

**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-36**

**TO**

**REBUTTAL TESTIMONY OF**

**BONNIE J. JOHNSON**

**ON BEHALF OF ESCHELON TELECOM, INC.**

**DECEMBER 4, 2006**

**From:** Isaacs, Kimberly D. [CONTACT INFORMATION REDACTED]  
**Sent:** Friday, November 03, 2006 9:50 PM  
**To:** Novak, Jean; Dobesh, Mary  
**Subject:** Qwest Jeopardy Process Tracking 11-3-06

Have a great week.

*Kim Isaacs*  
*Eschelon Telecom, Inc.*  
*ILEC Relations Process Specialist*  
**Ph:** [CONTACT INFORMATION REDACTED]  
**Fax:** [CONTACT INFORMATION REDACTED]  
**Email:** [CONTACT INFORMATION REDACTED]

**From:** Novak, Jean [CONTACT INFORMATION REDACTED]  
**Sent:** Tuesday, November 07, 2006 9:04 AM  
**To:** Isaacs, Kimberly D.  
**Cc:** Dobesh, Mary  
**Subject:** Qwest Jeopardy Process Tracking 11-3-06  
**Attachments:** SENT 2006.11.3 Qwest Jep Process Tracking.xls

Kim  
Qwest has determined that due to resources Qwest will not be reviewing this report any longer. Qwest through self reporting internally will manage the process and compliance of the delayed order process.

Thanks  
Jean Novak

**From:** Isaacs, Kimberly D. [CONTACT INFORMATION REDACTED]  
**Sent:** Monday, November 13, 2006 2:14 PM  
**To:** Novak, Jean; Dobesh, Mary  
**Cc:** Johnson, Bonnie J.  
**Subject:** Qwest Jeopardy Process Tracking 11-13-06

Hello,  
Eschelon continues to request that Qwest review the jeopardy process compliance. Thank you.

*Kim Isaacs*  
*Eschelon Telecom, Inc.*  
*ILEC Relations Process Specialist*  
**Ph:** [CONTACT INFORMATION REDACTED]  
**Fax:** [CONTACT INFORMATION REDACTED]  
**Email:** [CONTACT INFORMATION REDACTED]

**From:** Novak, Jean [CONTACT INFORMATION REDACTED]  
**Sent:** Monday, November 13, 2006 2:19 PM  
**To:** Isaacs, Kimberly D.; Dobesh, Mary  
**Cc:** Johnson, Bonnie J.  
**Subject:** RE: Qwest Jeopardy Process Tracking 11-13-06

Based on resources, Qwest will not be reviewing individual spreadsheets. Qwest will be relying on internal reports to insure compliance. Thanks

**From:** Isaacs, Kimberly D.  
**Sent:** Monday, November 20, 2006 11:23 AM  
**To:** 'Novak, Jean'; Dobesh, Mary  
**Cc:** Johnson, Bonnie J.; Isaacs, Kimberly D.  
**Subject:** RE: Qwest Jeopardy Process Tracking 11-20-06

As you know, Eschelon disagrees. Eschelon's request that Qwest review our data and respond to it is ongoing. Thank you.

*Kim Isaacs*  
*Eschelon Telecom, Inc.*  
*ILEC Relations Process Specialist*  
**Ph:** [CONTACT INFORMATION REDACTED]  
**Fax:** [CONTACT INFORMATION REDACTED]  
**Email:** [CONTACT INFORMATION REDACTED]

**From:** Isaacs, Kimberly D.  
**Sent:** Monday, November 27, 2006 8:11 AM  
**To:** 'Novak, Jean'; 'Dobesh, Mary'  
**Cc:** Johnson, Bonnie J.; Isaacs, Kimberly D.  
**Subject:** Qwest Jeopardy Process Tracking - 11/27/2006

Eschelon continues to request that Qwest review the jeopardy process compliance. Thank you.

*Kim Isaacs*  
*Eschelon Telecom, Inc.*  
*ILEC Relations Process Specialist*  
**Ph:** [CONTACT INFORMATION REDACTED]  
**Fax:** [CONTACT INFORMATION REDACTED]  
**Email:** [CONTACT INFORMATION REDACTED]

**From:** Novak, Jean [CONTACT INFORMATION REDACTED]  
**Sent:** Monday, November 27, 2006 11:50 AM  
**To:** Isaacs, Kimberly D.; Dobesh, Mary  
**Cc:** Johnson, Bonnie J.  
**Subject:** RE: Qwest Jeopardy Process Tracking - 11/27/2006

Qwest will be utilizing internal reports which will capture all issues for all customers.

**From:** Isaacs, Kimberly D.  
**Sent:** Monday, November 27, 2006 11:55 AM  
**To:** 'Novak, Jean'; Dobesh, Mary  
**Cc:** Johnson, Bonnie J.; Isaacs, Kimberly D.  
**Subject:** RE: Qwest Jeopardy Process Tracking - 11/27/2006

As you know, Eschelon disagrees. Eschelon's request that Qwest review our data and respond to it is ongoing

*Kim Isaacs*

*Eschelon Telecom, Inc.*

*ILEC Relations Process Specialist*

*Ph:* [CONTACT INFORMATION REDACTED]

*Fax:* [CONTACT INFORMATION REDACTED]

*Email:* [CONTACT INFORMATION REDACTED]

## **Qwest's Comments on Eschelon's Jeopardy Analysis**

-----Original Message-----

**From:** Novak, Jean [CONTACT INFORMATION REDACTED]  
**Sent:** Wednesday, August 25, 2004 2:44 PM  
**To:** Johnson, Bonnie J.  
**Cc:** Larson, Laurie A.; Karen Clauson; Kimberly Isaacs; Raymond Smith;  
Novak, Jean; Tietz, Jeff  
**Subject:** Qwest Held Order Jeopardy Process Compliance

Bonnie

Attached is the jeopardy analysis completed on the examples provided to Qwest by Eschelon. Qwest would like to note:

- 1.) Five of the LSRs in the spreadsheet are where a FOC was not sent timely prior to the due date because Qwest resolved the facility condition either on PTD or on the due date. The delayed order process was not where the breakdown occurred, rather resolving the facility issue late in the process and still attempting to meet the customers due date. Qwest will continue to monitor this.
- 2.) There were a number of LSRs listed that were due to workforce, B33. It is my understanding that this was discussed in CMP and agreed to by the CLEC community to ignore B33s sent prior to the due date.

In summary:

There were several LSRs that were listed more than once and Qwest provided an explanation for the overall LSR only once.

There were approximately 26 where Qwest saw no process gaps and the CLEC should have expected us on the due date that was FOC'd.

There were 16 where Qwest has taken appropriate action. Of those 16, 5 were due to the issue described above with resolving the facility really late in the process; 5 of those will be addressed through coaching and the other 6 were miscellaneous issues addressed by Qwest.

Let me know if you have additional questions or feedback.

Thanks,  
Jean Novak

-----Original Message-----

**From:** Johnson, Bonnie J. [CONTACT INFORMATION REDACTED]  
**Sent:** Wednesday, August 25, 2004 4:04 PM  
**To:** Novak, Jean; Johnson, Bonnie J.  
**Cc:** Larson, Laurie A.; Clauson, Karen L.; Isaacs, Kimberly D.; Smith, Raymond L; Tietz, Jeff  
**Subject:** RE: Qwest Held Order Jeopardy Process Compliance

Jean,

You are correct about the B jeps. Qwest did tell Eschelon to ignore those jeps. Eschelon told Qwest it was sending the universe of DS1 jeoaprdies to review. Eschelon communicated it did so, because Qwest could then tell what Qwest employees/groups/centers were following process and where Qwest needed to focus attention or additional training. I hope Qwest did not spend a significant amount of valuable time doing root cause on those jeopardies where Eschelon agrees Qwest followed its process. As you can see from the spreadsheet, on all but one of the B jeopardies, Eschelon agreed Qwest followed process. The B jeopardy that is marked no, was marked no because Eschelon ignored the B jeopardy, as Qwest's process states (because Qwest said in all cases Qwest meets the DD) and Qwest missed the due date. In those cases, Eschelon is unable to notify the customer until after Qwest has already missed the commitment.

In addition, on those responses Qwest said Eschelon provided duplicates, the LSR had multiple jeopardies and Eschelon was communicating each jeopardy for the LSR separately. On line 15 Eschelon agrees Qwest followed the process, however, on line 9 where Qwest states it is a duplicate, Qwest did not follow the process. Can you confirm that line 9 was addressed? The Qwest comments says duplicate see line 7 and line 7 was a different jeopardy for that LSR.

<<Qwest Analysis of Jeopardy Compliance Eschelon Orders

080104-081204.xls>>

Bonnie J. Johnson

Director Carrier Relations

Eschelon Telecom, Inc.

Phone [CONTACT INFORMATION REDACTED]

Fax [CONTACT INFORMATION REDACTED]

Cell [CONTACT INFORMATION REDACTED]

[CONTACT INFORMATION REDACTED]

### **From Eschelon Issues Logs for Service Manager Meetings**

**2/28/05 Jean said Qwest looked at January data and found had Qwest people that did not understand process and were not following the process. Qwest is training. Qwest did see on some the 72 hour response sent when Eschelon checked no.**

**3/28/05 Jean wrote "Qwest completed on the analysis on Eschelon's February Delayed Orders that were sent on March 7, 2005 with the following results: Missed sending the 72 hour update notification . Qwest is currently working with each department. that updates information to insure the Delayed Order Group receives the information needed for processing. Missed sending the Releasing FOC . Qwest has trained individually and with the group. In addition, tracking information from other Qwest departments. Correction action has taken place."**

**5/4/05 Jean said Chris Siewert was not happy with the the results of the data Kim continues to send Qwest on a daily basis. Bonnie asked if this was network realted and Jean said it was also center related and Phyllis is working with network. Chris said they found an SDC that needed to be trained. Qwest has provided no additional information on FOC 24 hours before the DD.**

**8-3-05 Team Meeting** Jean stated that Qwest continues to look at data and take appropriate training action, In June Eschelon reported a 74% compliance rate and Qwest believes the compliance was at 80%. Jean will provide Qwest's analysis to Kim to review. Jean once again stated that Qwest disagrees that it is Qwest's process to send the releasing FOC 24 hours prior to the FOC due date. Jean stated that Eschelon should open a CMP CR if we would like to change the process.

**10/5/05** Per Jean Qwest implemented a new tracking process to track network sending information so Qwest can send an FOC. Bonnie asked if Eschelon should continue to send the delayed data to Qwest. Jean said yes. in October. The tracking mechanism was implemented in Colorado sometime. Eschelon told Jean that starting in October Eschelon was going to break down the "no FOC" with more detail. Eschelon wants to ensure that Qwest is looking at multiple compliance issues orders and just because there was an FOC did not want other misses overlooked. Jean said Qwest still looks at all of the data, even the no FOC, to determine why no FOC was sent even though Qwest does not consider this non compliance.

**5/3/06** Chris Siewert said they analyze the orders. Jean said they address coaching opportunities. Jean said if cross functional she sends to process.

**6/7/06: Monthly Call** - Kim indicated they she has saw a decrease in the jeopardy process compliance, many of the mistakes appeared to be "rookie" mistakes. Eschelon has seen slight improvements over the last month or so. Jean indicated that the jeopardy process data is being used to coach new Qwest personnel