomm@qwest.com.

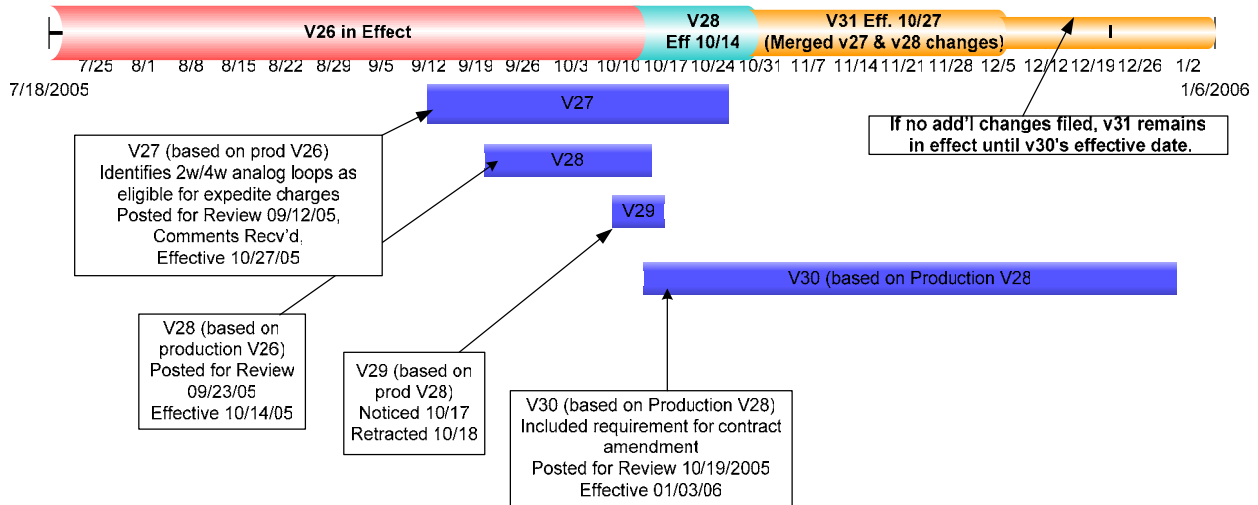
Qwest Response to Product/Process Expedites and Escalations V30 Comments

As a course of doing documentation updates, it is not unusual for multiple changes to be in process at any given time. These changes may or may not ultimately be implemented. Therefore, CMP standard practice is to base the proposed changes on the current production Version, not a Version that is in process. It appears that this practice led to the submittal of comments by the CLECs during the V30 comment cycle that actually addressed changes made in V27 of this document.

The picture below provides a timeline of the changes that have been made to this document. Version 27 of the document included the change to make 2w/4w analog loops eligible for expedite payments. That change was not commented on (other than a clarifying question on the rate) during the comment cycle and became effective on 10/27/05. Because Version 28 had already become effective, Version 31 was issued -- and merged the Version 27 changes with the Version 28 changes.

Meanwhile Version 30, which added language requiring an amendment to address expedites, had been created. Because Version 30 was created before Version 27 had taken effect, it did not include the Version 27 language per CMP practice. The Version 30 changes will be incorporated into the version that is in production on 1/3/06.

Several of the comments received on the Version 30 document actually address changes that were made in Version 27. Qwest will not respond to the comments which address Version 27 changes but will respond to comments related to the Version 30 amendment language.



| # | Page/Section | CLEC Comment | Qwest Response |
|---|--------------|--|---|
| 1 | | <p><i>McCloud</i> 10/26/05 Comment: Qwest announced it will begin charging expedite fee for 2w/4w loops on Oct. 27th. Qwest just posted a Expedites and Escalations V30 which still has the 2w/4w analog loop exception included. I looked at the previous version (V29) and the exception was also present in that version. Qwest has given until November 3rd to comment on the V30 so I don't see how (1) Qwest can begin charging tomorrow (Oct. 27th) when the review isn't complete and (2) Qwest can even claim that 2w/4w analog loops are no longer an exception in the Pre-Approved Expedite process when it doesn't appear that Qwest has addressed this issue in prior reviews</p> | <p>The change referenced in this comment was included in Version 27 which is already in effect.</p> |
| 2 | | <p><i>McCloud</i> 11/1/05 Comment:</p> | <p>There is no condition being removed in the Version 30 change. The change referenced in this comment was included in Version 27</p> |

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| | | <p>Can you please clarify which condition is being removed where an expedite is granted? Also, I see under the "Pre-Approved Expedites" section that the first product listed is "UBL all except 2W/4W analog".</p> <p>Does this mean that we are going to have this as an exception starting with V30 going forward? I don't see this listed in the history log as something that is being added back into the document as an exception. Please advise. Thank you.</p> | <p>which is already in effect.</p> <p>V30 is changing the process to require expedite language in the customers Interconnection Agreement (ICA) when an expedite is requested for products that follow the designed services flow. Products that follow the designed services flow will not be part of the Expedite Requiring Approval process except in the state of Washington.</p> |
| 3 | | <p><i>Eschelon</i> 11-3-05 Comment: In Qwest's response to Covad's CR PC021904-1, Qwest said: "If a CLEC chooses not to amend their Interconnection Agreement, the current expedite criteria and process will be used." The current "expedite requiring approval process" allows a CLEC to request an expedite, at no charge, when the customer's needs met certain criteria. Eschelon relied upon Qwest's response and based its decision to comment, or not comment, on that response. Qwest is now failing to keep the commitments it made to CLECs in CMP, and in its response to Covad, by now changing its position on expedites and unilaterally imposing charges via a process change in CMP. Qwest's proposed change to remove the existing approval required expedite process for designed products will negatively impact Eschelon and its</p> | <p>In regards to Eschelon's comments regarding Qwest's commitments with PC021904-1, discrimination allegations and timing of process notifications, Qwest submits the following response:</p> <p>Qwest did meet its commitment to PC021904-1. As with all processes that exist, they do change over time. Qwest utilized the appropriate CMP notification processes to notify CLECs of the pending changes. In fact, with this particular PCAT, process changes have been implemented since PC021904-1 was closed. For example, Qwest changed the process when it bills expedite charges in the following situations: billing per ASR/LSR instead of per service order, bill expedite charges on delayed orders only when additional costs are incurred, and finally, changed the pre-approved expedite process to include port in/port within.</p> <p>Qwest does not sell Unbundled Loops to its end user customers so it is not appropriate to make a comparison to retail in this situation. Qwest is selling a pipe, not a switched POTS service. The DS0 UBL product can be used for services other than a POTS type service and Qwest does not know what service the CLEC is providing its end user with the DS0 pipe. Therefore, Qwest's position is that there is not the parity component that is being raised with this comment.</p> |

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| | <p>customers. Qwest said its basis for this change is “parity” and that Qwest retail charges for all expedites for “designed” services. However, this claim of “parity” is misleading as Qwest’s new process now treats CLEC POTS customers differently than Qwest POTS customers. Qwest defines parity based on whether a service is “designed.” Qwest has chosen to apply the “design” process to DS0 UBLs, but not to its own POTS customers. The result is that though from the customer perspective the service is the same, Qwest now proposes to treat them differently for the expedite process. The change Qwest is proposing is discriminatory to CLECs and their customers. A CLEC DS0 UBL and a Qwest retail 1FB functionally are the same service. A DS0 loop is merely a POTS line that Qwest choose to provision using a design flow process. For example, a customer could request an expedite using the approval required process when ordering service from Qwest (e.g. a 1FB), and would not have to pay additional charges for the expedite. However, if the customer orders service from a CLEC via a DS0 loop and the customer requests an expedite from the CLEC, the CLEC and the customer would have to pay an additional charge for the same basic service.</p> <p>Eschelon objects to Qwest’s proposed changes to the current approval required</p> | <p>Finally, Qwest did choose to implement the changes on different process notices. This was done to allow the CLEC community ample time to get the expedite amendments through the implementation process, which is longer than the CMP Level 3 notification requirements. For each of the process changes that were made on this process since PC021904-1 completed, Qwest stated clearly in the notification the process change that was being made in each of the notifications.</p> |
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| | | <p>expedite process because it is discriminatory to CLECs and CLEC customers. In addition, because Eschelon relied upon Qwest's comments to Covad's CR, Eschelon also objects to Qwest's addition of UBL DSO products to the pre-approved list of products. Qwest chose to make the change to the approval required expedite process after it added DSO loops to the product list for pre-approved products. The result is that CLECs were unable to effectively comment on a change that now, coupled with Qwest's further change, significantly impacts a CLEC's business.</p> | |
| 4 | | <p><i>McCloud</i> 11-3-05 Comment: Qwest's removal of the 2w/4w analog loop exception from the Expedites Requiring Approval process places CLECs at a competitive disadvantage because it forces expedite charges upon the end user consumer only when that end user consumer is purchasing from a facilities based CLEC. These expedite charges are not applicable if the end user consumer is purchasing from Qwest or a non-facilities based provider.</p> | <p>The change referenced in this comment was included in Version 27 which is already in effect.</p> |
| 5 | | <p><i>PriorityOne</i> 11-3-05 Comment: PriorityOne Telecommunications, Inc. objects to Qwest's proposed changes due to feeling that it is discriminatory to CLEC's and CLEC customers. Adding UBL DSO to the list of products is</p> | <p>The change referenced in this comment was included in Version 27 which is already in effect.</p> <p>Qwest has noted PriorityOne's objection to the process change associated with V30. The process change associated with V30 is being made to create consistencies across Qwest's entire customer base for products that follow the Designed Services flow.</p> |

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| | | <p>not “parity” as the customer’s perception is that they are requesting a “line”. The end user does not know whether the line is POTs or UBL DSO. They just know that it’s a line.</p> <p>Also, PriorityOne objects to Qwest’s proposed change to remove the existing approval required expedite process for designed products and note that it will negatively impact PriorityOne and its customers.</p> | |
| 6 | | <p><i>Covad</i> 11-3-05 Comment: Regarding Qwest’s proposed change to remove the existing approval required expedite process for designed products, Covad requests clarification regarding availability of expedited services in the state of Washington, where, currently, Qwest does not offer an expedited services amendment. Covad requests that Qwest reiterate that the Expedites Requiring Approval products will still be available in the State of Washington.</p> | <p>Qwest has reiterated that the Expedites Requiring Approval process will still be available in the state of WA in the V30 redline document. Qwest currently has the following two statements addressing the state of Washington:</p> <p><i>The Expedites Requiring Approval section of this procedure does not apply to any of the products listed below (unless you are ordering services in the state of WA).</i></p> <p><i>The Pre-Approved expedite process is available in all states except Washington for the products listed below when your ICA contains language for expedites with an associated per day expedite charge.</i></p> |
| 7 | | <p><i>Integra</i> 11-3-05 Comment: Integra objects to Qwest proposed change to remove the existing approval required expedite process for designed products. When Integra signed the Qwest Expedite Amendment we were not advised that by signing the amendment it would change the current Expedites Requiring</p> | <p>Integra was not advised that by signing the amendment it would change the Expedites Requiring Approval Process for a couple of reasons:</p> <p>1) When an expedite amendment is signed, the CLEC is automatically included in the pre-approved process and the Expedite Requiring Approval process is not applicable any longer for the products identified in the Pre-Approved Expedite section of the PCAT. This was clarified and documented with PC021904-1. In the meeting minutes for the ad-hoc meeting held on July 9, 2004, Qwest</p> |

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| | | <p>Approval process. We signed the amendment believing that this would ADD to our options of having an order completed outside the standard interval. When Integra signed the amendment UBL DS0 loops were not included as a product on the list of products in the "Pre-Approved Expedites" list. When the UBL DS0 was added to this list Integra did not comment as at that time we still believed the Expedites Requiring Approval process was in place for our use.</p> | <p>clarified that when a CLEC amends their contract there are no reasons any longer and that if Qwest expedites a request, expedite charges apply.</p> <p>2) The PCAT that was revised with PC021904-01 states the following:</p> <p><i>Requesting an expedite follows one of two processes, depending on the product being requested and the language in your Interconnection Agreement (ICA). If the request being expedited is for a product on the list of products in the "Pre-Approved Expedites" (see below) and your ICA has language supporting expedited requests with a "per day" expedite rate, then the request does not need approval. If the request being expedited is for a product that is not on the defined list, or your ICA does not support a "per day" expedite rate, then the expedited request follows the process defined in the "Expedites Requiring Approval" section below.</i></p> <p>For the change that is being implemented with V30, there is no change to the CLECs that already have an expedite amendment in place.</p> |
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**Qwest May 6, 2003 Response to AT&T Comments on Expedites PCAT
Version 6**

Qwest Response to Document In Review

Response Date: May 20, 2003
Document: Product/Process: Expedites & Escalations Overview V6.0
Original Notification Date: May 6, 2003
Notification Number: PROS.05.06.03.F.01079.Expedite_Escalation
Category of Change: Level 2

Qwest recently posted proposed updates to Expedites & Escalations Overview V6.0. CLECs were invited to provide comments to these proposed changes during a Document Review period from May 7, 2003 through May 13, 2003. The information listed below is Qwest's Response to CLEC comments provided during the review/comment cycle.

Resources:

Customer Notice Archive http://www.qwest.com/wholesale/cmp/review_archive.html
 Document Review Site <http://www.qwest.com/wholesale/cmp/review.html>

If you have any questions on this subject or there are further details required, please contact Qwest's Change Management Manager at cmpcomm@qwest.com.

Qwest Response to Product/Process: Expedites & Escalations Overview V6.0 Comments

| # | Page/Section | CLEC Comment | Qwest Response |
|---|--------------|---|---|
| 1 | | <i>Name of CLEC:AT&T Date received: 5/6/03 Comment: Please update the ordering rules in the Disclosure Documents as well. AT&T has been instructed to place the expedite situation (such as Medical Expedite) in the remarks field and set the manual indicator to "Y". As May 6, the LSR EXP field in the IMA EDI disclosure states: If EXP + "Y", the MANUAL IND should = "N".</i> | <p>The current process for Expedites will not change. "Medical emergency" is a valid Expedite reason that was not previously documented. The PCAT updates were clarifying updates only in order to provide an additional valid reason to request an expedite.</p> <p>Placing a "Y" in the EXP field of the Local Service (LSR) forces the order to be handled manually. It is not necessary to place a "Y" in the Manual Indicator field. The REMARKS field can be used to expand upon and clarify the specific reason for the request.</p> <p>The PCAT is being updated to clarify the actions for Expedite situations.</p> <p>Qwest accepts this comment.</p> |
| 2 | | <i>Name of CLEC:AT&T Date received: 5/12/03</i> | <p>Based on the comments received, the PCAT updates were clarifying updates only in order to</p> |

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

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| | | <p>Comment: AT&T is not satisfied with this change to the maintenance and repair language. AT&T requested a CR to document the medical expedite process. This document still does not document that process. If the specifics for the ordering process should be contained in another document, i.e. the EDI disclosure document, then there should be a direct reference and link to that site. We have had several meetings with Qwest to outline the specifics of the medical expedite process, and none of that information is contained in this PCAT, not the disclosure document for EDI, not other PCATs for ordering and provisioning. It has taken AT&T approximately 5 and a half months to get the information we have been requesting, and still it is not documented.</p> | <p>provide additional information.</p> <p>The current process for Expedites will not change. "Medical emergency" is a valid Expedite reason that was not previously documented.</p> <p>The PCAT is being updated to clarify the actions for Expedite situations along with a link to the field entry requirements in the Local Service Ordering Guide (LSOG).</p> <p>Qwest accepts this comment.</p> |
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AT&T February 27, 2003 Change Request On Expedites

Resources

Change Management Process (CMP)**Open Product/Process CR PC022703-3 Detail****Title:** Request for Medical Expedite Process

| CR Number | Current Status Date | Area Impacted | Products Impacted |
|-------------------|--------------------------------|--|--------------------------|
| PC022703-3 | Completed 2/27/2003 | Pre-Order, Ordering, Provisioning, Maint. & Rep | UNE-P |

Originator: Pardee, Carla**Originator Company Name:** AT&T**Owner:** Sunins, Phyllis**Director:** Burson, Sue**CR PM:** White, Matt**Description Of Change**

Currently, Qwest does not provide a process for expediting service requests for medical purposes, see Qwest website at <http://www.qwest.com/wholesale/clecs/execscover.html/>. The requested process would allow a CLEC to request service expedites when an end user has a medial condition that would require telephone service due to the probability of a medical emergency. This process would greatly benefit all CLECs and end users in need. AT&T does not believe providing this process would require an expensive development process by Qwest. This process is provided in all other ILEC regions nationwide.

Expected Deliverable:

May 2003

Status History

02/27/03 - CR Submitted by ATT

02/28/03 - CR acknowledged by P/P CMP Manager

03/14/03 - Clarification Meeting

03/19/03 - CR Presented at CMP Meeting

04/09/03 - Initial Response sent

04/16/03 - Qwest initial response presented at CMP Meeting

05/21/03 - Discussed at CMP Meeting

06/18/03 - Discussed at CMP Meeting

07/16/03 - CR Discussed at CMP Monthly Meeting

Project Meetings

CMP Meeting 07-16-03

Pardee-AT&T stated that the CR could be closed.

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Meeting 06-18-03

Sunins-Qwest stated that the change was implemented on 6/5. She asked that it moved to CLEC Test. Pardee-AT&T agreed.

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CMP Meeting 05-21-03

White-Qwest stated that the response to comments was sent 5/20. He recommen the CR in Development until the CLECs had an opportunity to review the final doc
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04-16-03 - CMP Meeting

Sunins-Qwest presented the response. She stated Qwest already had a process in that it was not yet documented externally. She explained that Qwest would repor progress of documenting the policy at the May CMP Meeting. Pardee-AT&T asked externally undocumented process was. Sunins-Qwest stated that she would verify requirements. (In an e-mail on April 22, Sunins-Qwest communicated to Pardee-, on the LSR, there needed to be a "Y" in the EXP field, the LSR needed to be mark manual, and the Remarks need to be populated with "Medical Emergency.") The moved into development status.

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03-19-03 CMP Meeting

Pardee-AT&T presented the CR. White-Qwest asked if there were other CLECs wh interested in expanding this CR to products other than UNE-P. Prull-McLeod state would like to see it expanded to all resale products. Johnson-Eschelon stated that like to see it expanded to all unbundled products. Sechser-US Link asked if there Qwest department where CLECs can register emergency numbers that would aut receive priority if there were maintenance and repair orders opened for them. Wf stated that he would find out.

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Clarification Meeting 10:00 AM (Mountain Time) / Friday, March 14, 2003

1-877-550-8686 2213337#

Attendees Matt White – CRPM Phyllis Sunnis – Qwest Michael Whitt – Qwest Joy Couch – Qwest Carla Pardee – AT&T Kevin Battin – AT&T

Introduction of Attendees White-Qwest welcomed all attendees and reviewed the

Review Requested (Description of) Change Pardee-AT&T reviewed the description Battin-AT&T stated that Qwest has expedite reasons, but they are directed at bus customers. He stated that AT&T needed this option for consumers with medical c He stated that AT&T understands that is not currently available through Qwest.

Sunins-Qwest asked if the only product AT&T was requesting this service for was Pardee-AT&T stated that UNE-P is only one that AT&T was looking for, but she fel CLECs would probably request this for additional products at the CMP Meeting.

Confirm Areas and Products Impacted White-Qwest confirmed that the attendees comfortable that the request appropriately identified all areas and products impac Confirm Right Personnel Involved White-Qwest confirmed with the attendees that appropriate Qwest personnel were involved.

Identify/Confirm CLEC's Expectation White-Qwest reviewed the request to confir expectation. Pardee-AT&T stated that the other ILECs around the country have a similar to the one AT&T is requesting.

Identify and Dependant Systems Change Requests White-Qwest asked the attentc knew of any related change requests.

Establish Action Plan White-Qwest asked attendees if there were any further ques were none. White-Qwest stated that the next step was for AT&T to present the Cl March Monthly Product/Process Meeting and thanked all attendees for attending t

QWEST Response

April 9, 2003

INITIAL RESPONSE For Review by CLEC Community and Discussion at the April 16, 2003, CMP Product/Process Meeting

Carla Pardee AT&T

SUBJECT: Qwest's Change Request Response - CR #PC022703-3

This memo is in response to AT&T CR PC022703-3. This CR requests a Medical Expedite Process for all resale products. Qwest Response: Accepted

Qwest currently allows CLECs to request medical expedites for both designed (Complex/Resale, Unbundled, etc.) and non-designed products offered by Qwest Interconnection services.

The "medical" expedite reason is not currently contained in external documentation. Qwest is researching the appropriate manner in which to communicate this additional expedite reason and will update the CMP community on the progress of this research at the May 2003 CMP Meeting.

Sincerely, Phyllis Sunins Sr Process

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Information Current as of 11/27/2006

SEPTEMBER 20, 2001 PRODUCT NOTIFICATION

PROD.09.20.01.F.00087.F.BFR SR. POA LOA. EXPEDITES

Announcement Date: September 20, 2001
Effective Date: Immediately

Document Number: PROD.09.20.01.F.00087.F.BFR SR. POA LOA. Expedites
Notification Category: Product Notification
Target Audience: CLECs

Subject: Updates to Product Catalog for Bona Fide Request and Special Request, Expedites and Escalations, Proof of Agency and Letter of Agency

TO:

Beginning September 22, 2001, Qwest will issue updates to its Wholesale Product Catalog on methods and procedures for Bona Fide Request (BFR) and Special Request (SR) Processes, Expedites and Escalations, and Proof of Agency (POA) and Letter of Authority (LOA.)

Qwest has enhanced sections of its Business Procedures site to provide a more efficient means for CLECs to obtain procedural information. You will find a summary of these updates on the attached Web Change Notification Forms. You will also find these procedural updates within the Qwest Wholesale Web Site at these locations:

- BFR SR <http://www.qwest.com/wholesale/preorder/bfrsrprocess.html>
- Expedites & Escalations <http://www.qwest.com/wholesale/clecs/exesclover.html>.
- POA/LOA <http://www.qwest.com/wholesale/preorder/index.html>

Some modifications were made based on changes to the Statement of Generally Accepted Terms and Conditions (SGAT). You will find the SGAT documents at: <http://www.qwest.com/about/policy/sgats/>.

You are encouraged to provide feedback to this notice through our web site. We provide an easy to use feedback form at <http://www.qwest.com/wholesale/feedback.html>. A Qwest representative will contact you shortly to discuss your suggestion.

Sincerely,

Qwest

Note: While these updates reflect current practice, it is important to note that there are additional changes that will be forthcoming as a result of ongoing regulatory activities e.g., collaborative workshops and state commission orders. As these changes are defined and implementation dates are determined, notice of additional updates will be provided accordingly.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

WEB CHANGE NOTIFICATION FORM:

Attention: Changes have been made to the Qwest Wholesale Markets Web Page URL
<http://www.qwest.com/wholesale/>

Product(s) Affected: Bona Fide Request (BFR) and Special Request (SR) Processes

Effective Date: September 21, 2001

The new Bona Fide Request (BFR) and Special Request (SR) Processes Product Catalog will be posted to the Wholesale Markets Web page at the following URL:

<http://www.qwest.com/wholesale/preorder/bfrsrprocess.html>.

If you do not see the following updates, hit the reload button on your Netscape Navigator, or refresh under view within Internet Explorer.

All updates are consistent with the information available in the Statement of Generally Available Terms (SGAT) URL <http://www.qwest.com/about/policy/sgats/>

| Section | Sub Section | UPDATE / ACTIVITY |
|-----------------------|--------------|--|
| All Sections | | <ul style="list-style-type: none"> The PCAT has been updated to reflect enhanced description and process information. |
| Product Description | | <ul style="list-style-type: none"> The Bona Fide Request (BFR) and Special Request (SR) Processes PCAT has been updated to clarify information about the process. |
| Terms and Conditions | | <ul style="list-style-type: none"> Provides information on when the BFR and SR processes should be used. |
| Pricing | Rates | <ul style="list-style-type: none"> Hyperlinks to the SGAT established. |
| Features/ Benefits | | <ul style="list-style-type: none"> Explains the benefit derived from process use. |
| Implementation | Pre-Ordering | <ul style="list-style-type: none"> Identifies the requirements associated with the BFR process, hyperlink established to the BFR Application form. Identifies the requirements associated with the SR process, hyperlink established to the SR Application form. |
| Implementation | Ordering | <ul style="list-style-type: none"> The ordering process is explained. |
| Implementation | Provisioning | <ul style="list-style-type: none"> Processing intervals are addressed in the SGAT, hyperlinks to the SGAT established. |
| Billing | | <ul style="list-style-type: none"> Identified the Billing system used and hyperlinks to the Billing and Receivable Tracking (BART) web page. |
| Training | | <ul style="list-style-type: none"> Applicable training courses available to the CLEC. |
| Contacts | | <ul style="list-style-type: none"> Hyperlink established to the CLEC and Reseller Center Contacts web page. |

WEB CHANGE NOTIFICATION FORM:

Attention: Changes have been made to the Qwest's Wholesale Markets Web Page
 URL <http://www.qwest.com/wholesale/>

Product(s) Affected: All Wholesale Products and Services

Effective Date: September 21, 2001

The new Expedite and Escalation Overview will be posted to the Wholesale Markets Web page at the following URL: <http://www.qwest.com/wholesale/clecs/exesclover.html>.

If you do not see the following updates, hit the reload button on your Netscape Navigator, or refresh under view within Internet Explorer.

All updates are consistent with the information available in the Statement of Generally Available Terms (SGAT) URL <http://www.qwest.com/about/policy/sgats/>

| Section | Sub Section | UPDATE / ACTIVITY |
|---------------------|--------------------------------------|--|
| Product Description | Introduction | Improve communications with Wholesale customers doing business with Qwest providing them an overview of how to interface with Qwest for Expedites and Escalations. |
| Introduction | Expedites | Defines an expedite as a request for an improved standard interval, Individual Case Basis (ICB) or committed to ICB (Ready for Service (RFS) + Interval) date, outlines Qwest's expedite process explaining that internal approval is required, to ensure resource availability, the valid expedite reasons and who to contact if an expedite situation occurs. |
| Introduction | Escalations | Defines an escalation is a request for status or intervention around a missed critical date. Explains Qwest pro-actively escalates critical dates in jeopardy and who to contact for an escalation, if our Wholesale customers find it necessary to initiate an escalation. Summarizes Qwest's escalation flow, from Service Delivery Coordinator to Senior Director/Vice President level, to resolve an escalation. |
| Escalations | Escalations - Maintenance and Repair | Links Wholesale customers to Maintenance and Repair web page providing an overview of Qwest's Maintenance and Repair process flow. |
| Contacts | | Identifies contact phone numbers for LSR and ASR expedites and escalations as well as Maintenance and Repair. |

WEB CHANGE NOTIFICATION FORM:

Attention: Changes have been made to the Qwest's Wholesale Markets Web Page
 URL <http://www.qwest.com/wholesale/>

Product(s) Affected: All Wholesale Products and Services

Effective Date: September 21, 2001

The new Proof of Authorization / Letter of Agency Overview will be posted to the Wholesale Markets Web page at the following URL <http://www.qwest.com/wholesale/preorder/index.html>

If you do not see the following updates, hit the reload button on your Netscape Navigator, or refresh under view within Internet Explorer.

All updates are consistent with the information available in the Statement of Generally Available Terms (SGAT) URL <http://www.qwest.com/about/policy/sgats/>

| Section | Sub Section | UPDATE / ACTIVITY |
|---------------------|-------------|---|
| Product Description | | Enhance description of Proof of Authorization (POA) / Letter of Agency (LOA) combining requirements and impact to improve communication with Wholesale customers doing business with Qwest. |
| Product Description | | Defines methods for obtaining a Letter of Agency, also called a Letter of Authorization (LOA) and contents required within the LOA document. |
| Product Description | | Provides examples of an end-user and a CLEC to CLEC LOA. |
| Product Description | | Outlines POA requirements and impact should a conflict exist between end-user's designation and CLEC/Reseller's written evidence. Qwest honors end-user's designated, changing them back to previous provider and, if applicable, charging the CLEC/Reseller a Customer Transfer Charge slamming fee. |
| Product Description | | Explains Qwest follows these same POA/LOA requirements with the same impacts. |