

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of the
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST Communications,
Inc.'s Statement of Generally Available Terms
Pursuant to Section 252(f) of the
Telecommunications Act of 1996

Docket No. UT-003040

**QWEST CORPORATION'S REPORT
ON THE STATUS OF CHANGE
MANAGEMENT PROCESS REDESIGN**

Qwest Corporation provides this status report regarding the meetings it has held with CLEC representatives regarding the redesign of Qwest's Change Management Process ("CMP").

I. BACKGROUND

CLEC and Qwest representatives have met for more than 45 days over the past eleven months to discuss every aspect of Qwest's CMP. As a result of this extensive collaboration, Qwest and the CLEC community have reached agreement on every significant issue identified by the CLECs.¹ It is important to note that AT&T has stated on the record that once these issues are resolved -- as they

¹ As reported in prior status reports, the redesign team reached agreement regarding the following: scope of CMP; escalation and dispute resolution processes for the CMP; processes for systems change requests ("CRs") submitted by CLECs; processes for product and process CRs submitted by CLECs; interim exception processing for OSS interfaces, product, and process changes; process for introduction of a new OSS interface; process for changes to existing OSS interfaces; process for retirement of an OSS interface; process for interface testing; process for CMP meetings; production support processes, including a technical escalation process; prioritization of systems CRs; special change request process (agreement in principle); interim Qwest-initiated product/process change process; process for changing the CMP; language to address conflicts between CMP changes and interconnection agreements; OSS interface release calendar; process for ranking late added CRs; list of defined terms; exception process; Qwest-Initiated Product/Process Change Process; withdrawal of prioritized CRs; reasons for Qwest denial of CRs; Special Change Request Process; crossover CRs; training; implementation of regulatory CRs; postponement and arbitration of a product/process change; OSS interface CR process; and SGAT Section 12.2.6.

now are -- there are no remaining issues to be resolved for section 271 purposes regarding Qwest's change management process.²

Qwest has implemented the agreed process and posted the updated Qwest Wholesale Change Management Process document ("Wholesale CMP") describing it on the "What is CMP?" page of Qwest's wholesale web site.³

II. THE REDESIGN TEAM HAS CLOSED ALL PRIORITY ISSUES⁴

The redesign team has reached agreement regarding detailed provisions memorializing all of the ten Category 0 issues and all of the twelve Category 1 issues for which the redesign team determined language was appropriate.⁵

The redesign reached agreement on detailed language relating to the last remaining issue, Category 1 issue V.c, on June 18, 2002. The team narrowed the scope of this issue to focused on the relationship between Qwest's Interconnect Service Center, to which CLECs initially report process issues, and Qwest's Wholesale Systems Help Desk, to which CLECs initially report systems issues. The redesign team agreed to detailed provisions, incorporated in Section 12.8 of the Wholesale CMP,

² *In the Matter of the Investigation into US WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996 and In the Matter of US WEST Communications, Inc.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996*, Docket Nos. UT 003022 and UT 003040, Transcript Volume LI (Pages 7452 to 7528) ("Washington Proceeding"), at 07513-07514.

³ Qwest's Wholesale Change Management Process Document, which is attached as Exhibit A, can also be found at the following URL: <http://www.qwest.com/wholesale/cmp/whatiscmp.html>. The agreements reached are interim draft agreements, subject to the CMP participants reviewing the agreements in the context of the entire final document.

⁴ Qwest established a web site where it has posted the redesign meeting minutes and other materials. The web site address is www.qwest.com/wholesale/cmp/redesign.html.

⁵ The current list of Category 1 and 0 issues is attached as Exhibit B. The team agreed that it is not necessary to insert language into the Wholesale CMP for Category 1 issues I.A.3 (process for non-coding changes) and V.d (rate changes and rate validation), and Category 0 issues I.A.10 (when issues are appropriate for CMP or account team), Covad Issue #1 (clarification of scope), Covad Issue #3 (retail changes), and WorldCom (Qwest's proof of implementation).

that document the relationship between the systems and process help desks to facilitate the efficient resolution of issues raised by CLECs. The process will assist Qwest in identifying and addressing related issues, regardless of which help desk the CLECs first call, even when several different CLECs call to report those issues.

As mentioned above, AT&T stated in the Washington Proceeding that resolution of the priority list issues would resolve all issues regarding Qwest's Wholesale CMP for section 271 purposes:⁶

JUDGE RENDAHL: I have a macro-level question for the CLECs. And I guess this is really addressed to you, Mr. Menezes, because it's raised in Exhibit 1540. And I want to confirm that the issues that are in your Exhibit 1540, AT&T and the CLECs agreed that if these issues are resolved to their satisfaction, that these are the issues that if they are resolved, then there is no issue for section 271 purposes with the change management process; is that correct?

MR. MENEZES: You referred to Exhibit 1540, which is the --

JUDGE RENDAHL: I am sorry. 1539.

MR. MENEZES: Okay. Yes. With 1539 that is what we have said. That's what we have said in our Arizona filing, and we have said here.

There are now no unsatisfied issues relating to the existence or content of Qwest's change management process for section 271 purposes. In addition, Qwest has established more than six months of experience with the core provisions of the redesigned process, with an overall compliance rate of nearly 99%. An updated matrix that catalogues Qwest's compliance with each of the sections of the Wholesale CMP is attached as Exhibit C. The matrix shows that the core provisions of the redesigned process have been in effect for more than six months

⁶ TR. 7513-7514

and lists each of the agreed-upon timeframes and Qwest deliverables in the Wholesale CMP, along with specific information detailing Qwest's record of compliance with those obligations.

The June 17-18, 2002 meeting was the last regularly scheduled redesign meeting. The redesign team expects to hold one or more conference calls over the next few weeks to complete the clean up process and address any remaining issues. Of course, Qwest will continue to meet with CLECs at the monthly CMP meetings to address issues through the industry-leading process Qwest and the CLECs jointly designed.

III. CONCLUSION

Qwest appreciates the time and effort the CLECs have devoted to participating in the redesign of Qwest's CMP. Qwest is confident that the collaborative redesign process has produced an effective CMP that meets CLEC needs and exceeds industry standards.

Dated this 24st day of June, 2002.

Qwest Corporation

 /Andrew D. Crain/
Andrew D. Crain
Qwest Corporation
1801 California Street, Suite 4900
Denver, CO 80202
Phone: (303) 672-2926

Lisa Anderl, WSBA #13236
Qwest Corporation
1600 7th Avenue, Room 3206
Seattle, WA 98191
Phone: (206) 345-1574

Attorneys for Qwest