

**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 DD-17**

**TO THE**

**REBUTTAL TESTIMONY OF DOUGLAS DENNEY**

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

**DECEMBER 4, 2006**

## CFA Change Chronology for Limit of One

- **9/11/06:** Qwest issues Level 3 CMP Notice (PROS.09.11.06.F.04161.P\_&\_I\_Overview\_V91) with an effective date of 10/26/06. This notice limited the CFA changes to one on the day of the cut.

Link to notice PROS.09.11.06.F.04161.P\_&\_I\_Overview\_V91 (also attached):

[http://www.qwest.com/wholesale/cnla/uploads/PROS.09.11.06.F.04161.P\\_&\\_I\\_Overview\\_V91.doc](http://www.qwest.com/wholesale/cnla/uploads/PROS.09.11.06.F.04161.P_&_I_Overview_V91.doc)

- **10/18/2006** Change Disposition of P&I CFA Changes (PROS.09.11.06.F.0461.P\_&\_I\_Overview\_V91) was included as a Walk On Agenda Item for the October 18, 2006 Product and Process CMP Meeting.

Link to October Product Process CMP Meeting Minutes (Found in Attachment A) (also attached):

[http://www.qwest.com/wholesale/calendar/attachments/NovemberProdProcDistributionPackage\\_34.pdf](http://www.qwest.com/wholesale/calendar/attachments/NovemberProdProcDistributionPackage_34.pdf)

- **10/20/06:** Qwest issues a Level 1 CMP notice (PROS.10.20.06.F.04281.Retract\_CFA\_P&I\_OvrwV91), effective immediately. This notice retracted the Level 3 notice issued on 9/11/06.

Link to Notice PROS.10.20.06.F.04281.Retract\_CFA\_P&I\_OvrwV91 (also attached):

[http://www.qwest.com/wholesale/cnla/uploads/PROS.10.20.06.F.04281.Retract\\_CFA\\_P&I\\_OvrwV91.doc](http://www.qwest.com/wholesale/cnla/uploads/PROS.10.20.06.F.04281.Retract_CFA_P&I_OvrwV91.doc)

- **10/26/2006:** Qwest issues MCC Notice (PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA effective 11/1/2006), with an effective date of 11/1/06. This notice explained that Qwest is still intending to hold the CLEC to one CFA change on the due date, but directs Qwest's Testers to "remain flexible and use their best judgment to determine if it is reasonable to expect the next CFA change to resolve the issue" and if Qwest's personnel decide that this expectation is not reasonable, the "CFA change should be refused and the CLEC should be pointed to the supplemental process." Qwest's notice also states that "If Qwest receives frequent attempts from a CLEC to verbally request numerous changes on DD before a good CFA is found, the Tester should post a Customer Jeopardy to the order and contact the CLEC's Service Manager to inform them of the situation."

Link to Notice: PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA (also attached):

<http://www.qwest.com/wholesale/cnla/uploads/PROS%2E10%2E26%2E06%2EF%2E04290%2EMCC%5FVerbal%5FSUPP%5FCFA%2Edoc>

- **10/31/2006:** Eschelon sends email to Qwest asking Qwest to retract PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA (Email Attached). Eschelon explains that Qwest's 10/26/06 notice, which effectively limits CFA changes to one per circuit on the day of the cut, is a change in process and should be issued as a Level 4 CMP change request. Eschelon also explains that limiting CFA changes on the day of the cut to one per circuit was not Qwest's intent and that Qwest has been performing multiple CFA changes for four years. In Eschelon's response, Eschelon said:

“CR 5548229 was implemented and completed in August of 2002. Although Qwest is now claiming that Qwest had always intended to limit CFA changes to one per circuit, since the process was implemented *more than four years ago*, Qwest has been performing multiple CFA changes for CLECs. CR 5548229 and the Qwest PCAT do not limit verbal CFA changes on the due date to one per circuit. In fact, an example used for purposes of implementing the CR contains multiple changes to one CFA (See [http://www.qwest.com/wholesale/cmp/archive/CR\\_5548229.htm](http://www.qwest.com/wholesale/cmp/archive/CR_5548229.htm) ). Therefore it is clear from the face of the CR's status history that the intent was not to limit this to one.”

- **11/15/2006** MCC Retraction Request (PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA) is included as a Walk On Agenda Item for the November 15, 2006 Product and Process CMP Meeting. Meeting Minutes of the November 15, 2006 Product and Process CMP Meeting are pending posting.



**Announcement Date:** September 11, 2006  
**Proposed Effective Date:** October 26, 2006  
**Document Number:** PROS.09.11.06.F.04161.P\_&\_I\_Overview\_V91  
**Notification Category:** Process Notification  
**Target Audience:** CLECs, Resellers  
**Subject:** CMP - Provisioning and Installation Overview - V91.0  
**Level of Change:** Level 3

**Summary of Change:**

On September 11, 2006, Qwest will post planned updates to its Wholesale Product Catalog that include new/revised documentation for Provisioning and Installation Overview. These will be posted to the Qwest Wholesale Document Review Site located at <http://www.qwest.com/wholesale/cmp/review.html>

Updates are associated with a change to verbal supplement for CFA slot changed on the due date. In the Provisioning Points of Interface section under Provider Initiated Activity (PIA), Qwest will be providing additional language which describes the Qwest and CLEC responsibilities for CFA or slot changes.

Current operational documentation for this product or business procedure is found on the Qwest Wholesale Web Site at this URL:  
<http://www.qwest.com/wholesale/clecs/provisioning.html>

**Comment Cycle:**

CLEC customers are encouraged to review these proposed changes and provide comment at any time during the 15-day comment review period. Qwest will have up to 15 days following the close of the comment review to respond to any CLEC comments. This response will be included as part of the final notification. Qwest will not implement the change sooner than 15 days following the final notification.

Qwest provides an electronic means for CLEC customers to comment on proposed changes. The Document Review Web Site provides a list of all documents that are in the review stage, the process for CLECs to use to comment on documents, the submit comment link, and links to current documentation and past review documents. The Document Review Web Site is found at <http://www.qwest.com/wholesale/cmp/review.html>. Fill in all required fields and be sure to reference the Notification Number listed above.

**Timeline:**

Planned Updates Posted to Document Review Site	Available September 11, 2006
CLEC Comment Cycle on Documentation	Beginning September 12, 2006

Begins	
CLEC Comment Cycle Ends	5:00 PM, MT September 26, 2006
Qwest Response to CLEC Comments (if applicable)	Available October 11, 2006 <a href="http://www.qwest.com/wholesale/cmp/review_archive.html">http://www.qwest.com/wholesale/cmp/review_archive.html</a>
Proposed Effective Date	October 26, 2006

If you have any questions on this subject, please submit comments through the following link: <http://www.qwest.com/wholesale/cmp/comment.html>.

Sincerely

Qwest Corporation

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

If you would like to unsubscribe to mailouts please go to the "Subscribe/Unsubscribe" web site and follow the unsubscribe instructions. The site is located at:

<http://www.qwest.com/wholesale/notices/cnla/maillist.html>



**Announcement Date:** October 20, 2006  
**Effective Date:** Immediately  
**Document Number:** PROS.10.20.06.F.04281.Retract\_CFA\_P&I\_OvrvwV91  
**Notification Category:** Process Notification  
**Target Audience:** CLECs, Resellers  
**Subject:** CMP – Retract Provisioning and Installation Overview - V91.0  
**Level of Change:** Level 1

On October 20, 2006, Qwest is providing this notification to retract the Level 3 Notice PROS.09.11.06.F.04161.P\_and I\_Overview\_V91 which was announced on September 11, 2006. This proposed documentation update was to the Provisioning and Installation Overview PCAT. Qwest received a CLEC request to change the disposition of this notification to a higher level. To allow time to work on this issue, Qwest issued a Delayed Response to Comments via Notice PROS.10.11.06.F.04254.DelayResp\_Prov\_InstallV91 on October 11, 2006. After discussing the issues in the monthly CMP meeting on October 18, 2006, an agreement was reached between Qwest and the CLEC community to retract this proposed change and to send an internal and external MCC to reinforce the “Verbal supplement for CFA slot change on the Due Date” process.

The proposed updates were associated with a change to verbal supplement for CFA slot changed on the due date. In the Provisioning Points of Interface section under Provider Initiated Activity (PIA), Qwest was going to provide additional language which describes the Qwest and CLEC responsibilities for CFA or slot changes.

The current version of the Provisioning and Installation Overview will remain operational and the document can be found on the Qwest Wholesale Web Site at this URL:

<http://www.qwest.com/wholesale/clecs/provisioning.html>

**Comment Cycle:**

No formal comment cycle applies. CLECs who feel the change(s) described in this Level 1 notification alter(s) CLEC operating procedures should immediately contact the Qwest CMP Manager, by e-mail, at [cmpcr@qwest.com](mailto:cmpcr@qwest.com).

Sincerely

Qwest Corporation

Note: In cases of conflict between the changes implemented through this notification and any CLEC

interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

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October 26, 2006

Bonnie Johnson  
 Oregon Telecom Inc  
 730 2nd Ave. South Suite 900  
 Minneapolis, MN 55402  
 bjjohnson@eschelon.com

TO:Bonnie Johnson

**Announcement Date:** October 26, 2006  
**Effective Date:** November 1, 2006  
**Document Number:** PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA  
**Notification Category:** Process Notification  
**Target Audience:** CLECs, Resellers,  
**Subject:** MCC - Verbal supplement for CFA slot change on the Due Date

**Summary of Change or Description of the Activity:**

On October 26, 2006, Qwest will send an MCC notice for Verbal supplement for CFA slot change on the Due Date. This MCC becomes effective on November 1, 2006.

Qwest recently proposed PCAT language to the Provisioning and Installation Overview which was intended to remind CLECs to check their CFAs before assigning them and to clarify that only one (1) verbal supplement for CFA slot change was to be accepted on Due Date (DD). However in discussion with the CLEC community at the Monthly CMP Meeting held on October 18, 2006, this language was not adopted. Instead it was agreed to retract and distribute a MCC both internally and externally to reiterate the current process. See PROS.10.20.06.F.04281.Retract\_CFA\_P&I\_OvrwV91 which was sent on October 20, 2006.

The "Verbal supplement for CFA process" is intended to allow one (1) verbal supplement on DD. However, as customer service is always Qwest priority, in order to maintain the best experience from a customer service perspective, Qwest Testers should remain flexible and use their best judgment to determine if it is reasonable to expect the next CFA change to resolve the issue. If not, the subsequent CFA change should be refused and the CLEC should be pointed to the supplemental process. If Qwest receives frequent attempts from a CLEC to verbally request numerous changes on DD before a good CFA is found, the Tester should post a Customer Jeopardy to the order and contact the CLEC's Service Manager to inform them of the situation.

Related information can be found on the Qwest Wholesale Web site at this URL:  
<http://www.qwest.com/wholesale/clecs/provisioning.html>

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager, Mary Dobesh on (801) 239-5335. Qwest appreciates your business and we look forward to our continued relationship.

Sincerely,

Qwest Corporation

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of



such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

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cc: Patty Hahn  
Mary Dobesh

Qwest Communications 1600 7th Ave Room 1806 Seattle WA 98008

From: Johnson, Bonnie J. [email redacted]

To: Johnson, Bonnie J. [Qwest CMP CR email redacted]

CC: Johnson, Bonnie J. Isaacs, Kimberly D.

Subject: FW: Process Notice: Interconnection: GN: CMP - MCC Verbal SUPP for CFA on DD: Effective 11-1-06

Sent: Tue 10/31/2006 3:53 PM

Eschelon asks Qwest to retract PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA Title: MCC - Verbal supplement for CFA slot change on the Due Date as an MCC type notice because this is a change in process. An MCC should not be used for changes in process. If Qwest desires a change in process, Qwest should submit a level 4 CR. Eschelon does not agree that the change should be made. Eschelon (Kim) said in the CMP meeting Eschelon would review. Eschelon has done so and this is Eschelon's response.

Qwest issued PROS.09.11.06.F.04161.P\_&I\_OverviewV91 (change to the provisioning and installation PCAT) limiting verbal CFA changes on the day of cut to one per circuit. Eschelon requested a change in disposition to a level four CR because Qwest was attempting to change an existing process. When Qwest and CLECs discussed Eschelon's request in the October CMP meeting, Qwest comments included "Cindy stated that the notice was not intended to change the process; it is only to limit a verbal CFA change to one." Limiting CFA changes to one per circuit on the due date is a change in a process, because Qwest has been providing multiple CFA changes.

CR 5548229 was implemented and completed in August of 2002. Although Qwest is now claiming that Qwest had always intended to limit CFA changes to one per circuit, since the process was implemented **more than four years ago**, Qwest has been performing multiple CFA changes for CLECs. CR 5548229 and the Qwest PCAT do not limit verbal CFA changes on the due date to one per circuit. In fact, an example used for purposes of implementing the CR contains multiple changes to one CFA. (See [http://www.qwest.com/wholesale/cmp/archive/CR\\_5548229.htm](http://www.qwest.com/wholesale/cmp/archive/CR_5548229.htm)). Therefore, it is clear from the face of the CR's status history that the intent was not to limit this to one. As stated in the Qwest October 18<sup>th</sup> CMP meeting minutes: Eschelon (Kim) "stated that she understood the intent of the notice and stated that Qwest may believe that the process was set-up as 1 verbal CFA. Kim stated that in reality, that is not the process that Qwest and the CLECs are following. Kim noted that in practice, multiple CFA changes are allowed. Kim stated that this notice is limiting the existing process and believes that it should be a Level 4 change." While Eschelon was willing to acknowledge that Qwest CMP representatives may now believe that was the intent, Eschelon was clear in saying it was not. Four years of experience and the multiple changes example in the status history shows that the limit is not current process. If Qwest's intention had been to limit CFA changes on the due date to one, Qwest would have issued its "clarification" immediately after the CR was implemented in August of 2002. It did not do so, because that was not the intent. The current process used by Qwest and the CLECs has been in place for over four years. If Qwest wants to change it, Qwest needs to follow the CMP Document and issue a level 4 CR, to which Eschelon will object.

Thanks,

Bonnie Johnson  
Director Carrier Relations  
Eschelon Telecom Inc.

[contact information redacted]

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**From:** [Qwest mailouts2 email redacted]

**Sent:** Thursday, October 26, 2006 3:16 AM

**To:** Johnson, Bonnie J.

**Subject:** Process Notice: Interconnection: GN: CMP - MCC Verbal SUPP for CFA on DD: Effective 11-1-06