

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation Into)	
)	DOCKET NO. UT-003022
U S WEST COMMUNICATIONS, INC.'s)	
)	
Compliance with Section 271 of the)	
Telecommunications Act of 1996.)	
_____)	
In the Matter of)	
)	DOCKET NO. UT-003040
U S WEST COMMUNICATIONS, INC.'s)	
)	
Statement of Generally Available Terms)	
Pursuant to Section 252(f) of the)	
Telecommunications Act of 1996.)	

**AT&T'S RESPONSE TO QWEST'S SECOND STATUS REPORT RE:
AUTOMATION OF THE SUBLOOP ORDERING PROCESS - JULY 12, 2002**

AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services on behalf of TCG Seattle and TCG Oregon (collectively "AT&T") hereby submit their Response to Qwest's Second Status Report Re: Automation of the Subloop Ordering Process stating as follows.

In Qwest's First and Second Status Report Re: Automation of the Subloop Process, Qwest has maintained that its system is fully automated, and appears to want to sweep this issue under the rug. (Qwest did not consult with AT&T before filing its latest pleading on these issues). As explained below, the process is not automated. However, AT&T has met with Qwest and hopes Qwest is true to its word that it will continue working with AT&T on the automation process. The history is as follows:

In the Commission's Twentieth Supplemental Order in Docket No. UT-003020 and Docket No. UT-003040, the Commission found, after citing provisions from the UNE Remand Order, that CLECs should not be required to submit LSRs.¹ However, in its Twenty-Eighth Supplemental Order in the same dockets, the Commission indicated that "in the interest of uniformity" it will require LSRs but that the LSR process should be automated.²

After Qwest filed its First Status Report, AT&T submitted its concerns that it could not even find the proper codes to order such intra-building cable subloops in both the IMA index and in Qwest's Wholesale Product Catalog. Thus, AT&T could not even perform the first step to determine if the LSR process was automated. The Commission indicated that it wished the parties to meet and then continue reporting to the Commission until the process was automated.

In early June, the parties met and discussed the ordering codes and other issues related to LSR automation. Qwest agreed to look at certain issues related to its process and also conduct training sessions on how they contemplated that the LSR process would work. Until such a meeting occurs, there is no way for AT&T's engineers to determine if the process is truly automated because without detailed instruction, they still do not know how exactly to utilize the system to order intra-building cable.

One thing that Qwest did reveal in its meeting with AT&T is that the basic details of a non-ported LSR process are still manual. Qwest indicated that for **every** on-premises wire subloop UNE that AT&T wished to order, Qwest personnel would need to manually type in the Remark Section of the LSR, "this is an Intra building cable" and

¹ See *Twentieth Supplemental Order* at p.67.

² See *Twenty-Eighth Supplemental Order* at p.28.

whether the CLEC wants “Qwest to dispatch a technician to run the jumper or if the CLEC will run the jumper.”³ This is precisely what AT&T complained about in the workshops; i.e. the process has no flow through because every LSR will have to be manually typed in as opposed to automatic computer entry.⁴ In fact, this is the only type of LSR that is going to require AT&T, and for that matter Qwest, to manually enter and review each LSR. Considering this type of LSR must be utilized every time AT&T wants to capture each individual pair of inside wire, it is hardly appropriate that the LSR be the only one that is manual.

In conclusion, Qwest had previously indicated that it would work with AT&T on the LSR process and AT&T anticipates further meetings. However, to the best of AT&T’s knowledge, the process is still manual. AT&T hopes that these issues will be worked out between the parties. However, until they are, AT&T requests that this Commission still require Qwest to report the progress of the automation process.

³ See WA Q 1021. Note that AT&T does not contemplate that it would ask Qwest to run the jumper except in extremely rare circumstances.

⁴ See Washington Transcript at p. 5567, 1.7-8.

Respectfully submitted this 23rd day of July, 2002.

**AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC. AND
AT&T LOCAL SERVICES ON
BEHALF OF TCG SEATTLE AND TCG
OREGON**

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