

**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-32

TO

REBUTTAL TESTIMONY OF

BONNIE J. JOHNSON

ON BEHALF OF ESCHELON TELECOM, INC.

DECEMBER 4, 2006

**CHANGE REQUESTS RELATED TO FATAL REJECT NOTICES IN QWEST'S
PRODUCT AND PROCESS, AND SYSTEMS CHANGE REQUEST ARCHIVES**

Qwest

http://www.qwest.com/wholesale/cmp/archive/CR_23980.htm

CR 23980 Completed

1/17/2002

Title: LSR Reject Reason Standardization

Description of Change:

The purpose of the UR is to develop standardized CRM rejection codes. This candidate will establish a standardized list of approved reject codes and descriptions that apply consistently to all rejected LSRs.

Qwest

http://www.qwest.com/wholesale/cmp/archive/CR_25381.htm

CR 25381 Completed

7/18/2002

Title: Implement edit to reject requests for conversion from Remote Call Forward for UBL

Description of Change:

Implement the edit to automatically reject request in IMA for conversion from a Remote Call Forwarding (also referred to as a Market Expansion Line) to an UBL or UBL with Number Port. This CR is related to the Electronic Flow-through Performance Indicator Definition (PIDs PO2A and B) and the LSR Rejection Notice Interval PID (PO3). Colorado Docket 01I-041T. PID definitions can be found at <http://www.nrri.ohio-state.edu/oss/master/perform/perform.htm>.

The benefit to CLECs is that errors are caught much earlier in the process and reduces the likelihood that the CLEC customer will be impacted.

When a CLEC sends in an LSR requesting a conversion from a Remote Call Forwarding to an unbundled loop it is erroring in the Qwest Service Order Processor, which impacts the PO2 measurement. A conversion from an RCF to an Unbundled Loop is not applicable since there are no facilities on the RCF and the LSR is later rejected. This request will reject the LSR upfront. The CLEC can then submit the LSR for a new loop with portability and use the RCF as the ported number and an LSR for the disconnect order on the RCF account. This applies to Unbundled Loop and Unbundled Loop with number port, REQ TYPE = A and B; ACT=V, Z. A remote Call Forwarding or Market Expansion Line has the below classes of service, based on the state. The USOC and Class of Service are the same. Only One RCF is billed to an account but it may have multiple paths (or additional lines that use the same TN). The table below defines the States, Service and USOC associated with this CR.

Qwest

http://www.qwest.com/wholesale/cmp/archive/CR_31766.htm

CR 31766 **Completed**

4/7/2003

Title: Reject Duplicate LSRs

Description of Change:

IMA should reject duplicate requests. They are currently accepted and processed as new LSRs.

A duplicate LSR can be described as any LSR requesting the same activity for the same account, telephone number(s), or circuit(s) as another pre-existing LSR from the same CLEC. The intent of this request is to mechanically reject any duplicate LSR before it is accepted in IMA. Currently, duplicate LSRs are identified and rejected manually. The current manual process to identify a duplicate is tedious and time-consuming which causes delays in notifying the CLEC.

Approximately 1,000 duplicate LSRs were measured in the month of December, 2001

Currently, LSRs that are a duplicate of another LSR can qualify for flow through. However, the duplicate should not be eligible for flowthrough. The duplicate will usually fall out for manual handling, most often because a service order associated with the first LSR is already pending

Sprint

http://www.qwest.com/wholesale/cmp/archive/CR_5365971.htm

CR 5365971 **Withdrawn**

3/2/2001

Title: Partial Rejects on DL for REQTYP JB orders

Description of Change:

Sprint is requesting Qwest to reject all of the order if any portion of the listing order errors on REQTYP JB orders. If any Qwest system errors on a JB order, QWEST would send a 'REJECT' on the entire order rather than 2 responses coming back (one for rejected listing and one for correct listing). Similar to how the other products offered by QWEST are supported today. This would allow Co-provider to send back the order with the same activity that was originally sent.

MCI

http://www.qwest.com/wholesale/cmp/archive/CR_SCR013003-01.htm

SCR013003-01 **Completed**

12/17/2003

Title: Offer Choice for Receiving Non-Fatal Rejects. The choice of not receiving non-fatals would result in an immediate receipt of the fatal reject.

Description of Change:

Qwest current process calls for non-fatal errors to be generated and if not worked within 4 hours, resubmitted to CLECs as fatal errors with same PON and Version. This can result in duplicate rejects. WCom recommends a change that would result in a choice of receiving or not receiving non-fatal rejects based on CLEC criteria. The choice of not receiving non-fatals would result in the receipt of an immediate reject.

MCI

http://www.qwest.com/wholesale/cmp/archive/CR_SCR021403-01.htm

SCR021403-01 **Withdrawn**

2/11/2004

Title: Add New Reject & Jeopardy for MW1 Unavailability

Description of Change:

PART I : WCom requests that Qwest implement a new, unique IMA BPL reject code when any one of the three Message Waiting Indicator (MWI) feature USOCs {MWI - Audible (USOC: MWW), MWI - Visual (USOC: MV5), or MWI – Audible/Visual (USOC: M1W)} is not available. The unique reject code would be systematically returned to the CLEC submitting a LSR requesting MWI (MWW, MV5, or M1W) when the MWI feature is not available to the end customer due to Qwest switch limitations that prevent support of the MWI feature. The reject reason would be that the MWI feature (USOC) is not available.

PART II : WCom requests that Qwest implement a new, unique Jeopardy when any one of the three MWI feature USOCs is not available. The unique jeopardy code would be systematically returned to the CLEC that had submitted the LSR requesting MWI (MWW, MV5, or M1W) when Qwest determines post-FOC that the MWI feature is not available to the end customer due to the CLEC MDSI link not being provisioned / activated with the Qwest switch. The jeopardy reason would be that the MWI feature (USOC) is not available.

Eschelon Telecom, Inc.

http://www.qwest.com/wholesale/cmp/archive/CR_SCR030405-01.htm

SCR030405-01 **Completed**

5/19/2006

Title: Change to Reject RT Codes

Description of Change:

Currently the fatal rejects and the ISC rejects share the same RT value of Z. This makes it difficult to code internal messages to users letting them know what type of reject they have received. You currently have to look at the message codes to determine which type of reject you have.

Eschelon is requesting that Qwest implement a new RT value for the ISC Reject. This will allow coding to take place based on the RT value as with all the other types of responses. This will cause less confusion for the users and help eliminate unnecessary calls to both the Wholesale Helpdesk and the Interconnect Helpdesk.

Eschelon expects that Qwest will develop an individual RT value for the ISC Reject and retain the Z RT value for BPL (Fatal) Rejects.

MCI

http://www.qwest.com/wholesale/cmp/archive/CR_SCR042903-01.htm

SCR042903-01 Completed

9/17/2004

Title: Provide Greater Detail in Manual Reject Code/Descriptions and add New IMA Reject Reason, "Requested Product Not Available"

Description of Change:

This Change Request is proposing that Qwest modify the manual reject Codes and Descriptions provided on ISC rejected LSRs. Currently, MCI is identifying 4-5 different reject codes (ORD XXX) selected by ISC reps and associated generic descriptions that don't specifically address the nature of the issue with the rejected LSR. Rather, ISC reps utilize the LEC Remarks field on the Reject Notifier. MCI is proposing Qwest make available more options to ISC reps and that those codes/descriptions more specifically identify the cause or causes of the manual clarification. Reps could choose more than a single code/description (all reasons that failed manual review), and provided multiple reject responses with unique codes and descriptions. If additional information needs to be conveyed, reps remarks could be appended to the description rather than entered in Remarks. This would allow CLEC error correction reps to only review the Code and Description fields. In addition, it would allow CLECs greater accuracy in reporting and auditing Reject Notifiers, allowing CLECs to address self initiated issues more timely, without having to review Codes, Description and LEC Remarks fields.

AT&T

http://www.qwest.com/wholesale/cmp/archive/CR_SCR060903-01.htm

SCR060903-01 Completed

11/18/2004

Title: Reject Message Required If Call Waiting ID Unavailable in Switch

Description of Change:

Currently, if a CLEC submits an LSR for UNE-P requesting Call Waiting ID (USOC = N2W) and the feature is not available in a particular switch, Qwest will process the order without the feature. AT&T requests that Qwest reject the LSR and allow AT&T to contact the customer and let the customer make the decision as to whether or not the customer still wants the service without the feature.

Allegiance

http://www.qwest.com/wholesale/cmp/archive/CR_PC062602-2.htm

PC062602-2 Closed

10/23/2002

Title: Rejects on CLEC to CLEC Reuse of Facilities orders for no circuit IDs found

Description of Change:

While there is a process in place to be able to submit CLEC to CLEC reuse of facilities orders without providing circuit ID information, 90% of the orders submitted by Allegiance since late May 2002 are being rejected for various erroneous and invalid reasons regarding the circuit ID information. While working through these rejected orders with Russ Urveig, it was discovered that the process currently in place for Qwest's SDCs to find working circuits needs to be redesigned, job aides need to be changed, and the SDCs need more training. While Allegiance received rejects for "no working circuits at end user address", "unable to validate address to find circuits that are working", and "these numbers on this LSR are ported to XXX Company" – Russ was able to locate working, reusable UNE DS0 Circuits.

While some of the rejects proved out that there were no reusable UNE DS0 circuits, the reject reasons did not clearly state the true circumstances. For example one reject stated "no working circuits found". When further researched, it was found that there were indeed working circuits there but the only working circuits for the End User were DS1s.

Allegiance would also like to collaboratively work with Qwest and other CLECs to establish clear, definitive reject reasons for CLEC to CLEC reuse of facilities orders to insure that all resources available to the SDCs have been utilized to find working circuits. When Allegiance submits CLEC to CLEC reuse of facilities orders, we already have obtained a CSR from the CLEC so we know the numbers we are porting are indeed working on some kind of circuit. These reject reasons should be clear enough to insure the CLEC that there are indeed no working UNE DS0 circuits to reuse. As stated above some of the orders rejected did indeed have available working UNE DSO circuits that could be reused. Allegiance currently does not have confidence that the SDC's reject reasons are valid and their training is adequate to locate reusable UNE DS0 circuits. In many instances we are having to drop new loops in order to take the customer when there are reusable loops available. Installing new loops is more expensive, more time consuming for the cut over, and there is the risk the orders will be held for lack of facilities. The ability to "reuse" facilities is less expensive, the cut over process is less time consuming, and the end user has less down time.

Qwest

http://www.qwest.com/wholesale/cmp/archive/CR_PC012604-1.htm

PC012604-1 Completed

12/15/06

Title: LSR Rejects with RPON

Description of Change:

Establish a process on how RPONs should be handled when a reject condition exists on one or more the related LSRs.

Expected Deliverable:

Qwest currently does not have a documented process on how LSRs that are related with RPON should be handled when a reject condition exists on one or more of the LSRs. Qwest is proposing the following process: LSRs that are due dated the same day and are

RPON'd, will reject all. LSRs submitted where processing one or more is dependent on processing the other(s) will all be rejected. Qwest will further define this statement with further research.

Qwest

http://www.qwest.com/wholesale/cmp/archive/CR_SCR073003-01.htm

SCR073003-01 **Withdrawn**

8/15/2003

Title: IMA Add New IMA Reject Reason, "Requested Product Not Available

Description of Change:

The new reject reason would be used by a Qwest employee to reject a CLEC request for a product unavailable due to regulatory or network conditions or for other reasons not covered by existing reasons. The Qwest employee would have the ability to add comments as needed to further explain the reason for the reject.

Qwest

http://www.qwest.com/wholesale/cmp/archive/CR_SCR111402-01.htm

SCR111402-01 **Completed**

9/17/2004

Title: Reject Invalid Special Characters

Description of Change:

Reject LSRs when special characters are input in specific fields.