

**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-31

TO

REBUTTAL TESTIMONY OF

BONNIE J. JOHNSON

ON BEHALF OF ESCHELON TELECOM, INC.

DECEMBER 4, 2006

**CHANGE REQUESTS RELATED TO PENDING SERVICE ORDER NOTICES
(PSON) IN QWEST'S PRODUCT AND PROCESS, AND SYSTEMS CHANGE
REQUEST ARCHIVES**

McLeod

http://www.qwest.com/wholesale/cmp/archive/CR_5466535.htm

CR 5466535 **Withdrawn**

1/17/2002

Title: More detailed FOC

Description of Change:

We would like to receive a more detailed FOC on all resale orders to include the following: 1) USOCs, 2) FIDs, 3) How the hunting sequence is set up once the Qwest order is typed, listing the numbers in the order of the hunt sequence. 4) When applicable, what is the call forwarding number on the order? 3) LPIC and PIC. 4) Verify if a voice mailbox exists on the order. McLeod has experienced a huge number of Qwest typist errors. When Qwest receives an order from McLeod, Qwest has the ability to reject the order based on errors. McLeod wants the capability to ensure our order has been typed the way we wrote it. This would be possible through a more detailed FOC.

Eschelon Telecom, Inc.

http://www.qwest.com/wholesale/cmp/archive/CR_SCR073001-2.htm

SCR073001-2 **Withdrawn**

9/14/2001

Title: Complete service order detail on FOCs for Resale & UNE-P

Description of Change:

When a CLEC sends an LSR with detail, such as feature changes, the CLEC receives a FOC with order number and due date, but no detail regarding what was ordered. If the CLEC received complete service order detail, the CLEC could identify discrepancies between the FOC and the LSR. For example, a clerical error could have occurred that changes the information ordered. Because such detail is not on the FOC, these issues are not discovered until the time of cut. Therefore, the problem becomes a customer affecting issue when it could have been avoided altogether.

Previously, McLeod made a similar request in CR#5466535. That CR, however, does not appear on the last CICMP log. If that CR remains active, Eschelon does not object to consolidating this CR with that one

Eschelon Telecom, Inc.

http://www.qwest.com/wholesale/cmp/archive/CR_SCR073001-5.htm

SCR073001-5 **Withdrawn**

8/15/2001

Title: Complete service order detail on FOCs

Description of Change:

When a CLEC sends an LSR with detail, such as feature changes, the CLEC receives a FOC with information requested on the LSR, but no detail regarding what was typed. If the CLEC received complete service order detail, the CLEC could identify discrepancies between the FOC and what was actually typed on the service order. For example, a clerical error could have occurred that changes the information ordered. Because such detail is not on the FOC, these issues are not discovered until the time of cut. Therefore, the problem becomes a customer affecting issue when it could have been avoided altogether.

Qwest

http://www.qwest.com/wholesale/cmp/archive/CR_25497.htm

CR 25497 Completed

9/19/2002

Title: Provide Pending Service Order S&E to CLECs [Include summary USOC(s) in FOC]

Description of Change:

Providers are requesting a summary of the order by USOC to be included with the FOC so that errors can be identified and corrected before the order completes.

AT&T

http://www.qwest.com/wholesale/cmp/archive/CR_SCR041202-01.htm

SCR041202-01 Completed

4/17/2003

Title: Add APP Date to Pending Service Order Notice (PSON)

Description of Change:

A system change which would include the APP date on PSON.

Application Date is defined as: The date (and time) on which Qwest receives from the CLEC a complete and accurate local service request (LSR) or access service request (ASR) or retail order, subject to the following:

· For the following types of requests/orders, the application date (and time) is the start of the next business day:

(1) LSRs and ASRs received after 3:00PM MT for Designed Services

(2) Retail orders received after 3:00 PM local time for Designed

Services.

(3) LSRs received after 7:00PM MT for POTS Resale (Residence and Business), Non-Design Resale Centrex, non-designed UNE-P, Unbundled Loops, LNP.

Retail orders for comparable non-designed services cannot be received after closing time, so the cutoff time is essentially the business office closing time.

Eschelon Telecom, Inc.

http://www.qwest.com/wholesale/cmp/archive/CR_SCR093002-04.htm

SCR093002-04 Completed

2/17/2005

Title: Update PSON to include all service order information including listing, billing and service address

Description of Change:

Currently the PSON contains only the S&E (service and equipment) section of the Qwest service order. The sections of the service order omitted from the PSON contain valuable information for a CLEC which includes, billing, the customer address and listing information. In an effort to ensure this information is correct on the Qwest service order, the PSON will need to include the information. If the information is not included and there is an error on the service order somewhere other than the S&E section, this can have a negative impact to a CLEC's customer up to and including OOS conditions.

Eschelon Telecom, Inc.

http://www.qwest.com/wholesale/cmp/archive/CR_SCR012203-01.htm

SCR012203-01 Withdrawn

11/14/2006

Title: PSON sent after the service order is in a ready to be worked status

Description of Change:

CLECs have attempted different approaches to address the problem of mismatches between the order placed by the CLECs on an LSR and the order typed by Qwest on the Qwest service orders. When the Qwest service order is incorrect, customer-affecting problems can result. One approach has been to request a document showing the information on the Qwest service order so that CLECs can compare that information to the LSR to attempt to identify and correct errors before the due date. In other words, CLECs requested the service order detail to identify service order accuracy issues. While CLECs do not believe they should bear the burden of identifying these errors, the alternative of allowing customer-affecting errors on the due date is even worse. Qwest calls the document reflecting the service order detail a Pending Service Order Notification (PSON). CLECs were clear about the need to be addressed when requesting the PSON information. In CR 25497, for example, CLECs said: Providers are requesting a summary of the order by USOC to be included with the FOC so that errors can be identified and corrected before the order completes. Because Qwest said it completed the CR and closed it, CLECs understood that the request had been met. Since then, however, CLECs have learned that Qwest is generating the PSON at the time the Qwest service order is issued. In some cases, Qwest generates the PSON and sends it for review by the CLEC before the Qwest service order is in an RL (released Eastern and Western region) or PD (pending in the Central Region) status. When a service order is sent before it is in an RL or PD status, it may require manual attention by Qwest. As a result, the CLEC will contact Qwest to have corrections made to the service order when the Qwest service order could be in a status that requires manual attention by Qwest. The CLEC spends

valuable time and resources to review a Qwest service order that is not in a ready to work status and may request a correction to a service order that may need additional attention by Qwest. This is inconsistent with the request initially made by CLECs to obtain a document that reflects the service order detail “to be included in the FOC so that errors can be identified and contacted before the order completes.” The PSON should be created at a point in time when the information provided is sufficient to allow a meaningful comparison between the LSR and the service order detail. By not disclosing that Qwest is generating the PSON prematurely in at least some cases, Qwest has reserved for itself the argument that the mismatch may not result in an error on the due date while imposing upon its competitors a resource burden that ultimately does not accomplish the purpose expressly stated by the CLECs when requesting the PSON. Giving CLECs a PSON before it has gone through the edit and assignment process is not logical. Given the clear statement of their purpose in requesting the PSON, CLECs could not have anticipated that Qwest would provide a document so early in the process that it cannot be used for the very comparison requested by CLECs. Completed CR 25497 providing the PSON, clearly stated the purpose of the receiving the information was to review the service order for accuracy. Generating and sending the information prior to a ready to work status on the Qwest service order does not fulfill the original CR.

AT&T

http://www.qwest.com/wholesale/cmp/archive/CR_SCR022703-14.htm

SCR022703-14 Completed

Title: Support IMA EDI generated Pending Service Order Notice and Status Updates via IMA GUI

Description of Change:

Currently if an order is generated thru IMA EDI then order status can not be accessed via IMA GUI. AT&T is requesting for Orders sent via IMA EDI that Pending Service Order Notices (PSONS) and Status updates - Auto Push transaction be supported via IMA GUI. This allows a CLEC that doesn't want to support these transactions via IMA EDI, the ability to get access to this additional information when it is necessary (such as investigating pending service orders issues.)