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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of those
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'S SECOND STATUS REPORT RE
AUTOMATION OF THE SUBLOOP
ORDERING PROCESS – JULY 12, 2002**

In its 28th Supplemental Order (*28th Order*), the Washington Utilities and Transportation Commission (Commission) required Qwest to “file a status report with the Commission on its efforts to automate the LSR process within 30 days after the service date of this Order, and every 3 months thereafter until the process is fully automated.” *28th Order* at ¶263. As detailed below, the Qwest ordering system can now accept a Local Service Request (LSR) for subloops.

1. In the workshop, the specific area of concern identified by AT&T was the ability to order and obtain subloop elements in Multiple Tenant Environments (MTEs). In MTEs, the most frequently sought subloop element is “intra-building cable,” (IBC) or the wires inside the MTE itself, such as riser cable.

2. The Commission found that “[t]he LSR process for ordering subloops from Qwest is a manual process.” *28th Order* at ¶198. As a result, the Commission “urge[d] Qwest to automate the LSR process for subloop orders as soon as practicable.” *28th Order* at ¶103. As stated in the previous

1 status report, filed April 11, 2002, Qwest has already completed that work. However, AT&T had some
2 questions as it related to the documentation regarding the availability of ordering subloops via the
3 Interconnect Mediated Access (IMA) system.

4 3. Specifically, AT&T requested that the ability to order subloops via IMA should be
5 identified in the IMA index of allowed UNEs. Qwest has made that change. The IMA index now
6 identifies that CLECs may submit LSRs in Washington for Unbundled Feeder Loop (UFL), Unbundled
7 Distribution Loop (UDL), and intra-building cable subloops using the automated IMA system. As a
8 result of discussions with AT&T, Qwest realized that the word “subloop” is not in the name of any of the
9 subloop elements. Therefore, if a CLEC searched for the word “subloop,” no reference in the IMA
10 index would be found. As a result of this documentation question, Qwest did add intra-building cable to
11 the list of elements and inserted the word subloop into the supporting sentence so that a search on the
12 word “subloop” with result in a positive finding for the CLEC.

13 4. To submit an LSR for intra-building cable, Qwest has created a defined process. That
14 process is detailed in Qwest’s Wholesale Product Catalog (PCAT). This subloop PCAT is currently on
15 the Qwest web site at <http://www.qwest.com/wholesale/pcat/subloop.html> and is attached hereto as
16 Attachment A. The PCAT outlines the steps that a CLEC must follow to submit a LSR for intra-building
17 cable. This specific process depends upon whether the LSR is sent before or after the CLEC meet point
18 information (Alternate Point of Termination (APOT)) circuit identification process has been completed. It
19 also describes how the CLEC should inform Qwest that it wants to run the jumper to provision the intra-
20 building cable subloop element. *See* Attachment A. The PCAT also contains a number of “hot links” to
21 other useful information about the ordering process generally. This detail includes, for example, “detailed
22 information regarding LSR field entry requirements” and how to access intra-building cable “prior to
23 completion of the MTE-POI.” *Id.* at 9-10.

24 5. The CLEC can submit the LSR to Qwest through either the IMA-GUI or IMA-EDI
25 interfaces, assuming the CLEC has completed the appropriate steps to update its IMA-EDI interface.
26 The LSR submitted can be for the subloop alone, or for subloop with number portability. In addition, the

1 CLEC can still fax a subloop request to (888) 796-9089.

2 6. CLECs order subloops in IMA using NC/NCI codes. The two standard NC/NCI
3 codes to order IBC in IMA had been loaded at the time of the previous report. However, Qwest further
4 clarified that it is in the process of reviewing whether additional codes for IBC will be necessary to allow
5 ordering of spectrum management related interfaces. Qwest did determine that additional codes may be
6 required in the future, and Qwest has an updated technical publication that identifies these additional
7 NC/NCI codes. The technical publication for subloops is 77405. The IMA system has also been
8 enhanced with the addition of the spectrum management NC/NCI codes as approved codes for the
9 ordering of subloops.

10 7. Thus, Qwest has automated the process for submitting LSRs to order subloop elements.
11 This process is already complete and available to CLECs today. Qwest believes that it has met the
12 requirements of the 28th Supplemental Order, and does not intend to file further status reports on this
13 issue.

14 Dated this 12th day of July, 2002.

15 QWEST CORPORATION

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17 _____
18 Lisa Anderl, WSBA # 13236
19 Qwest
20 1600 7th Avenue, Room 3206
21 Seattle, WA 98191
22 Phone: (206) 398-2500
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