WUTC Docket No. UT-033044
Eschelon Responses to Hot Cut Bench Requests
November 17, 2003

BENCH REQUEST NO. 32:

Question:

Describe the hot cut process currently used to transfer lines from Qwest switches to your facilities.

Answer:

Eschelon's process for transferring a customer's line(s) from a Qwest switch to an Eschelon switch generally includes the following steps. The other steps to switch a customer are not discussed here because the question asks only about the hot cut piece of the process.

Step 1: Verification of dial tone 48 hour prior to cut

A. If Qwest verifies dial tone, the cut proceeds to Step 2.
B. If Qwest fails to detect dial tone, Qwest sends an email ("48 Hour Notice") to Eschelon per the Qwest documented process. Eschelon typically takes the following steps to resolve the problem:

    1. Verify that switch translations have been completed. If not, Eschelon builds translations. If Qwest verifies dial tone, the cut proceeds to Step 2.
    2. Verify that the Connecting Facilities Assignment ("CFA") on the Firm Order Confirmation ("FOC") matches the Line Equipment Number ("LEN"). If not, Eschelon changes the LEN in its switch. If Qwest verifies dial tone, the cut proceeds to Step 2.
    3. If the CFA on the FOC matches the LEN, Eschelon contacts Qwest to verify the accuracy of the 48 Hour Notice. If Qwest verifies dial tone, the cut proceeds to Step 2.
    4. If there is still no dial tone, Eschelon dispatches an Eschelon technician to the collocation to verify dial tone and wiring to the ICDF. If the Eschelon technician verifies a trouble on Eschelon's side, Eschelon will correct. If the correction cannot be made quickly enough, then Eschelon will use

Qwest's documented day-of-cut CFA change process. If Qwest verifies dial tone, the cut proceeds to Step 2.

5. If the Eschelon technician verifies that the trouble is on Qwest's side, Eschelon will request that Qwest correct the problem prior to the due date for the hot cut. If Qwest fails to correct the problem by the due date, Eschelon will change the CFA so as not to delay the cut. Once Qwest verifies dial tone, the cut proceeds to Step 2.

Step 2: Verification of dial tone 1 hour prior to cut

A. If Qwest verifies dial tone, the cut proceeds to Step 3.
B. If Qwest fails to detect dial, Qwest calls Eschelon ("1 Hour Notice") and Eschelon conducts the following steps:

1. Verify that switch translations have been completed. If not, Eschelon builds translations. If Qwest verifies dial tone, the cut proceeds to Step 3.
2. Verify that the CFA on the FOC matches the LEN. If not, Eschelon would change the LEN in its switch. If Qwest verifies dial tone, the cut proceeds to Step 3
3. If the CFA on the FOC matches the LEN, Eschelon contacts Qwest to verify the accuracy of the 1 Hour Notice. If Qwest verifies dial tone, the cut proceeds to Step 3.
4. If there is still no dial tone, Eschelon will ask Qwest to verify that the coil is okay. A bad coil could be the reason there is no dial tone. If this does not resolve the problem, Eschelon will change the CFA under Qwest's documented process for day-of-cut CFA change so as not to delay the cut. Once Qwest verifies dial tone, the cut proceeds to Step 3.

Step 3: Qwest begins the transfer of the customer

A. Eschelon calls the Qwest tester assigned to the hot cut to authorize Qwest to start the hot cut.[1]
B. Qwest performs cut procedures.

[1] At times Qwest will call Eschelon and ask Eschelon to start the cut early. In many cases, Eschelon will agree. Even though Eschelon has paid a higher rate for a coordinated hot cut, in these instances, Eschelon is not receiving a coordinated hot cut and is overpaying.

C. When the cut is completed successfully, the hot cut process requires the Qwest tester to notify Eschelon that the cut is complete. If Qwest affirms that the cut has been completed successfully, the cut proceeds to Step 4.
D. If the Qwest tester fails to notify Eschelon that the cut has been completed in a reasonable period a time[2], Eschelon may call Qwest to obtain the status of the cut. If Qwest has simply failed to notify Eschelon of completion and Qwest states that the cut has already completed successfully, the cut proceeds to Step 4.
E. If Qwest identifies a problem (via an Eschelon call to Qwest or a Qwest call to Eschelon), Eschelon will request that Qwest identify the problem, describe how Qwest will fix the problem, and determine how long it will take for Qwest to fix the problem and complete the cut.
F. If the identified problem is Qwest-caused, Qwest may dispatch a Qwest technician or complete central office work as appropriate. Once Qwest affirms that the cut has been completed successfully, the cut proceeds to Step 4.
G. If the identified problem is Eschelon-caused, Eschelon will change the CFA under Qwest's documented process for day-of-cut CFA change so as not to delay the cut. Once Qwest affirms that the cut has been completed successfully, the cut proceeds to Step 4.
H. If at any time during the cut process, if the impact to the end-user is too great, Eschelon will request that Qwest cut the customer back to Qwest and resolve the issue before proceeding with the cut again.

Step 4: Eschelon verifies that the cut is complete

A. Once Qwest informs Eschelon that the cut is complete, Eschelon tests each line in the Eschelon switch. This process includes a test of intra-switch calling. If no problems are identified, the cut proceeds to Step 5.
B. If problems are identified, Eschelon contacts the Qwest CLEC Coordination Center ("QCCC"). The following are examples of problems/resolutions based on what the Eschelon tester may see on the line test results:
    1. If no dial tone is present at the ICDF, Eschelon would ask that a Qwest Central Office Technician ("COT") isolate the problem. If the problem is identified on Eschelon's side of the Point of Interconnection ("POI"), a

[2] Eschelon defines a reasonable completion time as five minutes per line. Therefore, the amount of time that passes before Eschelon will inquire varies by the number of lines in the hot cut.

day-of-cut CFA change would be initiated as described above and the cut proceeds to Step 5.

2. If there is dial tone at the ICDF, Eschelon would ask that a Qwest COT check for dial tone at the cable head.
    a. If there is no dial tone at the cable head, a central office wiring problem is indicated as the cause of no dial tone. Once Qwest identifies and resolves this problem, the cut proceeds to Step 5.
    b. If there is dial tone at the cable head, the problem is indicated as being caused outside the central office and a Qwest technician is dispatched. Once Qwest identifies and resolves the problem, the cut proceeds to Step 5.
    c. If Qwest finds dial tone to the customer's demarc and verifies that the circuit was reused properly, the problem may be identified as Customer Premise Equipment ("CPE"). Eschelon will attempt to resolve the problem with the end user.

Step 5: Eschelon ports the customer's number(s) to the Eschelon switch.

A. Eschelon logs into Verisign[3] and searches for the end user's number(s).
B. Eschelon verifies that each number is ready to activate and will point to the correct Eschelon Local Routing Number ("LRN").
    1. If the LRN is incorrect, Eschelon will modify the subscription[4] in Verisign.
    2. If the numbers are not ready to port because of, for example, subscription problems[5], manual authorization from Qwest's Customer Service Inquiry and Education Center ("CSIE") is needed to port the numbers. Eschelon asks Qwest to open an escalation ticket. Only when Qwest authorizes the port can Eschelon port the number.
C. Once the number is activated in Verisign, the Eschelon tester verifies that the port has completed.
    1. Eschelon will "refresh" the subscription in Verisign to ensure that the number is in "Active" status.

[3] Verisign is the electronic interface that Eschelon uses to interface with the Number Portability Administration Center ("NPAC").
[4] A customer's subscription contains information on the number being ported (e.g., the name of the customer's originating carrier and the carrier to which the number is being ported.).
[5] Subscription problems include, but are not limited to, instances where Qwest has not supplied the port information to NPAC or Qwest has improperly populated the Service Profile Identifier ("SPID").

2. If the status is returned as "Sending" or "Pending", the port has not yet completed. These statuses represent a "slow" port.[6] If this status continues, Eschelon will generally contact Verisign for an update within 30 minutes to an hour. If Verisign indicates that the port is slow, nothing can be done. During this time, end users will be unable to receive calls from all other carriers (i.e., all callers other than other Eschelon customers).
3. If the status is returned as "DL Partial Fail", the port has not yet completed because another provider has not recognized the port of the number. "DL Partial Fail" status can sometimes remain for hours (or even days). No modifications to the number can be made while it is in this status. Furthermore, it is Verisign's policy to wait at least four hours before manually intervening to push the port through or re-broadcast the number.
    a. Eschelon investigates each "DL Partial Fail" to determine from which carrier(s) the end user will not be able to receive calls. This is determined by running a query in Verisign to identify which provider(s) has/have failed to recognize the port. Calls originating with these providers will not go through to the end user.
    b. Receipt of "DL Partial Fail" related to a significant carrier (e.g., Qwest or a major wireless carrier) will require Eschelon to determine whether to go ahead with additional scheduled cuts because it is known that any other hot cuts initiated likely will result in additional end users not being able to receive calls from the affected carrier. As pushing-out a cut at the last minute can often result in loss of service, either choice is risky.

Step 6: Eschelon tests the customer's service after porting is completed

A. Once the numbers have been successfully ported to Eschelon's switch, Eschelon tests the end user's service by placing test calls to the customer to determine things like whether:

1. Calls are terminating to the correct customer equipment.
2. The customer is able to dial long distance.
3. All features are programmed and operable.

[6] One potential cause of a "slow" port would be if a large port is occurring simultaneously. This can slow down the NPAC database.

4. The customer is able to send and receive faxes.
5. The customer can run a credit card transaction (when applicable).
6. The customer's alarm service is able to call (when applicable).

B. If problems are identified as a result of these test calls, Eschelon will generally follow the trouble shooting scenarios described in Step 4 above.

Step 7: Eschelon closes the conversion with Qwest

Once Eschelon has successfully completed testing with its end user, the hot cut is accepted. Eschelon accepts the hot cut by calling the Qwest tester and requesting that the tester close the conversion.

Response Prepared by: Ray Smith 612.436.1606

WUTC Docket No. UT-033044
Eschelon Responses to Hot Cut Bench Requests
November 17, 2003

BENCH REQUEST NO. 33:

Question:

Please list each task that is part of Qwest's current hot cut process. For each task, please provide the following information:

(a) the average time it takes to complete the task;
(b) the typical occurrence of the task during the process;
(c) the labor rate for the task; and
(d) the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

Answer:

a. The estimates of the time required to complete each task identified in Eschelon's response to Bench Request No. 32 are contained in the attached Table One. These preliminary estimates are based SME analysis of the Eschelon hot cut process on SME analysis prepared in the ordinary course of business of the Eschelon hot cut process and Eschelon's Qwest Report Cards.[7] For Step 3, Eschelon's Qwest Report Cards indicate that Qwest required an average of 8.74 minutes per line to complete the Qwest portion of a hot cut in the first eight months of 2003. A typical Eschelon customer has 4 to 5 lines. Over this time period in Washington, the average number of lines per customer was 3.99. Thus, the average amount of time that a customer was without service due solely to Qwest was 34.87 minutes.

[7] Eschelon provides Qwest with a monthly report on its performance in 9 key areas. Performance measure E-2 measures how long it takes Qwest to complete its portion of a hot cut and notify Eschelon that the telephone numbers can be ported. In the Report Card, Eschelon provides aggregated performance across Arizona, Colorado, Minnesota, Oregon, Utah, and Washington. For purposes of this response, Eschelon reports Washington specific performance. In response to Bench Request No. 38, Eschelon created Exhibit 3. Exhibit 3 documents Qwest hot cut performance in Washington from January 1, 2003 to August 31, 2003.

b. The probability that each task occurs is identified in Table One. For purposes of answering this question, Eschelon assumes that action is required only if Qwest fails to verify dial tone in either Step 1, Step 2, or both. The estimates are based a review of Coordinated Cuts completed August 2003 through October 2003.

c. Eschelon estimates that the loaded labor rate for each task in the table is ****proprietary****/hour.

d. The common overhead loading associated with the labor rate is approximately ****proprietary**** percent.

Response Prepared by: Ray Smith 612.436.1606

TABLE ONE: Time Estimates for Completion of a Hot Cut

Step	**Probability of the Occurrence of this task**	**Average Time to Complete this task**	**Weighted Average Time to Complete Task[8]**
1. Verification of dial tone 48 hour prior to cut indicates trouble and requires troubleshooting[9]	25 percent	15 minutes	4 minutes
2. Verification of dial tone 1 hour prior to cut indicates trouble and requires troubleshooting[10]	4 percent	15 minutes	1 minute
3. Qwest begins the transfer of the customer	100 percent	34.87 minutes	35 minutes
4. Eschelon verifies that the cut is complete	100 percent	15 minutes	15 minutes
5. Eschelon ports the customer's number(s) to the Eschelon switch.	100 percent	10 minutes	10 minutes
6. Eschelon tests the customer's service after porting is completed	100 percent	15 minutes	15 minutes
7. Eschelon closes the conversion with Qwest	100 percent	2 minutes	2 minutes
Total			**82 minutes per order (or, approximately 21 minutes per line)**

[8] Weighted average completion times are rounded to the nearest integer.
[9] For purposes of this response Eschelon has not included Eschelon dispatch activities in the average time or probability of occurrence.
[10] Assuming Qwest has completed the verification of dial tone task 48 hours prior to the hot cut, most problems should be avoided. If Qwest's 48 Hour verification process is not followed, or is followed poorly, the probability of (and the corresponding time devoted to) this activity will increase.

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Eschelon Responses to Hot Cut Bench Requests
November 17, 2003

BENCH REQUEST NO. 34:

Question:

Describe a batch hot cut process that you would implement to meet the FCC's requirement to establish a batch hot cut process. Please include an estimate of the maximum number of lines that should be processed in each batch.

Answer:

The FCC has found that CLECs are impaired by ILECs' current hot cut process. State commissions are opening proceedings to develop a batch hot cut process. The industry's development of what a batch hot cut process would look like is in its initial stages. Qwest's does not provide a batch hot cut process. In terms of what a batch hot cut should look like, at this stage Eschelon can identify only general characteristics. These characteristics may change as additional discussions occur within the industry.

1. Qwest's current Project Coordinated Installation is not a batch process

Qwest's current Project Coordinated Installation allows a CLEC to order a coordinated installation when ordering 25 or more DS0 Unbundled Local Loops per customer.[11] This process is not a batch process. For example, the threshold is on a customer-by-customer basis.[12] This means that if a CLEC wanted to cut over 100 customers, each with 5 lines, none would be eligible for Project Coordinated Installation.

[11] Qwest's process is described at: http://qwest.com/wholesale/pcat/unloop.html

[12] Qwest's documentation of this process is quite deficient. For that reason, it is very difficult to determine when and how this process can be used. Qwest's description states only that: "If you relate Purchase Order Numbers (PON) and associate them to a Project Identification Code, in the PROJECT field on the LSR, or if the LQTY field on the LSR has 25 or more loops, the service request will be handled as a project by the center responsible for handling your account. The installation guidelines for projects are negotiated on an Individual Case Basis (ICB) based on the request." See id. A batch process cannot have ICB terms.

Beyond this critical flaw, Qwest performance under a Project Coordinated Installation is not reported under Qwest's performance measures. Qwest in fact proscribes that installation guidelines are to be negotiated on an ICB basis.[13] If Qwest takes all day to complete a project, there is no consequence to Qwest. Of course, CLEC's end users would suffer serious consequences with an all-day cut.

2. A batch hot cut process needs to address the significant limitations of Qwest's current process

At this stage Eschelon has been able to identify several issues that the batch hot process may need to address. Other issues may also need to be addressed.

a. CLECs should have flexibility in the submission and implementation of a batch hot cut.

- CLECs should be able to submit a batch in an efficient manner. This will likely require the development of new ordering capabilities. CLECs sending individual LSRs for multiple orders should not be considered a "batch."
- CLECs should be able to specify the order in which lines are cut over. In some cases a single customer has multiple Customer Service Records ("CSRs"). For example, a five-line customer could have 3 lines on one CSR and 2 on another CSR. Unless these two orders were batched sequentially, the customer could have an all-day hot cut. If the lines on only one CSR were cut, features such as hunting would not work because the customer's lines would be on different switches. There is also the risk that the lines on the second CSR ported may need to be cut back to Qwest. Again, certain features would not be available. In this instance, however, the loss of features would last much longer, because there might be no way to cut back the first lines because that hot cut has already completed. Factors like this should be addressed in the development of the batch process to minimize the risk of adverse end user impacts.
- CLECs may need to specify when each cut over will occur so that they can plan. For example, depending on the batch hot cut design, lines with alarm circuits may require someone to be at the customer premise during the cut. In addition, a CLEC would not be able to test and accept a large number of loops in the one-hour currently allowed by Qwest.

[13] See id.

b. The batch process should not adversely impact customers.

In order to ensure that end users are not adversely impacted by the batch hot cut process, many considerations will need to be taken into account. For example:

- Qwest would need to develop a mechanism for the creation of accurate service orders from the batch. Creating accurate service orders should not be a manual process because of the likelihood of manual entry mistakes that would impact end users. Batch hot cut orders should flow-through.
- Qwest would need to develop an escalation process for the batch hot cut. Multiple escalation tickets during a batch could be unmanageable particularly if no clear priority for resolution exists.
- Qwest would need to establish a process to address individual customer outages within a batch containing multiple customers. For example, if one end user in the batch has problems serious enough to warrant the cancellation of its cut would Qwest reverse that particular cut and reschedule while continuing with the remainder of the batch?
- Qwest would need to address the ability to "snap-back" a single line or a single customer in the batch. A snap-back is used if service problems are not identified until after the cut is accepted. While day-of-cut testing helps to avoid this in most cases, there are times when problems are not identified until after the cut completes. A snap-back results in the customer's service being converted back to Qwest until the problem can be resolved.

c. The batch hot cut process should be developed in a manner that accounts for all industry participants.

The entire industry will need to sort out many things in regard to an effective batch hot cut process. At this early point in the process, Eschelon has identified a couple of questions for the industry to consider.

- Will a batch contain lines from both Qwest and CLECs?
- How will prioritization be determined so that multiple carriers can submit a batch cut while not freezing out non-batched cuts or freezing out particular central offices?

- If restrictions are placed on CLECs ability to complete hot cuts in any wire center at any time, how will comparable restrictions be applied to Qwest retail?

d. The batch hot cut process should not degrade performance in other areas (e.g., DS1 capable loop installation or non-batched cuts).

To ensure that the batch hot cut process does not degrade performance, Qwest will need to develop new procedures. For example:

- An effective batch hot cut process may require Qwest to identify and dedicate Qwest personnel to the batch hot cut process.
- Priority levels may need to be designated so that CLECs are aware of which services are in jeopardy due to the processing of a batch hot cut.
- CLECs will need to be able to order the services in the manner they currently do without degradation in quality as a result of the introduction of a batch hot cut process. Qwest should not be allowed to meet its legal obligation to provide a batch hot cut process by delivering a lower level of quality in any area.

e. The batch hot cut process should develop efficiencies that reduce costs

The FCC has identified that the batch hot cut process should result in efficiencies that reduce costs. If the efficiencies gained in the batch hot cut process can translate to the individual hot cut process, costs for the latter process should also be reduced.

f. Qwest's performance metrics should measure performance of batch hot cuts

As a batch hot cut process is developed, Qwest's performance measures need to be developed simultaneously to account for the new process so that Qwest's performance can be evaluated.

g. The batch process should be able to handle customers served over pair gain, IDLC facilities, or remote terminals

The batch hot cut process needs to address the barriers and issues presented by pair gain, IDLC facilities, or remote terminals. CLECs, unlike Qwest, currently

have to identify and address these situations, generally, on a line-by-line basis. A batch-appropriate process is needed.

Response Prepared by: Ray Smith 612.436.1606

WUTC Docket No. UT-033044
Eschelon Responses to Hot Cut Bench Requests
November 17, 2003

BENCH REQUEST NO. 35:

Question:

Please list each task that is part of the batch cut process described in your response to Bench Request No. 35, above. For each task, please provide the following information:

b. the average time it takes to complete the task;
c. the typical occurrence of the task during the process;
d. the labor rate for the task; and
e. the common overhead loading associated with the labor rate.

Please identify the sources of the data supporting your answers, including, but not limited to, time/motion studies and SME analysis.

Answer:

a. Until a process is developed, Eschelon is unable to answer this question except to state that to the extent any steps remain the same, the answers provided to Bench Request 33 apply.

b. Until a process is developed, Eschelon is unable to answer this question except to state that to the extent any steps remain the same, the answers provided to Bench Request 33 apply.

c. Please see Eschelon Response to Bench Request 33.

d. Please see Eschelon Response to Bench Request 33.

Response Prepared by: Ray Smith 612.436.1606

WUTC Docket No. UT-033044
Eschelon Responses to Hot Cut Bench Requests
November 17, 2003

BENCH REQUEST NO. 36:

Question:

Beginning on January 1, 2003, please provide the average total cost per line that you incurred to manage and participate in Qwest's hot cut process, including, but not limited to, Qwest's non-recurring charges, for lines used to service residential and business mass-market customers in Qwest's service territory within Washington State. If the average total cost per line discussed above is different for residential and business mass-market customers, please identify the average total costs separately.

Answer:

For Washington, the average cost per voice access line equivalent ("ALE") over the past 9 months was approximately ****proprietary****. This estimate includes the costs Eschelon incurs to manage and participate in Qwest's hot cut process but excludes acquisition related costs such as sales commissions, advertising, and bad debt expense. Switch costs, which are typically ****proprietary**** per port, are also excluded from this calculation. If the Commission wishes to include capital equipment costs, an additional ****proprietary**** would need to be added to the per line estimate above.

Eschelon serves only business customers and principally small business customers. A typical Eschelon customer has 4 to 5 lines for an average total cost per customer of approximately ****proprietary**** excluding capital equipment costs.

Response Prepared by: Ray Smith 612.436.1606

WUTC Docket No. UT-033044
Eschelon Responses to Hot Cut Bench Requests
November 17, 2003

BENCH REQUEST NO. 37:

Question:

If the Commission determines that competitive carriers are not impaired without access to switching in the mass-market, please identify, by Qwest wire center in Washington State, what monthly volumes of hot cuts would be required within the first 12 months after the effective date of the decision: (a) to migrate existing UNE-P customers to UNE-L or another form of service, and (b) to connect new customers in the ordinary course of business. Please provide supporting documentation for these volume estimates.

Answer:

a) Eschelon operates in 3 markets in the state of Washington (Seattle, Tacoma, and Vancouver). As of October 2003, Eschelon served approximately ****proprietary**** UNE-P[14] lines in Washington. Eschelon is unable to precisely determine in which wire centers each UNE-P customer is located. Qwest has this information. Eschelon previously submitted a Change Request ("CR") to the Change Management Process ("CMP") for Qwest to provide the Common Language Location Identifier ("CLLI") code on CLECs' wholesale bills in order to obtain this information for bill validation. This information would also allow Eschelon, as well as other CLECs, to report lines on a wire center basis. However, Qwest denied this CR. Therefore, Qwest should provide this information to the Commission as it declined to provide it to CLECs.

Exhibit 1 to this response is Qwest's Performance Indicator Definition ("PID") results for Eschelon for the percentage of circuits with trouble ("Trouble Rate" or "MR-8"). The Trouble Rate is calculated by dividing the number of Eschelon circuits with trouble in a given month by the total number of Eschelon circuits in service. Thus, the sum of the denominators for MR-8 for UNE-P POTS, UNE-P

[14] In answering this question, Eschelon has included UNE-E, or UNE-Star as Qwest sometimes calls it, in the total number of UNE-P customers, as that is how Qwest reports UNE-P.

Centrex, and UNE-P Centrex 21 confirms Eschelon's volume of UNE-P lines in service.[15]

For purposes of estimating the volume of UNE-P that would need to be migrated if UNE-P were to be eliminated, it is important to note that Eschelon anticipates that it will continue to submit additional UNE-P orders.[16] This means that the base of UNE-P lines that would need to be migrated in the event UNE-P is eliminated could be much higher. Providing a precise estimate of how many will need to be migrated depends on many unknown factors. For example:

- Which network elements will be available as a result of TRO proceedings?
- How many UNE-P customers will migrate to other Eschelon products or move to other carriers?[17]
- How many UNE-P customers will be willing to submit to a hot cut process if they believe their service will be disrupted?
- How many UNE-P customers are served by pair gain, Integrated Digital Loop Carrier or Remote Terminals such that a hot cut may not be permitted?
- Will capital be available to expand networks?

Eschelon does not interpret the TRO to require the migration to occur within the first 12 months after the effective date of any decision to eliminate UNE-P.

b. Eschelon serves customers via analog loops, UNE-P, and DS1 capable loops.[18]

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[15] Eschelon's and Qwest's numbers will vary slightly as Eschelon and Qwest disagree on what is and what is not a UNE-P line for purposes of reporting as well as due to potential differences in timing when each company counts lines (e.g., the beginning versus the end of the month).

[16] It may be useful to understand that Eschelon generally uses UNE-P in two circumstances. First, Eschelon uses UNE-P to serve its former resale lines. Eschelon commenced business in Washington as a reseller. Eschelon began a project with Qwest to migrate those lines to UNE-L in calendar year 2000. Many customers experienced service problems as a result of the migrations and Eschelon discontinued the effort. Those resale lines were converted to UNE-P, a conversion that is less-customer affecting than a hot cut. Generally, new UNE-P installations do not occur in "on net" areas, i.e. those areas in which Eschelon is able to serve customers with its network facilities. Second, Eschelon uses UNE-P to serve "off net" customer locations, i.e. those locations that cannot be served by Eschelon's own switch. Eschelon does not actively market to "off net" customers. However, many of Eschelon's customers have multiple locations and most customers insist upon a single provider for all their locations. Rather than lose such business, Eschelon will serve the customer via UNE-P.

[17] To the extent an Eschelon UNE-P customer moves to another UNE-P carrier, that customer would still need to be migrated to a UNE-L with a hot cut, of course.

[18] Eschelon also uses DS1-capable Enhanced Extended Links ("EELs").

Eschelon does not currently use a hot cut process for DS1 capable loops. Eschelon orders a new loop (i.e., there is no reuse of facilities). If Eschelon were to start using hot cuts for DS1 capable loops, its volume of hot cut activity would increase whether or not the availability of UNE-P changes. However, for purposes of this answer, Eschelon only estimates future volumes of analog loops and UNE-P.

1. Analog loops

Once again, it is difficult to estimate future volumes given the uncertainties such as those identified above. In addition, Qwest policy changes can dramatically affect CLEC ordering. For example, Qwest, without notice to CLECs, improperly refused to provision DS1 capable loops and EELs in June, July, and August 2003 without "special construction" where no construction was required. This policy change resulted in significant costs and lengthy delay in delivering the facilities to the customer. Had Qwest not been forced to reverse the policy changes, CLECs would have been required to increase the volume of analog loops (and hot cuts). Should Qwest attempt to revert to this policy, or should it institute other similarly anti-competitive practices, any estimates provided here will most certainly underestimate future volumes.

One estimate of the volume of future analog loop orders is the forecast provided to Qwest by Eschelon. Eschelon's 4th Quarter 2003 analog loop forecast is attached as Exhibit 2 to this response. This forecast estimates that a total of ****proprietary**** unbundled analog loops will be ordered each month in Washington. These estimates are disaggregated by wire center.

2. UNE-P

Eschelon estimates that it will order on average ****proprietary**** UNE-P lines per month in Washington while UNE-P remains available based on historical trends and Eschelon's current sales force. Should UNE-P be eliminated everywhere Eschelon operates and that Eschelon is able to raise additional capital to build collocations to serve these UNE-P customers, these customers would also have to be served by an analog loop.

3. Total

Adding estimated UNE-P lines to the forecasted analog loop volume provides an approximation of the number of hot cuts that Qwest might need to conduct for Eschelon alone if UNE-P were eliminated everywhere Eschelon uses UNE-P to serve customers. Using this method, approximately ****proprietary**** hot cuts a month would be required to connect customers in the ordinary course of business for Eschelon alone.

Response Prepared by: Ray Smith 612.436.1606

WUTC Docket No. UT-033044
Eschelon Responses to Hot Cut Bench Requests
November 17, 2003

BENCH REQUEST NO. 38:

Question:

Please describe any circumstances in which you believe Qwest has performed deficiently in providing you with hot cuts in Washington State since January 1, 2003. Please provide a complete description of all facts that you rely upon as well as documents that support your assertion.

Answer:

Qwest deficiencies in providing hot cuts are significant. For example, two general categories of Qwest's deficiencies are discussed here. First, Qwest delays completing hot cuts such that Eschelon's customers are out of service far too long. Second, Qwest's hot cuts cause service-affecting problems for end users.

Qwest unacceptably delays completion of hot cuts

Eschelon's Report Card indicates that Qwest took an average of 34.87 minutes to complete Task #3 identified in the Response to Bench Request No. 33. On a per line basis, Qwest took 8.74 minutes to complete its task. See Exhibit 3.

Qwest's PID reports indicate that, on a per line basis, the time to physically complete the lift-and-lay portion of the hot cut has been on average 3 minutes. See Exhibit 4. Qwest, unlike Eschelon, does not include in this interval the time Qwest takes to inform the CLEC that the cut is completed so that the numbers can be ported. Qwest's failure to account for the time that the hot is completed (but the Qwest technician is the only one who knows about it) means that Qwest's performance measures do not account for all the time that the customer is impacted by Qwest actions. As described in Eschelon's response to Bench Request No. 32, until Qwest informs the new carrier that Qwest has completed the hot cut, the new carrier won't know to port the numbers. And until the numbers are ported, customers can't receive calls. This is a significant issue to customers. It is certainly important to small business customers such as pizza shops, insurance agencies, and medical clinics that rely on incoming calls to conduct their business.

Considering both Eschelon's and Qwest's performance data together, one can infer that a Qwest technician waits 5 to 6 minutes (on a per line basis) after the lift-and-lay is done to

inform Eschelon that the numbers can be ported.[19] For a 4-line customer, this means that there is at least an extra 25-minute period that the customer is unable to receive calls originated on the networks of every carrier besides Eschelon. In many cases, this extra 25-minute period would be even longer if Eschelon did not proactively call Qwest to ask whether the cut has been completed.

The quality of Qwest's hot cuts is unacceptable

Eschelon's Report Card also measures the percentage of customers that experience a service disruption within 30 days of converting to Eschelon. Eschelon reports this data monthly to Qwest for various products. Exhibit 5 shows Qwest's "New Service Quality" performance from January 2003 to August 2003. For this period of time, more than 6 out of every 100 customers served by analog loops experienced a Qwest-caused trouble during the first 30 days of service.[20]

It should be noted that Qwest also produces a measure of its "New Service Quality" called OP-5. Qwest's OP-5 measure, however, currently does not include all troubles that occur on the day-of-cut. Not surprisingly, because of this significant deficiency in Qwest's performance measurement, Qwest will report fewer new service quality troubles than Eschelon's customers actually experience. The Long-Term PID Administration ("LTPA") group, which includes Qwest, CLECs, and Commission staffs, has implemented changes to OP-5. Unfortunately, these changes have not been implemented yet and will only be available starting in February 2004. Until then, Eschelon's measure is the only measure that captures a customer's real world experience.

To illustrate the significant problems experienced by analog loop customers after conversion, consider that Qwest reports that a typical CLEC's analog loop had a trouble rate of 0.43 percent during the first 9 months of this year in Washington. See Exhibit 6. The differential between the trouble rates (6.37 minus 0.43) is a rough approximation of the customer impact of Qwest's hot cut performance. That is, for every 100 customers that submit to a hot cut, approximately 6 customers will have service quality degradation that they would not have had absent the hot cut—even at today's low volume of orders.

Qwest's inadequate hot cut performance under today's low volumes will logically degrade if UNE-P is eliminated.

Qwest completes approximately 300 hot cut orders in a month for the entire state of Washington. See Exhibit 7. These orders represent less than 1000 loops per month. See Exhibit 8. If the volume of hot cuts increases due to the elimination of UNE-P, it is likely that both Qwest's timeliness and its accuracy will degrade further. In the event that UNE-

[19] This delay appears to occur because Qwest technician(s) decide to work on tasks not related to Eschelon's hot cut before contacting Eschelon.

[20] Eschelon reports the percentage of customers that do not experience trouble. The percentage of customers that did experience trouble is calculated by subtracting 93.63 from 100, or 6.37 percent.

P is eliminated, all carriers that use UNE-P today will need to conduct migrations and will need to order higher volumes of hot cuts each month for new customers. If there are just 4 other UNE-P carriers with profiles similar to Eschelon, the migrations of just these carriers would represent ****proprietary**** months of Qwest's current activity.

Eschelon's hot cut activity accounts for about ****proprietary**** of Qwest's total volume in Washington.[21] As mentioned above, Eschelon generally orders UNE-P where it does not have collocations and orders hot cuts where it does. Thus, Qwest technicians may have performed very few hot cuts for Eschelon in the wire centers where Eschelon's UNE-P customers are located. If other carriers order hot cuts in the same wire centers as Eschelon, Qwest's experience performing hot cuts in other wire centers may be negligible. Given Qwest's limited experience, it is reasonable to expect longer cuts and more problems if UNE-P is eliminated in such wire centers.[22]

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[21] This ratio can be calculated by comparing Exhibit 4 to Exhibit 8.

[22] Even if Qwest's performance doesn't degrade the elimination of UNE-P could degrade hot cut performance in other ways. It is Eschelon's experience that when another CLEC conducts a migration, the number porting process can "slow down." This issue was briefly discussed in Eschelon's response to Bench Request No. 32. The likelihood that an increasing volume of hot cuts will degrade the porting portion of hot cut process is an additional significant concern