

**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-37

TO THE

REBUTTAL TESTIMONY OF BONNIE JOHNSON

ON BEHALF OF ESCHELON TELECOM, INC.

DECEMBER 4, 2006

Product & Process CRs Withdrawn by Qwest (2001-2006)

Total Qwest Product and Process Change Requests Submitted (2001 to 9/19/2006) = 114								
Total Qwest Product and Process Change Requests Withdrawn by Qwest (2001 to 9/19/2006) = 14 or 12%								
Year Submitted	CR Number	CR Title	Date CR Submitted	CR Submitted By	CR Status	Did Qwest withdraw the CR due to CLEC objection?	CR information on reason for withdrawal	CR URL
2001	PC112901-1	Standardize Process of Receiving Jeopardy Notices	11/29/2001	Qwest	Withdrawn	NO	No notes in the CR to explain why Qwest withdrew this CR. Qwest submitted the CR on 11/29/01 and withdrew it on 12/12/01. No discussion or CLEC objection is noted in the CR.	http://www.qwest.com/wholesale/cmp/archive/CR_PC112901-1.htm
2001	PC112701-2	Grandparent SwitchNet 56	12/12/2001	Qwest	Withdrawn	NO	No notes in the CR to explain why Qwest withdrew this CR. Qwest submitted the CR on 11/27/01 and withdrew it on 12/12/01. No discussion or CLEC objection is noted in the CR. Notes say Qwest was filing with Commissions.	http://www.qwest.com/wholesale/cmp/archive/CR_PC112701-2.htm
2002	PC043002-1	Fiber Provider Point of Entry	4/30/2002	Qwest	Withdrawn	NO	No notes in the CR to explain why Qwest withdrew this CR. Qwest submitted the CR on 4/30/02 and withdrew it on 5/9/02. No discussion or CLEC objection took place or is noted in the CR detail. Notes say withdrawn by originator. This was a new product.	http://www.qwest.com/wholesale/cmp/archive/CR_PC043002-1.htm
2003	PC021103-1	Conditioning for DSL level Data Services in all Products at no charge to the CLEC/DLEC	2/11/2003	Qwest	Withdrawn	NO	Qwest withdrew this CR and issued multiple CRs in its place not because CLECs objected. CR notes state: "Qwest wishes to withdraw CMP CR PC021103-1 CR because the changes it requests are more fully presented and detailed in CMP CRs PC022403-2, PC022403-3, PC022403-4, PC022403-5, PC022403-6, PC022403-7, and PC022403-8. Qwest presented these CRs at the Ad Hoc CMP Meeting on March 3, 2003."	http://www.qwest.com/wholesale/cmp/archive/CR_PC021103-1.htm
2003	PC040103-1	Grandfather of Integrated T-1 in Denver and Seattle.	4/1/2003	Qwest	Withdrawn	NO	The CR detail does not contain the reason Qwest withdrew the CR. Notes indicated there was some discussion and questions about the CR, however, CLECs did not object. Qwest submitted the CR on 4/1/03 and Qwest presented its withdrawal on 5/21/03.	http://www.qwest.com/wholesale/cmp/archive/CR_PC040103-1.htm
2003	PC072103-1	DLR Option Change	7/21/2003	Qwest	Withdrawn	NO	The CR detail states "08/20/03 August CMP Meeting Kathy McBride with Qwest said that Qwest would like to withdraw the CR because, when implemented, will be a level 3 notification." There was some discussion, however, there was no CLEC objection.	http://www.qwest.com/wholesale/cmp/archive/CR_PC072103-1.htm
2003	PC081903-1	Change in Resale, UNE and Interconnection Services Service Interval Guide (SIG)	8/19/2003	Qwest	Withdrawn	NO	The CR detail states: "09/17/03 - September CMP Meeting Sandy Stulen with Qwest gave an update on this CR. Qwest would like to withdraw this CR and doesn't plan to change the SIG." There was some discussion, however, there was no CLEC objection.	http://www.qwest.com/wholesale/cmp/archive/CR_PC081903-1.htm
2003	PC110303-2	New Collocation Product Development Louvered Pedestal Collocation	11/3/2003	Qwest	Withdrawn	NO	The CR detail states: "11/19/03 Nov. CMP Meeting Ben Campbell Qwest asked that this CR be withdrawn because it is a modification to an existing product. He said that Louvered Pedestal Collocation had been discussed and a Network Notification had been issued in August. This is a follow up making modifications to the existing product. The intent is to make this a Level 3 change with continued CLEC joint planning."	http://www.qwest.com/wholesale/cmp/archive/CR_PC110303-2.htm

Product & Process CRs Withdrawn by Qwest (2001-2006)

2004	PC010604-1	Grandparent DSL Pro USOCs.	1/6/2004	Qwest	Withdrawn	NO	The CR detail states: "03/17/04 March CMP Meeting Janean Van Dusen with Qwest gave an update that Qwest would like to withdraw this CR. This CR will move to Withdrawn Status." Minimal discussion took place, however, there was no CLEC objection.	http://www.qwest.com/wholesale/cmp/archive/CR_PC010604-1.htm
2004	PC021204-1	Port In and Add New Non Ported Tn(s) on same LSR	2/12/2004	Qwest	Withdrawn	NO	The CR detail states: "03/17/04 March CMP Meeting Susie Wells with Qwest said she would like to withdraw this CR because it is not a level 4 change and actually is a level 3 change to an existing process. Updates will be made in the Port In PCAT."	http://www.qwest.com/wholesale/cmp/archive/CR_PC021204-1.htm
2004	PC062904-1	Grandparent LADS in CO, UT and OR effective 9/7/04	6/29/2004	Qwest	Withdrawn	NO	No notes in the CR to explain why Qwest withdrew this CR. Qwest submitted the CR on 6/29/04 and withdrew it on 7/21/04. No discussion or CLEC objection took place or is noted in the CR detail.	http://www.qwest.com/wholesale/cmp/archive/CR_PC062904-1.htm
2004	PC072204-1	Clarification of wording for CLEC to CLEC Connections	7/22/2004	Qwest	Withdrawn	JOINT	The CR detail states: "9/16/04 CMP Meeting Minutes Mark Nickell reported that an ad-hoc call was held and it was mutually agreed to suspend CMP meetings until the current dispute resolution activities conclude in Colorado." Qwest submitted this as a CR because Qwest was changing a download on the collocation site to a PCAT. CLECs did object to Qwest Changes that added the word "common" to ICDF (Qwest said this was a clarification) for two reasons. The CR was in conflict with Eschelon CR PC120301-4 which Qwest completed in April of 2002 and, Covad was arbitrating this issue in CO and both parties agreed to defer the CR until the issue was decided. CR detail notes also state: "2/15/06 Product Process CMP Meeting Jill Martain-Qwest stated that this CR had been in Deferred status for awhile and stated that Qwest would like to withdraw the CR. This CR moves to Withdrawal status."	http://www.qwest.com/wholesale/cmp/archive/CR_PC072204-1.htm
2004	PC092104-1	Grandparent Scan Alert in OR and WA	9/21/2004	Qwest	Withdrawn	NO	The CR detail states: "December CMP Meeting Minutes Janean Van Dusen – Qwest advised this CR was cancelled by Retail as there were some issues in Washington. This CR will move to Withdrawn Status."	http://www.qwest.com/wholesale/cmp/archive/CR_PC092104-1.htm
2006	PC030606-1	Qwest contacting CLECs Customers to confirm access	3/6/2006	Qwest	Withdrawn	JOINT	The CR detail states: "4/19/06 Product/Process CMP Meeting Jill Martain-Qwest stated that this CR was discussed at the March CMP Meeting and stated that Qwest would like to withdraw the request. Georganne Weidenbach-Qwest stated that based on CLEC comments and further Qwest analysis, Qwest made a decision that the CLEC volume, of no access misses was very small and that Qwest would like to withdraw the CR. Georganne noted that Qwest may pursue this later if the volumes rose. There were no objections to the withdrawal request. This CR moves to Withdrawn Status." Eschelon did tell Qwest at the meeting that this request ("Laura Baird-Qwest stated that Qwest would like permission to contact the end user to confirm access arrangements when required for repair and service orders prior to the field technician going out to the premises. Laura provided an example of a situation of when we would contact the end user.) was in conflict with Qwest's own SGAT.	http://www.qwest.com/wholesale/cmp/archive/CR_PC030606-1.htm