

Service Order Accuracy

A. Manual Service Order Accuracy

To ensure that CLEC customers and end users receive the best possible local service, Qwest has in the past addressed – and today continues to address – concerns raised in connection with its manual processing of LSRs. The majority of LSRs submitted by CLECs are designed to flow-through to Qwest’s Service Order Processor with minimal human intervention. However, under certain circumstances, LSRs drop out of the order flow and require manual handling.¹ When this occurs, trained Qwest Service Delivery Coordinators (“SDCs”) process those LSRs so that the requested services are provisioned to CLEC customers and end users on an accurate and timely basis.

Among the measures Qwest has adopted to ensure manual service order accuracy is the proposal (and interim adoption) of PID PO-20.² PO-20 evaluates the degree to which Qwest accurately processes LSRs that are electronically submitted but fall out for manual processing by measuring the percentage of Qwest service orders that are populated

¹ LSRs typically drop out for manual processing if, among other things, they are not flow-through-eligible or they contain an error.

² See “Summary of Notes on Qwest Regional Performance Results Report, September 2001 – August 2002,” September 24, 2002, at Attachment 2, *available at* www.qwest.com/wholesale/downloads/2002/020925/RGSep01-Aug02NotesSummary.pdf. See also Qwest II Declaration of Michael G. Williams, Commercial Performance, at ¶ 337, Exhibit MGW-Perf-2. For ease of reference, a current copy of PO-20 is attached hereto as Exhibit 1-1.

correctly, in specified data fields, within information obtained from CLEC LSRs.³ A complete description, as well as a copy, of PO-20 was included in the record in the Qwest I and Qwest II proceedings.⁴

As the chart below demonstrates, during the three months in which PO-20 has been in existence, Qwest accurately processed over 90% of Resale and UNE-P POTS LSRs and over 95% of Unbundled Loop LSRs that have fallen out for manual processing.

Commercial Performance Results Under PO-20		
MONTH	RESALE/UNE-P	UNBUNDLED LOOPS
June	90.25%	96.46%
July	90.58%	95.20%
August	92.78%	95.16%

Qwest's performance under PO-20 is measured on a region-wide basis. Qwest provided extensive information in connection with its manual order processing, and, more specifically, on PO-20, in the Qwest I and Qwest II proceedings.⁵

³ See *id.*

⁴ See *id.*; see also Qwest 08/20/02m Ex Parte (Response to FCC Confirming Submission of PID PO-20 to States for Inclusion in PAP).

⁵ See Qwest 09/10/02a Ex Parte (Response to Wireline Competition Bureau on Revisions to LSR Volumes under PO-20 for ROC I); Qwest 09/10/02b Ex Parte (Response to Wireline Competition Bureau on Revisions to LSR Volumes under PO-20 for ROC II); Qwest 09/03/02d Ex Parte (Response to Wireline Competition Bureau on LSR Volumes Under PO-20 for April-June For Resale, UNE-P, and UBL for ROC I); Qwest 09/03/02e Ex Parte (Response to Wireline Competition Bureau on LSR Volumes Under PO-20 for April-June For Resale, UNE-P, and UBL for ROC II); Qwest 08/27/02c Ex Parte (Response to Wireline Competition Bureau on Draft Description of Order Accuracy Performance Measure); Qwest 08/23/02c Ex Parte (Response to DOJ on PO-20); Qwest

In response to CLEC input on PO-20 (and pursuant to the standard practice being adopted for new PIDs and PID modifications), Qwest has requested that PO-20 be addressed in the Long-term PID Administration (“LTPA”) process. The first LTPA meeting has tentatively been scheduled for October 3, 2002. While PO-20 is under discussion, Qwest will continue to report its manual service order accuracy performance under PO-20’s current definition.

On August 19, 2002, Qwest requested that each of the nine Application states include PO-20 in its state Performance Assurance Plan (“PAP”). Each of these states is in various stages of developing a record with respect to Qwest’s request, and Qwest expects that these states will take into account the LTPA’s review of PO-20 in their processes. ⁶

08/20/02m Ex Parte (Response to FCC Confirming Submission of PID PO-20 to States for Inclusion in PAP); Qwest 08/19/02b Ex Parte (Response to Wireline Competition Bureau on PO-20 Performance Measure Fields, DSL Resale Discount and Performance Results for EEL); Qwest 08/09/02b Ex Parte (Response to FCC on Manual Service Order Accuracy).

⁶ See Exhibit 1-2 (PO-20 Filing Status Chart). As of the date of this filing, only Colorado and Washington have acted on Qwest’s submission. The Colorado PUC declined to incorporate PO-20 into the Colorado PAP at this time, and instead deferred consideration of its adoption until such time as the LTPA has processed PO-20. *In the Matter of Qwest’s Corporation’s Performance Assurance Plan*, Docket No. 02M-259T, *Order Denying Motion*, adopted September 18, 2002, at 4. The Washington UTC, however, agreed to incorporate PO-20 into the Washington PAP, though the PID will be subject to further review in the LTPA process. *In the Matter of the Investigation into U S WEST Communications, Inc.’s Compliance with Section 271 of the Telecommunications Act of 1996, et. al*, Docket No. UT-003022, *43rd Supplemental Order; Approving Qwest’s Request for Acceptance of Performance Measure PO-20, With Conditions*, September 26, 2002, at 4.

LSRs submitted by carriers and resulting service orders contain a variety of fields. PO-20 was designed to compare those fields to determine whether the fields on the LSRs and service orders match. Admittedly, PO-20 is not designed to compare all of the fields that exist. For example, PO-20 does not compare the Services & Equipment (“S&E”) section of the service order to the LSR. This is because PO-20 was designed to evaluate perceived idiosyncrasies in Qwest’s manual processes resulting from KPMG’s analysis in the ROC OSS Test. Because KPMG’s analysis did not identify mismatches in the S&E sections of CLEC LSRs and service orders, Qwest did not focus on including those fields in PO-20. Regardless, to the extent CLECs prefer that fields be added to PO-20, they will have an opportunity to raise their concerns – and have them vetted fully – in the LTPA process.

In its Qwest I and Qwest II filings, Qwest discussed the multiple measures it has put in place to ensure that manually-processed service orders are processed accurately. Qwest has continued to implement system enhancements to further this objective. For example, system edits were implemented on August 17, 2002, as part of the IMA 10.1 release. These edits included a comparison of the Purchase Order Number (“PON”) populated on the service order(s) listed on the FOC to

the PON on the LSRs that the Qwest service order representative processes to ensure mismatches do not occur.⁷

Qwest already filed in Qwest I and Qwest II a description of what its PO-20 performance would have been had these system edits been in place between April through July, 2002.⁸ As explained in that filing, Qwest's performance would have improved anywhere between 0.24% and 5.78% (depending on the product) in each month during that period.⁹ Had the August 17 enhancement been in place for all of August, Qwest's performance under PO-20 that month also would have improved. Specifically, Qwest's performance for Resale and UNE-P POTS would have increased from 92.78% to 93.33%, and its performance for Unbundled Loops would have increased from 95.16% to 96.08%. The August 17 edit also was intended to ensure consistency between the due date on the service order and on the FOC; this aspect of the edit was implemented on August 17, and, because of issues that arose during implementation, will be enhanced so that it applies to additional products and services no later than October 12, 2002.

In an ex parte filing in the Qwest I and Qwest II proceedings, Eschelon claimed that LSRs manually handled by Qwest are subject to

⁷ The August 17 edit applies only to initial LSRs because the PON must remain the same on any supplemental LSR.

⁸ See Qwest 08/23/02c Ex Parte (Response to DOJ on PO-20).

⁹ See *id.*

error rates as high as 40%.¹⁰ Eschelon based this figure on its purported comparison of Pending Service Order Notifications (“PSOs”) to LSRs. On August 17, 2002, Qwest began providing CLECs with PSOs – which follow FOCs – to give CLECs the option, if they so desire, to compare the service order the Qwest SDC has manually submitted on behalf of the CLEC to the LSR initially submitted by that CLEC. Qwest began providing CLECs with this capability in response to a Change Request submitted by Eschelon.¹¹ Eschelon claims to have conducted an analysis of PSOs to LSRs from August 26 through September 3, 2002, to arrive at its 40% figure.¹²

Eschelon’s 40% figure is wildly overstated and lacks any basis in fact. After learning of Eschelon’s claims, Qwest asked to review the relevant data collected by Eschelon and received *a mere seven* occurrences dating from August 26 through September 6, 2002. After conducting its own analysis of the LSRs provided, Qwest discovered that only six of the LSRs contained errors.¹³

¹⁰ See Eschelon Ex Parte in Qwest I and Qwest II, filed September 4, 2002, at 10-11.

¹¹ See Exhibit 1-3 (Eschelon Change Request #25497)

¹² See *id.*

¹³ Qwest’s data show that the company returned 1211 FOCs to Eschelon between August 26 and September 3, 2002. As noted above, only six of the occurrences Eschelon provided to Qwest contained errors. It is unclear to Qwest whether Eschelon considers this to be the full universe of LSRs that were manually processed incorrectly. If it is, the six occurrences Eschelon provided amount to a mere 0.495% (6/1211) of the LSRs it submitted during this period.

To validate its analysis, Qwest separately manually reviewed 2,118 ISC Call Center tickets that were received from Eschelon between August 19 and September 13, 2002. Qwest did this to investigate Eschelon's claim that, when it found a mismatch between the PSON and LSR, it contacted a Qwest Service Center. Qwest's analysis showed that, of the 2,118 tickets received from Eschelon, only 41 contained comments that could reasonably be interpreted as identifying a potential mismatch between the PSON and the LSR. During this same period, Eschelon received FOCs on 3,843 LSRs, as measured by PO-5A and PO-5B. Thus, even during this longer stretch of time, PSON to LSR mismatches occurred only on 1.06% of LSRs. It defies logic for Eschelon to suggest that 40% of its orders during the August 26 through September 3, 2002, time period contained such mismatches.

B. Service Order Accuracy

To demonstrate its commitment to refining its overall service order accuracy – and in response to CLEC concerns regarding the accuracy of Qwest installations – Qwest has begun to report additional service order accuracy results that reflect order accuracy based on the number of customer calls received each month by the Call Centers reporting discrepancies between the LSR submitted and the service provided by Qwest.¹⁴ This measure, which in the past was sometimes

¹⁴ See “Summary of Notes on Qwest Regional Performance Results Report, September 2001 – August 2002,” September 24, 2002, *available at* www.qwest.com/wholesale/downloads/2002/020925/RGSep01-

referred to as “OP-5++” but is now called “Service Order Accuracy – via Call Center Data,” is reported on a state-specific aggregate basis for all products listed in the OP-5 PID. The measure is intended to report those discrepancies that are not captured by the PID OP-5, which pertains to installation quality.¹⁵ Results are calculated using the same base of orders as OP-5.¹⁶

Qwest began reporting its performance under the “Service Order Accuracy – via Call Center Data” measure only recently (in July 2002), but its performance in each of the nine Application states has been very strong. For example, in Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah and Washington, more than 99% of the orders issued were error free in both July and August, 2002.¹⁷ In Wyoming, 96.80% of orders in July and 98.56% of orders in August were error free;¹⁸ but, because the volume of service orders in Wyoming is

Aug02NotesSummary.pdf, at Attachment 3. For ease of reference, a current copy of Qwest’s “Service Order Accuracy – via Call Center Data” measure is attached hereto as Exhibit 1-4. *See also* Qwest 08/27/02c Ex Parte (Response to Wireline Competition Bureau on Draft Description of Order Accuracy Performance Measure).

¹⁵ *See id.* at 1.

¹⁶ *See id.* at 43.

¹⁷ *See* Colorado Commercial Performance Results at 77; Idaho Commercial Performance Results at 74; Iowa Commercial Performance Results at 76; Montana Commercial Performance Results at 69; Nebraska Commercial Performance Results at 75; North Dakota Commercial Performance Results at 69; Utah Commercial Performance Results at 76; Washington Commercial Performance Results at 77.

¹⁸ *See* Wyoming Commercial Performance Results at 68.

significantly lower than in, for example, Colorado, conclusions regarding Qwest's capabilities are more appropriately drawn from its performance in the other Application states.

Qwest's "Service Order Accuracy – via Call Center Data" measure is in the early stages of development, but Qwest expects it to evolve into an official PID in the near future. To that end, Qwest plans to submit this measure to the LTPA process, which is scheduled to commence in early October, after which it will be subject to comment and further refinement by CLECs, state regulatory agencies, and other participating parties.

**Status of “Conversion as Specified”
and “Migration by TN” Change Requests**

In mid-June, 2002, Z-Tel submitted a Change Request (“CR”) asking Qwest to modify its “Conversion as Specified” process for migrating end users.¹ WorldCom also submitted a CR at that time requesting that Qwest modify its OSS to permit conversions using only a telephone number (“Migration by TN”) for UNE-P.² Pursuant to agreed-upon Qwest Change Management procedures, these two CRs, together with all of the other CRs submitted during a specified timeframe, were prioritized for IMA release version 12.0, scheduled for deployment in April 2003.³

The change to the “Conversion as Specified” process was collectively prioritized by the parties as number two, and “Conversion by TN” was prioritized as number 19.⁴ The process to which these CRs are

¹ Z-Tel’s request for a modification of the “Conversion as Specified” process was designated as CR SCR060702-01.

² WorldCom’s request for “Migration by TN” was designated as CR SCR061302-01.

³ WorldCom’s CRs were submitted the week IMA 10.0 was implemented, and after the prioritization of CRs for IMA 11.0, scheduled for deployment in November 2002, had occurred. Thus, pursuant to the Change Management Process, the next possible major IMA release in which WorldCom’s CR’s could be implemented was IMA 12.0.

⁴ See Exhibit 2-1 (Qwest Wholesale Change Management Process Meeting Minutes, September 19, 2002) at 1.

subject following prioritization was described in an ex parte filing in the Qwest I and Qwest II proceedings on September 5, 2002.⁵

On August 23, 2002, over two months after its submission of the original CRs, WorldCom submitted an Exception Request, asking Qwest to implement the change to the “Conversion as Specified” process and the “Migration by TN” feature before the end of 2002.⁶ Current options for expediting CRs are the Late Adder Process, the Special Change Request Process, and the Exception Process. WorldCom chose to invoke the Exception process. Exception Requests such as the one submitted by WorldCom permit a party to request that a particular CR bypass the documented Change Management Process (“CMP”), and instead be implemented outside of that process. To preserve the integrity of the CMP and ensure that no CLEC is disadvantaged by a departure from the standard process, the agreed-upon CMP guidelines require that Exception Requests of this nature be approved unanimously by CLECs to be implemented.⁷

On September 19, 2002, at the Monthly Systems CMP Meeting, CLECs convened to, among other things, vote on whether to

⁵ See Qwest 09/05/02a Ex Parte (Response to WCB on Prioritization of TN Migration and Migration as Specified According to CMP).

⁶ See Exhibit 2-2 (WorldCom Exception Request SCR082302-01EX, August 23, 2002).

⁷ See, e.g., Qwest II Declaration of Dana L. Filip, Change Management, at ¶¶ 96-97.

authorize WorldCom's Exception Request.⁸ Following a brief question and answer session in which Qwest described the procedures it would deviate from – and the resources it would have to devote – to implement the change to the “Conversion as Specified” process and add the “Migration by TN” feature in advance of IMA 12.0, the CLECs voted on the Exception Request. It is worth noting that during the question and answer period, Qwest explained that other options to expedite the implementation of migration by “Conversion as Specified” and “Migration by TN” existed. For instance, Qwest noted that work could be done to covert the IMA 11.1 point release in January or February 2003 into a new special major release.⁹ WorldCom rejected this option.¹⁰

Ultimately, six CLECs voted in favor of WorldCom's Exception Request, five CLECs opposed it, and three CLECs abstained from voting. Qwest voted to oppose the Exception Request. Notably, AT&T and Eschelon, both of whom provide local service through UNE-P, opposed WorldCom's Exception Request. Because these CRs were not approved unanimously, they were not adopted. CLECs were notified of this outcome on September 24, 2002.¹¹ Qwest will continue to target

⁸ The other aspects of the meeting are not reflected in the attached meeting minutes.

⁹ See Exhibit 2-1, (Qwest Wholesale Change Management Process Meeting Minutes, September 19, 2002) at 1.

¹⁰ See *id.* at 2.

¹¹ See Exhibit 2-3 (Qwest Notification Regarding SCR082302-01EX, September 24, 2002).

these two CRs for inclusion in IMA 12.0, which, as noted above, is scheduled for release in April 2003.

Reporting Service Affecting Troubles

In an ex parte filing in the Qwest I and Qwest II proceedings, Eschelon claimed that, because Qwest directs CLECs to report troubles on new products or services within 72 business hours of installation, reports of such troubles are inappropriately excluded from Qwest's OP-5 (New Service Installation Quality) performance measure.¹

Qwest directs CLECs to contact the Interconnect Service Center ("ISC") if a problem arises with a new product or service within 72 business hours of installation. Research must often be conducted to determine the correct disposition of the CLEC inquiry, because certain calls in connection with new products and services should not necessarily result in trouble tickets. Calling the ISC is the most efficient way for a CLEC to ensure that Qwest will address – and, if needed, correct – a problem identified with a new product or service.

Calls to the ISC within 72 business hours of service installation generally fall into four categories: (1) customer education; (2) trouble reported prior to the technician completing installation work; (3) trouble reported after the technician has completed the installation work resulting from an LSR/Service Order mismatch; or (4) trouble reported after the technician has completed the installation work resulting from improper provisioning or an installation failure. Only troubles that fall into the fourth category are appropriately included in OP-5.

Specifically, sometimes the perceived trouble is not an actual trouble and the CLEC customer simply needs to be educated about the product, service or feature (Category 1). A trouble ticket would not be issued if this occurred. Calls in this category would not be included in OP-5. If the trouble reported is found to have occurred prior to the technician completing the installation work (Category 2), Qwest notifies the CLEC of that and provides the CLEC with advice on the service order, such as noting that the service order is pending. A trouble ticket would not issue because the installation work had not yet been completed.

If the trouble reported is found to have occurred after the technician has completed the installation work, but further investigation shows that the service order was incorrectly written by Qwest (Category 3), then this activity would be captured in Qwest's new "Service Order Accuracy – via Call Center Data" measure (identified previously by some as "OP-5++"), described above. Again, no trouble ticket would be issued on that service order because the problem was associated with the LSR/Service Order mismatch, not the installation work itself.

Only if the trouble reported is found to have occurred after the technician has completed the installation work and further investigation uncovers that, though the service was ordered accurately it was not provisioned properly or failed after installation (Category 4), would a trouble ticket be issued. In either scenario, the ISC either would

¹ See Qwest I and Qwest II, Eschelon Ex Parte, filed September 4,

provide a warm transfer connecting the CLEC to the repair handling center (“RHC” or “AMSC”) or direct the CLEC to contact the appropriate repair handling center. The repair handling center, in turn, would initiate the trouble report or trouble ticket.

Because only those calls to the ISC of a Category 4 nature are appropriately counted in OP-5 (assuming the disposition of the trouble report is not exempt, as defined by the PID, to begin with), Eschelon’s claim that Qwest’s 72 hour process improperly excludes certain troubles from its OP-5 reporting is false.

2002, at 1-9.

Status of Timely Jeopardy Notice Performance (PO-9)

PID PO-9 measures the percentage of late orders for which Qwest provides timely jeopardy notices.¹ Timely jeopardy notices are measured for four product categories: Non-Designed Services (PO-9A); Unbundled Loops (with or without LNP) (PO-9B); LIS Trunks (PO-9C); and UNE-P POTS (PO-9D).² The performance standard for PO-9 is parity with Retail.

In 2002, Qwest's overall commercial performance under PO-9 in the Application states was very strong. Of the 288 PO-9 submeasures in the nine Application states, Qwest met the parity standard for 261 in January through August, or over 90% of the time.³ On the few occasions in which Qwest did not meet the parity standard, Qwest has explained the reason for these misses.⁴ Notably, *Qwest did not miss a single PO-9 submeasure in the most recent month for which data is available, August 2002.*

¹ See 14-State PID 5.0 at 21 (PO-9).

² See *id.*

³ See Colorado Commercial Performance Results at 67-70 (PO-9); Idaho Commercial Performance Results at 64-67 (PO-9); Iowa Commercial Performance Results at 66-69 (PO-9); Montana Commercial Performance Results at 59-62 (PO-9); Nebraska Commercial Performance Results at 65-68 (PO-9); North Dakota Commercial Performance Results at 60-62 (PO-9); Utah Commercial Performance Results at 66-69 (PO-9); Washington Commercial Performance Results at 67-70 (PO-9); Wyoming Commercial Performance Results at 58-61 (PO-9).

⁴ See Qwest I OSS Decl. at ¶¶ 260-300; Qwest I OSS Reply Decl. at ¶¶ 127-136; Qwest II OSS Decl. at ¶¶ 248-281; Qwest II OSS Reply Decl. at ¶¶ 22-24.

Virtually the only product for which Qwest did not meet the parity standard between January and August, 2002, was Unbundled Loops (PO-9B). As Qwest noted in its earlier filings, the company's performance for this product is explained in part by the limitation inherent in the PO-9 measure.⁵ Specifically, due to Qwest's Build/Hold Process, the volume of jeopardy notices for unbundled loops eligible for inclusion under PO-9 for Wholesale is more limited than the other products measured under PO-9.⁶ As a result, PO-9 is probable candidate for revision through the Long-term PID Administration ("LTPA") process. The first LTPA meeting has been tentatively scheduled for October 3, 2002. Once the parties meet and agree on preliminary procedural guidelines, Qwest will follow the appropriate process for proposing and negotiating modifications to PO-9.

⁵ See Qwest I OSS Reply Decl. at ¶ 17; Qwest II OSS Decl. at ¶ 260.

⁶ The numerator of PO-9 is limited to jeopardy notices issued before the due date. Most of the time if a jeopardy notice is issued before the due date it involves a lack of facilities. Second, to be counted, the order must have been assigned a due date and been completed/closed in the reporting period. Based on the definitional requirements, most jeopardy notices included in PO-9 are issued because there are no available facilities. For unbundled loops, though, Qwest's Build/Hold Process decreases the opportunity to include jeopardy notices in PO-9. The process, which was negotiated extensively with CLECs, follows detailed facility assignment process upon receipt of a UNE order. During this process, if facilities are not found, the order is held for 30 business days to await facility availability. Although Qwest issues jeopardy notices in these situations to inform CLECs of the status of their orders, these jeopardy notices are not included in the calculation of PO-9 unless facilities are found and the order is completed. As a result, the volume of jeopardy notices for unbundled loops included in PO-9 for wholesale is reduced. See Qwest II Performance Measures Decl. at ¶ 132.

Qwest's earlier filings are replete with explanations as to why Qwest sometimes does not meet the parity standard for Unbundled Loops – and why these misses do not suggest that CLECs are not provided with a meaningful opportunity to compete in the marketplace for local service.⁷ Qwest's earlier filings also explain that, on June 17, 2002, Qwest installed an enhanced IMA notification process which utilizes system-to-system capability to provide CLECs with automated jeopardy notices for Non-Designed Services, Unbundled Loops, and UNE-P POTS.⁸ This enhanced IMA notification process was intended to – and clearly did – improve Qwest's ability to provide CLECs with timely jeopardy notifications, together with overall improvements in Qwest's operational processes. Qwest missed only three PO-9 submeasures (out of a total of 36) in July – a marked improvement over prior months – and did not miss *any* PO-9 submeasures in August.⁹

The June 17 enhancement to the IMA notification process – in addition to the company's overall operational progress – clearly improved Qwest's performance results under PO-9. However, the small sample sizes generated under the PID continue to pose a risk that a

⁷ See Qwest I OSS Decl. at ¶¶ 268-270, 278-280, 287, 298; Qwest I OSS Reply Decl. at ¶¶ 17-24; Qwest II OSS Decl. at ¶¶ 252-253, 260-263; Qwest II OSS Reply Decl. at ¶¶ 22-24.

⁸ See Qwest I OSS Decl. at ¶ 270; Qwest I OSS Reply Decl. at ¶¶ 19, 131; Qwest II OSS Decl. at ¶ 262; Qwest II OSS Reply Decl. at ¶¶ 24, 187.

⁹ See *supra*, note 3.

single order – or small group of orders – can skew Qwest’s performance results under PO-9. Qwest therefore continues to believe that a re-evaluation of PO-9 through the Long-term PID Administration process may be needed to ensure that Qwest’s performance in issuing timely jeopardy notices is measured fairly and appropriately in the future. Nevertheless, Qwest’s strong performance in July and its perfect results in August provide a clear indication that the company is capable of issuing – and indeed has issued – timely jeopardy notices for all products on a consistent basis.

**Bill Auditability, BOS Status, Dispute Resolution
Timeliness, and Accuracy/Completeness**

The FCC has held that a BOC must provide CLECs with nondiscriminatory access to billing functions to satisfy Section 271. More specifically, a BOC must, among other things, provide CLECs with complete, accurate, and timely Wholesale bills.¹ It is well-settled that BOCs do not have to provide a particular form of access to OSS. Industry bodies have not established specific standards for access to billing functions for local competition. Even if such standards had been established, they would not be requirements for Section 271 purposes. Indeed, the FCC has explicitly held that “compliance with industry standards is not a requirement of providing nondiscriminatory access to OSS functions,”² and that adherence to OSS industry standards “is not a prerequisite.”³ Thus, a BOC can satisfy the requirement of providing CLECs with nondiscriminatory access to Wholesale bills in more than one way.

In the past, a BOC’s ability to meet the FCC’s requirements in connection with Wholesale billing – including bill auditability – has been assessed using the UNE-P bill. This is because UNE-P is among the most complex services ordered by CLECs. It is axiomatic that a BOC’s ability to bill UNE-P on a complete, accurate and timely basis is representative of its billing

¹ See *Delaware/New Hampshire 271 Order* at App. F, ¶ 39; *New Jersey 271 Order* at ¶ 121; *Pennsylvania 271 Order* at ¶ 13.

² See *Louisiana 271 Order* at ¶ 137.

³ See *New York 271 Order* at ¶ 88.

capabilities as a whole. Therefore, Qwest focuses here primarily on UNE-P bills.

Qwest offers electronic bills to CLECs in three formats (in addition to paper bills): ASCII, EDI, and BOS.⁴ Qwest provides these electronic formats to CLECs through a variety of media and transmission methods.⁵ As illustrated in the chart below, the overwhelming majority of CLECs in the nine Application states have chosen to receive ASCII electronic bills, along with paper copies.⁶ (The majority of the remaining 25% utilize only paper bills.)

STATE	UNE-P CLECs Receiving ASCII
CO	9/12
ID	1/3
IA	4/4
NE	4/5
ND	4/5
MT	4/8
UT	3/4
WA	14/17
WY	2/2
TOTAL	45/60 (75%)

⁴ See Qwest I OSS Decl. at ¶ 498; Qwest I OSS Reply Decl. at ¶ 178; Qwest II OSS Decl. at ¶ 481; Qwest II OSS Reply Decl. at ¶ 274.

⁵ See Qwest I OSS Decl. at ¶ 498; Qwest I OSS Reply Decl. at ¶¶ 180, 182, 188; Qwest II OSS Decl. at ¶ 481; Qwest II OSS Reply Decl. at ¶¶ 277, 279, 285.

⁶ See Qwest I OSS Decl. at ¶ 501; Qwest I Reply OSS Decl. at ¶¶ 181 & n.223, 183, 186; Qwest II OSS Decl. at ¶ 484; Qwest II OSS Reply Decl. at ¶¶ 278 & n.397, 280, 284.

A. ASCII and EDI Bill Auditability

The record is already replete with evidence that both Qwest's ASCII and EDI bills are fully auditable, thereby satisfying the FCC standard.⁷ Nevertheless, additional information regarding the auditability of Qwest's ASCII and EDI bills is provided here.

Qwest divides its billing OSS into three billing regions: Western, which contains Washington; Central, which contains Colorado, Idaho, Montana, Utah, and Wyoming; and Eastern, which contains Iowa, Nebraska, and North Dakota.⁸ Bills are produced by state within each of the three billing regions.

All bills, regardless of which billing region produces them, contain equivalent audit-affecting billing information and a comparable level of detail.⁹ In the ROC I and ROC II proceedings, AT&T claimed that bills produced in Qwest's Central region do not contain the same categories for summary of charges as bills produced in Qwest's Western region, and that this effectively prevents it from performing basic validation steps.¹⁰ According to AT&T, the lack of categorized summary charges in the Central region requires AT&T to

⁷ See Qwest I OSS Reply Decl. at ¶¶ 190-202, 206-214; Qwest II OSS Reply Decl. at ¶¶ 287-299, 303-311.

⁸ Only the Application states are identified in the above description. It is worth noting that bills in Oregon are processed out of the Western region; bills in Arizona and New Mexico are processed out of the Central region; and bills in Minnesota and South Dakota are processed out of the Eastern region.

⁹ Qwest has in place a mechanism by which it ensures that its ASCII and EDI bills contain the same information as the paper bill. This process will be fully automated by November 15, 2002.

estimate those charges in the specific accounts and sub-accounts in its general ledgers and make periodic revisions to those charges on a going-forward basis.

¹¹ AT&T noted that while such a procedure is consistent with GAAP, it is inconsistent with AT&T's own procedures that actual charges be the basis of accounting entries. ¹²

None of AT&T's contentions preclude a finding that Qwest's regional billing systems meet the FCC's requirements. To begin with, AT&T admits that the so-called "problem" with bills produced in the Central region does not preclude it from entering charges in its accounts consistent with GAAP. Second, AT&T's claim applies only to paper bills, which AT&T already has admitted it does not use to audit bills. ¹³ Qwest provides CLECs with electronically formatted bills precisely because it makes it easier for them to audit their bills. AT&T not only receives such electronic bills, but, in response to an express request by AT&T, Qwest recently initiated a new billing format, BOS. Third, AT&T's claims relate to the summary portion of the bill, not the detailed usage portion that is used for auditing. The differences in Central region paper bills that AT&T identified, therefore, are immaterial to AT&T and other CLECs.

AT&T also claimed that Qwest's CRIS-generated bills do not contain information that other BOCs include on their bills, such as a

¹⁰ See AT&T Ex Parte, Qwest I and Qwest II, filed August 29, 2002, at 1-2.

¹¹ See *id.*

¹² See *id.*

breakdown of usage by jurisdiction, which is necessary to determine tax liability, or a breakdown of nonrecurring and other charges, which allow for reconciliation of specific charges such as UNE-P service order charges.¹⁴ But AT&T failed to mention that its interconnection agreements with Qwest *require* Qwest to lump local and intraLATA usage under the local jurisdiction.¹⁵ In fact, AT&T's current contract negotiation proposal contains this same requirement.

Regardless, Qwest does in fact provide AT&T with the means to separate local from intraLATA usage by doing so in its paper and electronic-formatted bills. As for AT&T's claim that Qwest's bills do not provide a breakdown of nonrecurring and other charges, the examples AT&T provides ("Charges for Unbundled Service (X15)" and "Adjustment for Unbundled Services (X18)") are exclusive to BOS and do not appear on ASCII or EDI bills. Qwest is aware of this issue in connection with BOS and has included it on its BOS "Differences List," which identifies disparities on a rolling basis so that CLECs are aware of them. As discussed more fully below, Qwest is continuing to work on its BOS offering and will continue to implement improvements.

¹³ See AT&T Comments, Qwest II, at 47.

¹⁴ See AT&T Ex Parte, Qwest I and Qwest II, filed August 29, 2002, at 2.

¹⁵ See Exhibit 5-1 (Excerpts of Interconnection Agreements between AT&T and Qwest in Colorado, Iowa, and Washington). AT&T's Interconnection Agreements in the remaining nine Application states, with the exception of Wyoming, contain the same language. In Wyoming, AT&T opted into Covad's Interconnection Agreement with Qwest.

ASCII and EDI bills, regardless of which billing region produces them, can be audited using readily available commercial software. The record describes in detail how readily available commercial products and vendors can be used to audit Qwest's bills.¹⁶ Notably, the services and support available for auditing ASCII and EDI bills are not exclusive to small or low volume CLECs.

The highest-volume CLEC operating within Qwest's 14-state region receives ASCII-formatted bills. Qwest bills this CLEC for over 350,000 lines per month in the nine Application states. And as discussed above, the vast majority of CLECs doing business with Qwest choose to receive ASCII bills. The brief discussion below supplements Qwest's previous explanations of how ASCII- and EDI-formatted bills are auditable.

1. Microsoft Access

Microsoft Access is a sophisticated database management program that allows CLECs to load and analyze the bills they receive in ASCII format from Qwest. Microsoft Access 2002 has no line limitation. It does have a file size limitation of "2 gigabytes minus the space needed for system objects."¹⁷ But Microsoft's website also indicates, "if you use a Counter as the primary

¹⁶ Qwest I OSS Reply Decl. at ¶¶ 209-214; Qwest II OSS Reply Decl. at ¶¶ 307-311.

¹⁷ See ACC2002: Access Database and Project Specifications and Limits, <http://support.microsoft.com/default.aspx?scid=kb;en-us;Q302524>.

key, a table can contain up to four billion records.”¹⁸ To the extent CLECs find Microsoft Excel confining – which, as explained more fully below, they should not – they always can avail themselves of Microsoft Access.

2. Microsoft Excel

Microsoft Excel is a widely available database management program that, like Microsoft Access, enables CLECs to load and analyze the bills they receive in ASCII format from Qwest. Although it has been reported that Excel is subject to line limitations – *i.e.*, it may not function properly if more than 65,536 rows and 256 columns¹⁹ of data are entered – this row limitation should in no way preclude CLECs from using the software. If a CLEC happens to require more than 65,536 Microsoft Excel rows and 256 columns to analyze a given file, the billing data for that file can be sub-divided into more than one Excel spreadsheet. Because Qwest bills CLECs by product – and separately for each state – it is unlikely that such subdivision will be required. Each product, in turn, can be split into multiple accounts per state to prevent over-sized bills. Notably, not a single CLEC that uses Excel to audit its bills has indicated to Qwest that it has been affected by this line limitation.

To the extent the number of accounts held by CLECs using Excel increase over time, those CLECs can request that the bills for the affected

¹⁸ See *id.*

¹⁹ See XL2002: Maximum Number of Rows and Columns, <http://support.microsoft.com/default.aspx?scid=kb;en-us;Q321148>.

product group(s) be sub-divided or avail themselves of Microsoft Access. Furthermore, in an attempt to reduce the effect that this potential line limitation has on a CLEC's ability to use Microsoft Excel, Qwest recommends a cap on the total number of sub-accounts that are established under any one Wholesale summary account. Most CLECs appear to follow Qwest's recommendation, and they are encouraged to establish no more than 2,000 sub-accounts within any one summary account. Limiting the number of sub-accounts helps ensure the row limitations in Microsoft Excel are not reached.

3. Billing Disputes Received

As noted above, a number of CLECs with high order volumes and a large number of end-users receive ASCII or EDI bills for UNE-P. These CLECs are auditing their bills and availing themselves of Qwest's bill dispute resolution process as needed. Information regarding disputed amounts by CLECs has already been included in the record. ²⁰

4. Bill Auditing Vendors

CLECs have the option of outsourcing their bill auditing needs to the many vendors that provide such services. ²¹ These companies include broad:margin, CHR Solutions, HTL Telemanagement Ltd., and TEOCO. ²² Indeed, Qwest already demonstrated that it has received disputes from broad:margin on behalf of Global Crossing. ²³

²⁰ See Qwest I OSS Reply Decl. at ¶206; Qwest II OSS Reply Decl. at ¶ 303.

²¹ See Qwest I OSS Reply Decl. at ¶ 212; Qwest II OSS Reply Decl. at ¶ 309.

²² See *id.*

²³ See *id.*

AT&T attempted to discredit the availability of vendors to perform bill-auditing functions, but AT&T does not provide one shred of evidence of – and can only speculate about – any particular vendor’s inability to provide such services to CLECs. First, AT&T complained that it only became aware of these vendors when Qwest identified them in its filing.²⁴ AT&T then claimed to have conducted its own “investigation” of these vendors and complains that, regardless of the vendor, the CLEC would be required to convert its CRIS-generated bill to a vendor’s systems so that it could be audited. That AT&T was not aware of these vendors and then embarked on a crusade to discredit them suggests that AT&T is more interested in undermining Qwest than competing in the local market. Regardless, the fact that a CRIS-generated bill would have to be converted to a vendor’s system to be audited is proof that Qwest’s bills can be appropriately manipulated for purposes of auditing.

AT&T claimed that broad:margin’s bill auditing services are used “mostly” for access charges, rather than Wholesale charges.²⁵ AT&T also claimed that although broad:margin expressed a willingness to develop verification, audit or bill analysis processes to meet AT&T’s needs, it does not offer to carriers such as AT&T a “packaged” solution.²⁶ AT&T further claimed that “it is likely” that AT&T would be required “to pay a substantial price” for

²⁴ See AT&T Ex Parte, Qwest I and Qwest II, filed August 29, 2002, at 3.

²⁵ See *id.* at 4.

²⁶ See *id.*

such a solution. ²⁷ But AT&T does not – and, indeed, cannot – state that broad:margin cannot audit Wholesale local bills. That broad:margin did not offer AT&T a pre-packaged, turn-key solution is a testament to its flexibility and a recognition that CLECs will want – and that companies like broad:margin can accommodate – different services and formats. Moreover, AT&T’s vague assertions regarding price demonstrate how limited its familiarity with vendors such as broad:margin really is.

AT&T claimed that broad:margin does not publicly advertise bill validation as one of its services, presumably implying that broad:margin does not actually perform bill validation. ²⁸ AT&T also claimed that broad:margin’s statement, filed in the ROC I and ROC II proceedings, that it audits Global Crossing’s Wholesale bills contradicts broad:margin’s representations to AT&T. ²⁹ But AT&T provides absolutely no support for these assertions. There is neither a letter nor e-mail from broad:margin, nor a transcript of a telephone conversation, nor an affidavit of any conversation between AT&T and broad:margin to this effect. On September 16, 2002, broad:margin made a presentation to CLECs about the Wholesale bill auditing services it provides. Furthermore, contrary to AT&T’s “investigation,” broad:margin does publicly advertise its bill auditing capabilities on its website (only one click past the home page): “Our diverse suite of tools includes BillTamer™, a powerful cost

²⁷ See *id.*

²⁸ See *id.*

²⁹ See *id.*

management system that automatically processes, validates, and manages telecommunications bills. . . .”³⁰ Broad:margin further details what services are available through its BillTamer™ product.³¹

AT&T claimed that billing vendor TEOCO’s services also are limited and that TEOCO would not be able “to determine the accuracy of the bills and the consistency of charge elements with [AT&T’s] interconnection agreements, with products and services that have been ordered from the RBOC, and with the prior month’s billings.”³² TEOCO indicates on its website that it can provide precisely the services AT&T describes. Its BillTrak Pro™ offering allows companies to verify charges against internal data, comparing the details of billing between what the CLEC expects from its internal data and what appeared on the CLEC bill.³³ AT&T’s “pot shots” at TEOCO have no basis in fact and should be disregarded.

AT&T claimed that billing vendor CHR cannot audit AT&T’s bills because of Qwest’s alleged “failure” to break-down usage by jurisdiction and nonrecurring charges with other charges.³⁴ But as discussed above, Qwest includes in its electronic bills a breakdown of charges for auditing purposes. Also, Qwest’s fully auditable ASCII bill contains the level of detail necessary for AT&T to audit nonrecurring and other charges.

³⁰ See The Tools, www.broadmargin.com/tool.html.

³¹ See BillTamer™, www.broadmargin.com/billtamer.html.

³² See AT&T Ex Parte, Qwest I and Qwest II, filed August 29, 2002.

³³ See BillTrak Pro™, www.teoco.com/tts/btp.htm.

³⁴ See AT&T Ex Parte, Qwest I and Qwest II, filed August 29, 2002.

AT&T's specious "investigation" does nothing to detract from the fundamental truth that CLECs can and do successfully use the companies identified by Qwest for their bill validation needs. AT&T's claims are generally unsupported, often factually inaccurate, and thus should not be heeded.

5. EDI Auditability

One CLEC currently receives its Wholesale UNE-P bills from Qwest in EDI format.³⁵ Qwest's EDI bills are generated in full compliance with industry EDI billing standards and provide an auditable level of detail. Monthly and non-recurring charges are provided with USOC itemization as with ASCII bills, and usage charges are provided at the same levels of itemization as with ASCII bills.

Because EDI is an industry standard, numerous EDI software solutions – ranging from complete packages to outsourcing – are commercially available to audit such bills. The fact that EDI processing is already used for many transactions with vendors suggests that it works well in the commercial arena. Several major IXC's have been receiving EDI bills from Qwest for Retail local service purchases for years. In fact, WorldCom is currently exploring the possibility of receiving bills in EDI format.³⁶

³⁵ Included in the record are the number of CLECs using EDI to receive UNE-P bills at the time Qwest filed its Qwest I and Qwest II Applications. See Qwest I OSS Reply Decl. at ¶ 183; Qwest II OSS Reply Decl. at ¶ 282.

³⁶ See OBF – Issue #1655 – Creating and Maintaining Additional Industry Standard Formats for Bill Rendering of Access Service and Other Connectivity, at Part B at 26, *available at* www.atlas.org/pub/clc/obf/bc/1655.doc

B. Update on the Status of BOS Implementation

On April 19, 2002, Qwest notified CLECs that it would make available Wholesale UNE-P bills in BOS format with a target production date as of July 1, 2002. Currently, one CLEC – AT&T – has requested and received its UNE-P bills in a BOS format; three UNE-P bills were rendered in July, August, and September 2002. Two other CLECs have expressed interest in learning more about the BOS format for their UNE bills, and Qwest is currently working with these CLECs to determine what may be required for them to transition to the BOS format in the future.

Qwest works with CLECs interested in receiving Wholesale bills. CLECs can explore receiving Wholesale bills in a BOS format by requesting that Qwest send them a test tape. The Qwest Process Specialist handling media processes then coordinates with the CLEC's IT department to make sure the test file is transmitted successfully. Qwest then requests feedback from the CLEC and collaboratively works with the CLEC to resolve any questions or issues.

To create the BOS format bill, Qwest converts the CRIS billing data into a BOS format and transmits it to the CLEC. The CLEC then reviews the Differences List provided by Qwest to guide its development efforts.³⁷ Qwest offers BOS-formatted bills for UNE-P via NDM, Web access, diskette, or BDT.³⁸

³⁷ See, e.g., Qwest II OSS Reply Exhibit CLD-50 (BOS Version 37 Differences List).

³⁸ See Qwest I OSS Decl. at 498; Qwest I OSS Reply Decl. at ¶188; Qwest II OSS Decl. at ¶ 481; Qwest II OSS Reply Decl. at 285.

In addition to its current offering of the BOS format bill, Qwest is in the process of working a CMP CR requesting that Unbundled Loops be billed in BOS format. Qwest plans to add Unbundled Loop Analog and Digital products to the BOS framework in subsequent phases: Phase One is planned for October 26, 2002, for analog two-wire loops; Phase Two is planned for December 31, 2002, for digital loops. ³⁹

On September 4, 2002, Qwest, in an ex parte submission, described for the FCC the issues it found – and in many cases resolved – in its July and August BOS bills. ⁴⁰ Qwest is continuing to refine its BOS outputs to minimize and resolve problems as they arise in the future.

Since September 4, 2002, Qwest added one relevant item to its Differences List. For UNE accounts that are processed through the Central and Eastern billing regions, the CSR data may not be processed on the same day as the bill data. As a result, the amount reflected in the Monthly Recurring Charge Total on the bill may not match the Monthly Recurring Charge Local Total on the CSR. This difference, however, is exclusive to BOS and does not occur with ASCII or EDI.

³⁹ Due to the phased implementation, for those CLECs who have analog and digital loops on the same summary bill, the CLEC may choose to wait until December 31, 2002, to receive a BOS-format bill for both, or may choose to divide the loop types onto two separate summary bills.

⁴⁰ See Qwest 09/04/02b Ex Parte (BOS Update).

C. Dispute Resolution Timeliness (Proposed PID BI-5)

Qwest has in place a process by which it acknowledges and resolves billing disputes. When Qwest receives a dispute, it verifies the content of the dispute and sends an acknowledgment of receipt to the CLEC within two business days.⁴¹ If Qwest receives a dispute with incomplete information, Qwest notifies the CLEC and works with it to get additional information to allow the SDC to understand the nature of the dispute so that Qwest may begin its investigation of the claim. Qwest's goal is to resolve all disputes within 28 calendar days of acknowledgment. Qwest has developed a proposed PID (BI-5) to evaluate its dispute acknowledgement and resolution performance.⁴²

Qwest has adopted a 95% benchmark for BI-5 for both acknowledging and resolving disputes.⁴³ Indeed, Qwest makes every effort to complete an investigation of a billing dispute as quickly and efficiently as possible. Occasionally, if a dispute involves multiple departments or other complicated factors, Qwest will negotiate an extended time frame in which to resolve the dispute while communicating the status of the dispute to the CLEC on a regular basis. An updated status may be provided to the CLEC by phone or via email.

⁴¹ See *id.*

⁴² See Qwest I OSS Decl. at ¶¶ 496-497; Qwest I OSS Reply Decl. at ¶ 221; Qwest II OSS Decl. at ¶¶ 479-480; Qwest II OSS Reply Decl. at ¶ 319.

⁴³ See *id.*

Although Qwest currently is tracking and reporting its performance under BI-5, Qwest acknowledges that it will be submitting proposed PID BI-5 to the LTPA for further discussion and input by CLECs. The first meeting of the LTPA is tentatively scheduled for October 3, 2002. While the details of BI-5 are under discussion, Qwest will continue to report its results. ⁴⁴

The current description of BI-5A is attached. ⁴⁵ For August 2002, Qwest met the benchmark for BI-5A (Acknowledgement) and BI-5B (Resolution) in each of the nine Application states.

D. Billing Accuracy and Completeness (BI-3A and BI-4A)

Qwest's commercial performance results consistently have been strong. In most cases, as the record indicates, Qwest has met or exceeded the parity or benchmark standard. ⁴⁶ Where Qwest did not meet the standard, Qwest explained what caused the miss and what Qwest was doing to prevent the same problem from recurring. ⁴⁷

Ongoing comprehensive rate validation efforts and cost docket implementation have sometimes caused Qwest to miss the parity standard in

⁴⁴ See Qwest II Reply Exhibit CLD-58 (Qwest Ex Parte, Qwest I, filed on August 2, 2002, on Draft PID BI-5). Qwest discussed its preliminary results for June and July 2002 in this Ex Parte as well.

⁴⁵ See Exhibit 5-2 (PID BI-5A); See also "Summary of Notes on the Qwest Regional Performance Results Report," available at www.qwest.com/wholesale/downloads/2002/020925/RG-Sep01-Aug02NotesSummary.pdf.

⁴⁶ See Qwest I OSS Decl. at ¶¶ 527-576; Qwest I OSS Reply Decl. at ¶¶ 25-38, 205; Qwest II OSS Decl. at ¶¶ 510-559; Qwest II OSS Reply Decl. at ¶¶ 25-31, 302.

⁴⁷ See *id.*

connection with PIDs BI-3A (Billing Accuracy) and BI-4A (Bill Completeness). In August 2002, Qwest missed the parity standard for BI-3A in Colorado, Idaho, Iowa, Montana, Nebraska, Utah, and Washington.⁴⁸ But, with the exception of Iowa and Nebraska, Qwest achieved a Wholesale result of over 98% in these states,⁴⁹ a level of performance that the FCC recently accepted when granting Bell South's recent five-state application.⁵⁰

For BI-4A, Qwest missed the parity standard in August 2002 in Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, and Wyoming.⁵¹ But, again, Qwest's performance in these states on a percentage basis was strong. Qwest achieved a Wholesale result of over 96% in North Dakota, over 97% in Colorado, Iowa, Nebraska, Utah, and Wyoming, over 98% in Montana, and over 99% in Idaho.⁵²

⁴⁸ See Commercial Performance Results at 81 (CO); 78 (ID); 80 (IA); 73 (MT); 79 (NE); 80 (UT); 81 (WA).

⁴⁹ See *id.* at 81 (CO); 78 (ID); 73 (MT); 80 (UT); 81 (WA). In Iowa, Qwest achieved a Wholesale Result of 93.91%, and in Nebraska, Qwest achieved a result of 86.63%. See *id.* at 80 (IA) and 79 (NE).

⁵⁰ See *Alabama, Kentucky, Mississippi, North Carolina, South Carolina 271 Order* at ¶ 174.

⁵¹ See Commercial Performance Results at 82 (CO); 79 (ID); 81 (IA); 74 (MT); 80 (NE); 74 (ND); 81 (UT); 73 (WY).

⁵² See *id.*

Status of DSL Disconnects on UNE-P Orders

As described in the Reply Declaration of Lori A. Simpson filed in WC Docket No. 02-189, Qwest modified its internal procedures to eliminate DSL disconnects in error based on order entries when an end-user migrates from Qwest service to CLEC UNE-P service and wishes to retain DSL service. Qwest II Simpson Reply Decl. ¶ 8. This modification was transparent to CLECs and consisted of adding a field identifier (“FID”) of “ADSL” on service orders. As Ms. Simpson stated, Qwest implemented this change on July 11, 2002.

The addition of the new FID has alleviated CLEC concerns about DSL disconnects during conversion of UNE-P customers. Between July 26 and September 23, Qwest processed 201 UNE-P orders which included DSL service with no outages.¹ The fact that there was not a single DSL disconnect on UNE-P conversions during that time amply demonstrates that CLEC concerns have been successfully addressed and that this issue has been resolved.

¹ The only outage Qwest recorded during that time occurred on an unbundled loop, not on UNE-P.

Status of Line Sharing Service Order Completions

As described in the Reply Declaration of Karen A. Stewart in WC Docket No. 02-189, Qwest implemented quality control measures designed to address CLEC concerns that Qwest was sending service order completion notices (“SOCs”) on line sharing installations to CLECs before the work was actually completed by Qwest technicians. Qwest II Stewart Reply Decl. ¶¶ 35-42. Although Qwest did not agree that this was a significant issue, it wanted nonetheless to ensure that the potential for premature SOCs was addressed and monitored. *Id.* These measures went into effect by July 11, 2002.

First, Qwest central office technicians were instructed to complete line sharing orders by 4:00 p.m. each day and to manually complete each order, thus allowing for an affirmative confirmation that the physical work had been completed. Next, the new policy called for identification of all line sharing orders that are not complete by 4:00 p.m. local time. Inquiries into the provisioning status of these orders result in either completion of the order or positive jeopardy notification to the CLEC that the order may not complete on the desired completion date. Through this process, care is taken to ensure the billing “N” order also is placed in jeopardy status.

Qwest began tracking the results of this added step in the line sharing installation process and is convinced that the occurrence of SOCs on line sharing orders that have not been completed by the technician in the central office is *de minimis*. For example, in August, the first full month of tracking the results of the manual completion process, in the nine application

states, only 11 orders out of 1619, or 0.7% of CLEC change orders, auto-completed and therefore had any potential to have been completed prematurely.¹

Qwest believes that this level of success with a newly implemented manual completion process indicates that premature service order completions are not a significant issue for line sharing, and that this issue therefore can be considered resolved.

¹ A change order (or “C order”) is the actual service order that generates the central office line sharing work on an existing local exchange line.

Status of Treatment of Line Sharing Outages

In its Reply Comments in WC Docket No. 02-148, Qwest stated that it would implement a change in how line sharing outages are categorized. Qwest I Stewart Reply Decl. ¶¶ 45-46. With the implementation of this change, line sharing outages are now classified as “out of service” rather than “service affecting,” so that line sharing outages and voice service outages are now treated comparably. Qwest stated that this change would go into effect on August 16, 2002. *Id.*

Qwest has implemented the change as promised. In fact, Qwest was able to put this new approach to line sharing repairs into effect by July 29, 2002, more than two weeks ahead of schedule.

As expected, the change in categorizing line sharing outages may have had a positive effect on Qwest’s commercial performance for maintenance and repair. For example, MR-4 and MR-6 improved regionwide in the month of August. See Qwest Regionwide Commercial Performance Results, September 2002, at 238-42 (MR-4, MR-6).

As discussed in the Qwest I Stewart Reply Declaration, Qwest believes that CLEC requests for delayed repair appointments and joint meets for repair testing beyond the first 24 hours are contributing to the Qwest commercial results for MR-3, MR-4 and MR-6. Qwest I Stewart Reply Decl. ¶¶ 47-50 and Exhibit KAS-4. Ms. Stewart stated that Qwest had begun the work to determine how to identify and track these CLEC-requested delays (*i.e.*, lack of access situations for repair) and to exclude the requested delay time

from the appropriate PIDs. *Id.* ¶ 48. Qwest has virtually completed this process, and will be notifying CLECs within two weeks of the date of this refiled Consolidated Application regarding how these requested delays will be identified and appropriately excluded from MR-3, MR-4, and MR-6. Qwest believes the net result of this change will be that the Qwest commercial PIDs will more accurately reflect the quality of repair service Qwest is offering and providing to CLECs.

In summary, Qwest is confident that these steps will address any potential concerns about Qwest's repair performance for line sharing.

Status of Router Testing for Line Sharing

During Qwest's 271 application process, Covad requested that Qwest perform "router testing" during line shared loop provisioning. In workshop negotiations with Covad, Qwest agreed to perform LSVT tests. As even Covad acknowledges, ¹ LSVT tests ensure that electrical continuity (i.e., connectivity and polarity) exists. Qwest did purchase and make LSVT test gear available in every central office with line sharing equipment by December 2001 as committed to Covad. Thus, Qwest already has a quality-assurance system in place to ensure physical continuity of the line between the main distribution frame ("MDF") and the DSLAM. ²

However, in an effort to continue to work collaboratively with its CLEC customers, and to meet their expressed needs, Qwest agrees to develop a router testing option as part of its line shared loop provisioning process. The initial terms and conditions for this testing option are as follows:

- The CLEC must provide DSL type (CAP, DMT, G.Lite) information on the line shared loop LSR. This is necessary to allow the router test device to talk to the CLEC owned DSLAM. New USOCs and FIDs will be required to facilitate passage of this information.
- Router testing for line shared loops will be performed using the same Qwest DSL test set used for Qwest retail DSL service.
- Router testing will be performed only to determine the physical connectivity between the MDF and the CLEC provided DSLAM, and not to test data services.

¹ See Stewart ROC II Reply Decl. at ¶ 52.

² See Stewart ROC II Reply Decl. at ¶¶ 44-58.

- Router testing will be performed only in those central offices where the Qwest DSL test set has already been deployed. There are approximately 55 central offices where line sharing equipment is installed and Qwest has not deployed the DSL test sets.
- Where the Qwest DSL test set is not available in the central office, Qwest will perform the LSVT test.
- When the CLEC chooses not to provide the type of DSL, Qwest can only perform an LSVT test during provisioning.
- The optional router testing is not available when the CLEC uses MVL-type DSL, since MVL is not supported by Qwest's DSL test set.

Qwest will make every effort to complete implementation of this testing option by the end of the fourth quarter, 2002. Qwest is unable at this time to provide a more definitive date due to the interplay of business process changes, timing of a Telcordia software enhancement to allow for additional jeopardy codes, and successful completion of the Qwest Change Management Process.

In sum, Qwest believes it has processes in place to test the physical continuity of the high frequency portion of the loop and provides CLECs with quality line shared installations.³ However, to the extent that CLECs are convinced that router testing will provide additional testing assurance, Qwest will make this option available in the near future.

³ Qwest's consistently good commercial performance for line sharing installations in the states included in this Application, described in Qwest's original Applications and updated through the filing of performance data through August 2002, supports this conclusion. See Stewart ROC I Line Sharing Decl. at ¶¶ 44-53; Stewart ROC II Line Sharing Decl. at ¶¶ 45-52.

Response to Price Squeeze Questions (Montana)
and Status of UNE Rates (Washington)

As explained in Qwest’s previous submissions (*e.g.*, Qwest I Brief at 186-89), the “price squeeze” claims raised by the non-facilities-based CLECs are flawed simply as a matter of law for the following reasons (among others): (1) Congress required regulators to set UNE rates on the basis of *cost*, not profit margins; (2) Congress therefore neither designed nor expected a cost-based platform to help CLECs recruit customers that an ILEC serves at *below-cost* rates through various subsidy mechanisms; (3) for such customers, Congress entitled CLECs to resale of an ILEC’s retail services, for which CLECs pay a wholesale rate stepped down from the incumbent’s retail rate; and (4) “it would not be in the public interest to deny a section 271 application simply because the local telephone rates are low.”¹ As Qwest further demonstrated in its Application and Reply Comments in WC Docket No. 02-189,² CLECs seeking to serve residential customers in Montana can earn positive margins between \$4.73 and \$6.19 in every density zone through section 251(c)(4) resale. The Commission has made clear that resale must be considered in any price

¹ *Vermont 271 Order*, 17 FCC Rcd at 7664 ¶ 68; *accord New Hampshire/Delaware 271 Order*, ¶ 161. In fact, because Section 271(d)(4) bars the FCC from “extend[ing] the terms used in the competitive checklist,” the Commission could not (even if it wished to) lawfully construe the “public interest” standard to impose new “top-down,” margin-related pricing requirements *for UNEs* instead of, or in addition to, the “bottom-up” cost standard prescribed by Section 252(d)(1) and incorporated by reference in the checklist.

² See Qwest II Brief at 188-92; Thompson Montana Pricing Decl. ¶¶ 24-31 & Exh. JLT-MT-6; Qwest II Reply Comments at 116-22; Thompson Pricing Reply Decl. ¶¶ 68-100; Reply Exh. JLT-12.

squeeze inquiry, and that resale “provides a profit margin” even where “the costs of individual elements exceed the retail rate.” See, e.g., *Vermont 271 Order*, 17 FCC Rcd at 7664 ¶ 69. Moreover, even with regard to UNE-based competition, positive margins ranging from \$2.41 to \$2.85 are available to CLECs in every zone in Montana for provision of residential service to those customers that produce merely average toll, access, and feature revenues.³

Qwest now provides additional evidence confirming that, using the UNE-P, CLECs in Montana can earn large positive margins serving substantial numbers of residential customers, meaning they are not “doomed to failure” in the residential market.⁴ First, there are substantial numbers of residential customers in Montana who have demonstrated their willingness to purchase high-margin-generating packages of multiple vertical features, and whom CLECs can profitably target. Customers representing fully 22% of Qwest’s residential access lines in Montana pay an additional \$16.22 per month on top of all other service charges to subscribe to “Custom Choice,” a package of twenty vertical features. Exhibit 10-1 demonstrates that end users who

³ By comparison, the Commission found a \$2.76 margin sufficient to permit competitive entry in the South Carolina residential market. See *Alabama/ Kentucky/ Mississippi/ North Carolina/ South Carolina 271 Order*, ¶ 284.

⁴ *Sprint Communications Co. L.P. v. FCC*, 274 F.3d 549, 554 (D.C. Cir. 2001); see *Georgia/Louisiana 271 Order*, 17 FCC Rcd at 9179-80 ¶ 286; *Vermont 271 Order*, 17 FCC Rcd at 7664 ¶ 70. This additional evidence, which supplements the Thompson Montana Pricing Declaration, is presented in the same format as Exh. JLT-MT-6 thereto. In particular, Exhibit 10-2 is identical to Exh. JLT-MT-6, except that it also factors in revenue from federal universal service funds and the amortized costs of non-recurring charges.

purchase the equivalent of Qwest's "Custom Choice" package, and who generate average access and toll revenues, would offer CLECs substantial margins -- ranging from about \$14.50 to almost \$15.00 -- in every density zone in Montana.

Second, the Commission has made clear that any price squeeze analysis must account for the CLECs' "ability . . . to leverage their presence in the long-distance or business markets . . . into an economically viable residential telephone service business." Vermont 271 Order, 17 FCC Rcd at 7664 ¶ 71. Exhibit 10-3 details the margins available to CLECs that provide local exchange service to Montana business customers. Like the analysis presented in Exh. JLT-MT-6 to the Thompson Montana Pricing Declaration (which focused on residential customers), this attachment presents four "cases." "Case A" represents a business customer who purchases only basic service with no additional revenues; "Case B" represents a business customer with low additional revenues (basic service plus 50% of average additional revenues); "Case C" represents a business customer who provides an average amount of additional revenue (basic service plus average additional revenues); and "Case D" represents a business customer who offers the local exchange carrier a high degree of additional revenue (basic service plus 150% of average additional revenues). As this analysis demonstrates, the average (Case C) business user offers a CLEC a margin ranging from \$25.35 to \$25.79 in every density zone. A high-end (Case D) business user offers margins between \$30.99 and \$31.43. And even a "Case A" business end user, who supplies no

revenue beyond those associated with basic service, provides margins of more than \$14.00 in every zone.

Qwest also notes that, on August 30, 2002, it filed tariff revisions with the WUTC to reflect new UNE rates and a proposal to deaverage the HUNE rate (Docket No. UT-021121). Thereafter, in order to address WUTC and Staff concerns that a deaveraged HUNE rate would be inconsistent with a prior WUTC order, on Sept 25, 2002, Qwest offered to withdraw the deaveraged rates and refile a flat rate of \$2.00 (reduced from \$4.00), to be effective September 29, 2002. Revised tariff sheets were filed on September 25, 2002. The WUTC allowed the rates to become effective on the stated effective date.

Application of the Switching Carve-Out

Effective September 25, 2002, Qwest revised the manner in which it applies the four-or-more-line switching carve-out. For purposes of calculating applicability of the carve-out, Qwest now counts lines on an end-user location basis rather than on a wire center basis. With this change, Qwest's practices are consistent with the Wireline Competition Bureau's decision in the Virginia Arbitration Order.¹

On September 25, Qwest provided notice of this change to CLECs *via* the Change Management Process. A copy of the notice to CLECs is attached as Exhibit 11-1 hereto. Qwest also posted on its web site on September 25 a contract amendment reflecting the change. The contract amendment is attached as Exhibit 11-2.

Finally, Qwest has revised its Wholesale Product Catalog ("PCAT") for unbundled switching and UNE-P to reflect the change. The revised PCAT language can be found in the attached notice to CLECs in Exhibit 11-1.

¹ *Petition of WorldCom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration*, CC Docket No. 00-218, ¶¶ 360-63 (July 17, 2002). Qwest's revised policy was already in effect in Washington, where the Washington Utilities and Transportation Commission determined in its final order on unbundled switching that lines should be counted on a per-location basis for purposes of the carve-out. See Simpson/Stewart ROC II Switching Decl. at ¶ 21.

Status of Qwest's Policies Regarding UNE Combinations

Qwest will combine for CLECs unbundled network elements that are ordinarily combined in Qwest's network, provided that facilities are available. SGAT § 9.23.1.4. Qwest also commits in its SGAT to combine for CLECs UNEs that are not ordinarily combined in Qwest's network, provided that facilities are available and such combination is technically feasible, will not impair the ability of other carriers to obtain access to UNEs or to interconnect with Qwest's network, and will not impair Qwest's use of its network. SGAT § 9.23.1.5.

Qwest offers the UNE-Platform and the Enhanced Extended Loop as standard UNE combinations. As described in Qwest's SGAT and in the Qwest I and Qwest II applications,¹ Qwest's UNE combination offerings are not limited to UNE-P and EELs: CLECs may order any UNE combination, subject to the conditions described in the preceding paragraph. Because Qwest did not revise its policies when the U.S. Court of Appeals for the Eighth Circuit issued its decision on the Commission's UNE combination rules, it was not necessary for Qwest to adjust its policies when the Supreme Court reinstated those rules.² Qwest's UNE combination policies therefore are consistent with applicable law.

¹ SGAT § 9.23.2; Qwest I and Qwest II Simpson/Stewart UNE Declarations ¶¶ 5, 27-31.

² See *Verizon Telephone Cos. v. FCC*, 122 S.Ct. 1646 (2002); *Iowa Utils. Bd. v. FCC*, 219 F.3d 744 (8th Cir. 2000); see also *Petition of WorldCom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding*

**Status of State Commission Proceedings Addressing Qwest-CLEC
Contracts Filed in Colorado, Idaho, Iowa, Montana, Nebraska,
North Dakota, Utah, Washington, and Wyoming**

On August 21 and 22, 2002, Qwest filed with the regulatory authorities in eight of the nine application states copies of previously unfiled contracts with CLECs that contain currently-effective provisions related to Section 251(b) or (c) matters.¹ These filings were made pursuant to Section 252(e), and the applicable ninety-day statutory period for regulatory approval review will expire November 19 or 20, respectively. Absent earlier Commission action, these agreements will be deemed approved pursuant to the terms of Section 252(e). Qwest also has posted the contracts on its web site and invited other interested CLECs to request such currently-effective provisions pursuant to applicable “opt-in” policies under Section 252(i).

The following is a status report on these filings as of September 27, 2002.

Colorado

Qwest filed sixteen contracts on August 21 and 22, 2002. On September 18 the Commission ordered the consideration of the contracts to proceed in two phases. In Phase One, parties may file comments by October 4 regarding the definition of an interconnection agreement or amendment that must be filed under Section 252(e). Reply comments are due October 9. By October 18, the Commission will rule on the appropriate definition and determine which of the sixteen filed contracts fall under the definition. Contracts that do not fall within the definition will not be reviewed as Section 251 interconnection agreements.

In Phase Two, the parties are to file comments by October 30 on whether the contracts identified by the Commission as

¹ The corresponding filing previously had been made with the Iowa Utilities Board on July 29, 2002.

interconnection agreements in Phase One should be approved. The ninety-day statutory period for regulatory approval review expires on November 19 and 20, 2002, respectively.

Idaho

Qwest filed six contracts on August 21, 2002. The Commission has ordered initial comments to be filed by October 18, and reply comments by November 1. A hearing may occur depending upon the comments. The ninety-day statutory period for regulatory approval review expires on November 19, 2002.

Iowa

On July 29, 2002, Qwest filed fourteen contracts for approval as a compliance filing pursuant to a previous order of the Board. On August 6, the Board issued a procedural order providing for a fourteen-day comment period. No comments were filed, and on August 27 the Board issued its order approving all fourteen contracts. This matter is concluded.

Montana

Qwest filed seven contracts on August 22, 2002. On September 11 the Commission issued a Notice of Application for Approval of Wireline Interconnection Agreements and Opportunity to Intervene and Comment. The Notice allowed parties to intervene and request a hearing by no later than September 23. No party requested a hearing by that date. No CLEC filed a motion to intervene; only the Montana Consumer Counsel did so. Any comments would be due October 3 and would be limited to the grounds for Commission action as identified in Section 252(e)(2)(A) of the Act. The ninety-day statutory period for regulatory approval review expires on November 20, 2002.

Nebraska

Qwest filed ten contracts on August 21, 2002. The Commission notice period expired on September 23 and no comments were filed. On September 24 the Commission issued orders approving all ten contracts. This matter is concluded.

North Dakota

Qwest filed three contracts on August 21, 2002. On August 28 the Commission issued a Notice of Opportunity to File Comments by October 1. As of September 26 no comments had been filed. The

ninety-day statutory period for regulatory approval review expires on November 19, 2002.

Utah

Qwest filed eleven contracts on August 21, 2002. The Commission has referred the contracts to the Division of Public Utilities, which will issue a recommendation to the Commission. If the DPU recommends approval, past practice indicates that the Commission will issue a letter allowing the subject terms of the contracts to be effective 90 days after filing. The ninety-day statutory period for regulatory approval review expires on November 19, 2002.

Washington

Qwest filed sixteen contracts on August 22, 2002. On September 25 the Commission approved eight of the contracts. It is expected that the remaining eight contracts will be considered during the next Commission open meeting scheduled for October 9. The ninety-day statutory period for regulatory approval review expires on November 19, 2002.

Wyoming

Qwest filed four contracts on August 21, 2002. Typical Commission procedure is to provide a 30-day intervention period, and if no party intervenes, the Commission would issue an order approving the contracts at the open meeting following the close of the intervention period. The ninety-day statutory period for regulatory approval review expires on November 19, 2002.

Conversions Through Change Orders

CLECs have expressed concern that Qwest's systems, which generate two separate orders – a Disconnect request and a New Connect request – to convert an end user from Centrex 21 to UNE-P POTS or Resale POTS, create the potential for error. Although these requests are designed to be processed as a mated pair, if either the Disconnect or New Connect request is not processed correctly, the end user may not be converted properly.

Qwest initiated improvements to its processes in its IMA 10.01 release, effective August 2002, so that conversions from Centrex 21 to UNE-P POTS or Resale POTS using Disconnect/New Connect automatically flow-through without manual handling. Qwest then began the code activity necessary so that the conversion process could be effectuated through a single Change Order ("C-Order").

Qwest plans to improve the process for conversions from Centrex 21 to UNE-P POTS or Resale POTS in the IMA 11.0 release, scheduled to go into effect on November 17, 2002. Beginning with that release, these conversions will be handled through the creation of a single C-Order rather than separate Disconnect and New Connect requests. Qwest expects that this change will minimize the number of end users that are not properly converted from Centrex 21 to UNE-P POTS or Resale POTS.

Breakout of UNE-P Star Performance Data

On September 10, 2002, Qwest provided, in response to a request from the Wireline Competition Bureau, data relating to the capture of UNE-P performance results.¹ The submission consisted of a confidential analysis comparing Qwest PID OP-5 UNE-P (POTS + CTX) results for (i) all CLECs in the aggregate, (ii) McLeod and Eschelon, and (iii) all CLECs excluding McLeod and Eschelon. The attached confidential analysis provides the same information for OP-3, OP-4, OP-5 and MR-8.

¹ Letter from Hance Haney, Counsel for Qwest, to Marlene Dortch, Secretary, Federal Communications Commission (Sept. 10, 2002).

State	CO
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PID	Prod_CD	Category	Month	Data	CLEC			
					All	Eschelon	Mc Leod	All Except E&M

THE FOLLOWING PAGES 1 - 26 HAVE BEEN
REDACTED FOR PUBLIC INSPECTION

Selected PIDS and Result Comparisons

State	IA
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PID	Prod_CD	Category	Month	Data	CLEC			
					All	Eschelon	Mc Leod	All Except E&M

THE FOLLOWING PAGES 1 - 23 HAVE BEEN
REDACTED FOR PUBLIC INSPECTION

Selected PIDS and Result Comparisons

State	ID
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PID	Prod_CD	Category	Month	Data	CLEC			
					All	Eschelon	Mc Leod	All Except E&M

THE FOLLOWING PAGES 1 - 13 HAVE BEEN
REDACTED FOR PUBLIC INSPECTION

State	MT
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PID	Prod_CD	Category	Month	Data	CLEC			
					All	Eschelon	Mc Leod	All Except E&M

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REDACTED FOR PUBLIC INSPECTION

State	ND
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PID	Prod_CD	Category	Month	Data	CLEC			
					All	Eschelon	Mc Leod	All Except E&M

THE FOLLOWING PAGES 1 - 23 HAVE BEEN
REDACTED FOR PUBLIC INSPECTION

Selected PIDS and Result Comparisons

State	NE
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PID	Prod_CD	Category	Month	Data	CLEC			
					All	Eschelon	McLeod	All Except E&M

THE FOLLOWING PAGES 1 - 14 HAVE BEEN REDACTED FOR PUBLIC INSPECTION

Selected PIDS and Result Comparisons

State	UT
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PID	Prod_CD	Category	Month	Data	CLEC			
					All	Eschelon	McLeod	All Except E&M

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REDACTED FOR PUBLIC INSPECTION

Washington
Selected PIDS and Result Comparisons

State	WA
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PID	Prod_CD	Category	Month	Data	CLEC			
					All	Eschelon	Mc Leod	All Except E&M

THE FOLLOWING PAGES 1 - 23 HAVE BEEN
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Wyoming
Selected PIDS and Result Comparisons

State	WY
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PID	Prod_CD	Category	Month	Data	CLEC			
					All	Eschelon	Mc Leod	All Except E&M

THE FOLLOWING PAGES 1 - 19 HAVE BEEN
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A

PO-20 – Manual Service Order Accuracy¹

Purpose: Evaluates the degree to which Qwest accurately processes CLECs' Local Service Requests (LSRs), which are electronically-submitted and manually processed by Qwest, into Qwest Service Orders.	
Description: Measures the percentage of Qwest service orders that are populated correctly, in specified data fields, with information obtained from CLEC LSRs. <ul style="list-style-type: none"> Includes only service orders created from CLEC LSRs that Qwest receives electronically (via IMA-GUI or IMA-EDI) and manually processes in the creation of service orders, regardless of flow through eligibility, subject to exclusions as specified below. Includes only service orders, from the product reporting categories specified below, that request inward line or feature activity (Change, New, and Transfer order types), are assigned a due date by Qwest, and are completed/closed in the reporting period. Change order types included in this measurement consist of all C orders with "I" and "T" action-coded line or feature USOCs. Service orders evaluated in this measurement are either (1) those selected randomly ^{NOTE 1} and manually inspected for accuracy as defined herein, or (2) when Qwest develops mechanized capabilities for this measurement as specified in the Availability section below, all service orders satisfying the above criteria. A service order will be classified as "accurate" and thus counted in the numerator in the formula below when evaluation determines that the fields specified in the Service Order Fields Evaluated section below (per the indicated phases), when populated on the LSR, are all accurate, as applicable, on the service order. Accuracy is defined as the contents of the specified fields, in the service orders involved in provisioning the service, matching the information from the relevant fields as provided in the latest version of associated LSRs. 	
Reporting Period: One month	Unit of Measure: Percent
Reporting Comparisons: CLEC Aggregate	Disaggregation Reporting: Region-wide
Formula: $\frac{[(\text{Number of accurate service orders}) + (\text{Number of evaluated service orders completed in the reporting period})] \times 100}{\text{Number of evaluated service orders completed in the reporting period}}$	
Exclusions: <ul style="list-style-type: none"> Cancelled service orders. Orders generated from LSRs with non-fatal errors. Orders that cannot be matched to a corresponding LSR. 	
Product Reporting: <ul style="list-style-type: none"> Resale POTS and UNE-P (POTS) Unbundled Loops (Analog and Non-Loaded 2-wire) 	Standard: 95 percent
Availability: Under Development: <ul style="list-style-type: none"> Phase 0 - Manual, random sampling approach: Jun 02 results reported in the Jul 02 report. Phase 1 - Mechanized approach, replacing manual approach: TBD 	Notes: <ol style="list-style-type: none"> Manually-selected orders will consist of 20 random, qualifying orders per day per product reporting category, specified above, from throughout Qwest's 14-state local service region.

¹ The definitional aspects (i.e., the Purpose section through the Notes section) of this version are the same as the 11 Jun 02 version, except that the standard has been changed from "Diagnostic" to "95 percent." The section on Service Order Fields Evaluated for Phase 0, below, has been updated to clarify the fields and how the fields are evaluated.

PO-20 – Manual Service Order Accuracy (continued)

Service Order Fields Evaluated (by Phase of implementation)			
Phase 0 – (01 Jun 02 Forward) Random sampling approach; Manual comparison of the fields from the Service Order to the LSR:			
	Field Code	Field Name	Remarks
	CCNA	CLEC ID	Order entry validated from LSR Form
	D/Tsent	Date sent to help ID App	Order entry validated from LSR Form
	Name	Name of Customer	Order entry validated from End User or Directory Listings Forms, when applicable
	SANO	Service Address Number	Order entry validated from End User or Directory Listings Forms, when applicable
	SASD	Service Address Direction	Order entry validated from End User or Directory Listings Forms, when applicable
	SASN	Service Address Street Name	Order entry validated from End User or Directory Listings Forms, when applicable
	LD1	LOC	Order entry validated from End User or Directory Listings Forms, when applicable
	LV1	LOC #	Order entry validated from End User or Directory Listings Forms, when applicable
	City	City name	Order entry validated from End User or Directory Listings Forms, when applicable
	PON	Purchase Order Number	Order entry validated from LSR Form
	Date/ FOC'd date	Due Date on Order	Order entry validated from LSR FOC sent to the CLEC
Phase 1 – (Dates TBD) First phase of mechanized measurement:			
	Field Code	Field Name	Remarks
	Same as Phase 0	Same as Phase 0	
Future Phase – TBD in Long Term PID Administration; Additional fields included in mechanization, if any:			
	Field Code	Field Name	Remarks
	TBD	TBD	

PO-20 FILING STATUS

State	Qwest Filing Date	Opposition		Qwest Response	Comments Due Date	Status
		Party	Date			
Colorado	8/19/02	AT&T WorldCom	8/30/02			On September 24, 2002, the CPUC issued Decision No. C02-1029 in Docket No. 02M-259T declining to include PO-20 in the CPAP. The CPUC determined that development of the PO-20 PID should be part of the long term PID administration, consistent with its Decision No. C02-718, dated June 26, at page 74. Docket No. 02M-260T, and that the inclusion of PO-20 in the CPAP should be in accordance with the timeframes set out in that decision.
Idaho	8/19/02	AT&T WorldCom	8/30/02	9/13/02		The IPUC Staff is evaluating the filing and is expected to prepare a recommendation for the Commission.
Iowa	8/19/02	AT&T WorldCom	9/3/02	9/12/02		The IUB is expected to issue a decision in the near future.
Montana	8/19/02	AT&T WorldCom	8/30/02	9/18/02	9/18/02	The MPSC has the issue scheduled for a work session on October 1, 2002 and is expected to make a decision at that time.
Nebraska	8/19/02	AT&T WorldCom	8/29/02	9/19/02		No procedural dates or process have been established.
New Mexico (QPAP)	8/20/02					In the QPAP decision issued on August 13, 2002, the NMPRC directed Qwest "to include PO-20 in its NM QPAP consistent with the commitment Qwest is on record as having made for the states for which it presently has pending section 271 applications." (Page 9, Paragraph 21.) Qwest has submitted its compliance filing.
North Dakota	8/19/02	AT&T	8/29/02	9/19/02	9/19/02	The NDPSC Staff is evaluating the comments and will make a procedural recommendation to the Commission.
Oregon						Oregon's filing is being held by the Staff at Qwest's request to be supplemented with updated long term PID administration information.
Utah	8/19/02	AT&T	9/3/02	9/16/02		No procedural dates or process have been established.
Washington	8/19/02	AT&T	8/22/02	9/16/02		On 9/24/02, the WTUC approved Qwest's request to include PO-20 in the QPAP on an interim basis on the condition that Qwest work collaboratively with CLECs and other members of the ROC TAG to refine and modify the measure and that the measure be subject to review and modification at the six-month review.
Wyoming	8/19/02	AT&T WorldCom	8/30/02	9/16		The WPSC will consider the procedure for PO-20 at an open meeting to be held during October 2002.

Open System Change Requests -- Detail

we'll open one.

A question was asked whether you have to sign up for the new functionality.

Connie Winston/Qwest said that yes, via your User Profile.

Liz Balvin/WorldCom asked if this is available through both GUI & EDI

Connie Winston/Qwest said yes. It follows your user profile.

Mike Buck/Qwest asked if there were any objections on the phone or on the bridge to updating the status of this CR to "Completed." There was no objection. The status will be updated to "Completed."

Qwest Draft Data Description**Performance Dimension:** Service Order Accuracy – via Call Center Data**Updated:** August 26, 2002**Basis:** Customer calls to Qwest's service delivery centers reporting LSR/service order discrepancies.**Purpose:** Provide an aggregate estimate of service order accuracy based on customer calls to service delivery centers.**Initial Illustrative Criteria for Implementation:**

- Includes calls with received date in reporting month, counting only the first call per order and only those that are dealing with verified order inaccuracies (i.e., orders that do not match what was ordered on the CLEC Local Service Request (LSR)) that were caused by Qwest.
- Where calls refer to multiple orders, count each such call one time for each unique N, T, or C class order. For example, if a call refers to five unique orders, count it five times in the numerator of the formula below.
- Rules governing the orders to be included in the formula below are the same as the rules used in the OP-5 PID (e.g., inward line activity only, average of current + previous month volumes, etc.).

Units of Reporting: Percent**Reporting Levels:** Statewide aggregate for all products listed in provisioning PID, OP-3.**Initial Draft Formula:**

Percent Order Accuracy = $\left[\left(\frac{\text{Number of inward line orders completed in the [prior + current months]} }{2} \right) - (\text{Number of calls received in the reporting period that report valid order errors}) \right] \div \left(\frac{\text{Number of inward line orders completed in the [prior + current months]} }{2} \right) \times 100$

Availability: July 2002 data and beyond.

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

Meeting Minutes**Treatment of
SCR082302-01EX (Implementation of Multiple CRs Prior to IMA 12.0)
As an Exception to CMP****September 19, 2002 2 p.m.
Inverness Hotel – Conference Room D****Meeting Start Time: 10:15 a.m.**

NOTE: The meeting began at 10:15 a.m. MT. The meeting took place as an agenda item during the September Monthly Systems CMP Meeting. The Exception component of the meeting was originally scheduled for 2:00 p.m. but was rescheduled to 10:15 a.m. at the request of and without dissent from the CMP meeting attendees.

PURPOSE

The purpose of the Exception Meeting was to decide whether to treat SCR082302-01EX (Implementation of Multiple CRs Prior to IMA 12.0) as an exception to the CMP. A vote was planned and noted in the agenda.

ATTACHMENTS

NOTE: Because the exception meeting took place as an agenda item on the Monthly Systems CMP Meeting a full list of CMP Meeting attendees can be found in the meeting attendees list for the September Monthly Systems CMP Meeting.

MEETING MINUTES

Michael Buck/Qwest — Introduced the exception request (SCR082302-01EX) from WorldCom and asked Jeff Thompson/Qwest to do a recap of the request and the analysis done ~~to date.~~

Jeff Thompson/Qwest — The request seeks to implement two CRs from the IMA 12.0 prioritized list by December 31, 2002. The two CRs are SCR060702-01 (Migrating Customers using the Conversion As Specified Activity Type) and SCR061302-01 (Migrate UNE-P Customers by TN). They were ranked #2 and #19, respectively, during the IMA 12.0 prioritization process.

Qwest has analyzed the CRs and the request to deploy by the end of 2002. The nature of the CRs requires all the functions for CLEC-impacting candidates be done, including: technical specifications, production migrations, testing, training etc. All of these activities are typically done as part of a major release effort. Therefore, implementation of these two specific CRs would require a major release effort. Qwest examined the feasibility of implementing these CRs in the next scheduled major release (in November.) However the November release is too far along at this point for these CRs to be added. There is the IMA 11.1 point release in January. So we could convert those resources and create a new special major release for these two CRs. The new special major release could be delivered in January 2003. Both SATE and IMA could be delivered at the same time. If that's not acceptable to CLECs, SATE could deliver in January with delivery of the IMA special major release in February. The working assumption for the analysis that Qwest has done was that WorldCom's desire to accelerate these CRs would mean implementing these in January. However, for the most part, the implications of early delivery apply regardless of when the special major release would be delivered.

Qwest then looked to determine the work impacted. Implementing a special major release for these CRs in the timeframe noted would require a very aggressive development schedule creating a lot of risk to the release itself. The risk is that there is less time to recover from any issues, known or unknown, which may come up. With a

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

normal release schedule, there is time to correct issues. In this case, however, with an accelerated schedule, there would be minimal time for corrections.

Associated functions for documentation and training would also be impacted. Disclosure of technical specifications would probably be missed by about 30 days. Instead of the required 73 days for disclosure of draft technical specifications, Qwest would have to deliver them around 45 days or sometime around then. This leaves less time for CLECs to implement required changes on their side. Such compression of the timeline cascades down from there. Training for 11.0 would have just been completed so there would be back training which would affect both Qwest and the CLECs.

To accelerate these two CRs would also require resources to be diverted from the 12.0 development efforts. Qwest would augment the IMA 11.01 point release resources with resources from the IMA 12.0 release. That would result in pulling those resources away from the IMA 12.0 release work. Based on the Levels of Effort (LOE) given today, it is anticipated that about 13,000 hours would need to be pulled from the IMA 12.0 release to get these two CRs done in time. It would appear at this point that, in addition to the two CRs being discussed, another candidate from 12.0 would also need to be dropped. There are currently two CRs tied for #17 and an assessment would need to be made in order to determine which CR would need to be dropped. Jeff reviewed the two CRs that are tied for #17 priority.

In addition to consequences for acceleration and resources, we (Qwest and CLECs) have agreed to the CMP which has established rules for governing how we do business together (i.e. Qwest and CLECs). This exception would break some of those agreements. It would break the agreement of not having major releases 3 less than months apart. Also because these releases are so close together, implementing these two specific CRs early would impact sunset dates. As Bonnie Johnson/Eschelon alluded to before, there are only 3 hardware platforms. Because the special major release would need to be deployed on one of those platforms, other major releases would need to be retired earlier than currently planned. The sunset for IMA 10.0 would be April, possibly March. This is a constraint of Qwest's hardware operating environment.

This acceleration would also overturn the prioritization process by taking CRs #2 and #19 out of order and putting them in an earlier release. This would also result in overturning two previous unanimously approved exception CRs. The CR submitted by Qwest (SCR080502-01EX – Exception to Section 10.2.2 for IMA 12.0 Prioritization) to have 12.0 worked with 50% LOSG candidates and 50% from the prioritized list, and the CR submitted by WorldCom (SCR081402-01EX – Exception to Section 10.2.2 for IMA 12.0 Prioritization) to have 12.0 be 100% from the prioritized list.

In some of the previous dialogue, WorldCom had asked where these candidates were in the development phase. They are currently in definition.

Jeff Thompson/Qwest — That's where we're at. This is an assessment of what it would take to do these two specific CRs in an early special major release. Are there any questions?

Liz Balvin/WorldCom — WorldCom only brought these CRs forward because of an Ex Parte conversation that Qwest had with the FCC. Qwest indicated that Section 16 could allow for expedited treatment outside of a normal planned release. Qwest went on to say that no CLECs had requested these two CRs to be implemented prior to 12.0. Therefore WorldCom felt this was an option that we could pursue. It seems to WorldCom that the exception process does not appear to be an option. I believe there are some restrictions in the CMP document, not only the ones Jeff just referenced – 'three months in-between a major release' – plus it requires having 3 majors a year. Jeff talked about all the things that would have to be changed, but the biggest impact will be on resources which you will always have and that's why this is a unanimous vote. Just to reiterate, these are critical CRs to WorldCom. In Qwest's response, they indicated that they are currently defining the top 19 CRs. If we could get it by April, that would benefit us as well. We would not have pursued this if Qwest had not said this was an option to the FCC.

Judy Schultz/Qwest — I do think the exception process is an option for requests like this. With more lead-time, there may have been more options for this request. It may have been possible to include these CRs in the IMA 11.0 release. I don't want to discourage anyone from considering the exception process. In this case, it really is a timing issue.

Liz Balvin/WorldCom — I think this is a timing issue regardless, it will be impacting to resources throughout the year.

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

Judy Schultz/Qwest — There will always be ramifications, but, if the exception CR is submitted early enough, there would be time to work through the issues. Again, in this case, if the request had been submitted earlier, it could potentially have been addressed in the IMA 11.0 release.

Jeff Thompson/Qwest — The ramifications will be different each time, depending on the nature of each exception request. There have been other exception CRs, like the next exception CR, for example, where the ramifications are different. The exceptions need to be treated individually and this forum is where we get to discuss whether we want to head down the path of an exception. This doesn't invalidate the process but demonstrates that the process works.

Liz Balvin/WorldCom — And you won't know what those ramifications are until you submit the CR. WorldCom also doesn't want to discourage anyone from using the exception process. It seems that for getting CRs in prior to a scheduled major release, the only option seems to be the SCRCP where you pay for resources and then it wouldn't impact anything.

Jeff Thompson/Qwest — Clearly bringing on additional resources would lessen the constraints. However, the SCRCP should not be characterized as the only option.

Mike Buck/Qwest — Asked if there were other comments or questions. No comments.

Mike Buck/Qwest — Reviewed the quorum calculation. The results of the quorum calculation indicate that 7 or more carriers constitute a quorum. Mike also reviewed the list of carriers in attendance at the meeting. Mike reminded everyone that this was a unanimous vote as discussed and agreed to in the ad hoc meeting. He pointed to the notice included in attachment P describing what was meant by "Yes" and "No" votes. He also read from the Wholesale CMP Process document section 16.4.1, which indicated that the vote is "taken only to determine whether the Exception Request will be handled on an exception basis. The requesting party may still pursue its desired change through the established CMP."

Bonnie Johnson/Eschelon — Commented that if you vote "yes" you support going forward with this exception CR if you vote "no" it will not go forward.

Liz Balvin/WorldCom — Reminded everyone that the notification indicated a "yes" vote was a preference for Qwest to allocate the resources to go forward with December date. She indicated that WorldCom chose not to change the date requested for implementation of these CRs to January. She asked to be sure that the e-mailed vote is also read out.

AT&T — No

Covad — Abstain

Eschelon — No

McCleod — No

NC Telcom — Abstain

Popp Communications — Abstain

SeviSense — Yes

Time Warner Telecommunications — Yes

USLink — Yes

Vartec — Yes

WorldCom — Yes

Z-Tel — Yes

Allegience — No

Qwest — No

Integra — No

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

Mike Buck/Qwest — Confirmed that all carriers in room and on call were accounted for. Indicated that the request to treat these two CRs on an exception basis as described was not agreed to by a vote of 6 “No” votes, 6 “Yes” votes, and 3 “Abstain” votes.

Mike Buck/Qwest — Asked if there were any other questions. There were none.

Open System Change Requests -- Detail

CR #	Title	Status	Level of Effort	Report Record # 1	
				Interface Release #	Products Impacted
SCR082302-01EX	Exception Request to Implement Multiple CRs Prior to IMA 12.0	Submitted		IMA Common	
		8/23/02			

Originator: Balvin, Liz

Originator Company Name: WorldCom

Director: Thompson, Jeff

Owner: Thompson, Jeff

CR PM: Stecklein, Lynn

Description Of Change

As excerpted from an August 22, 2002 email from Elizabeth Balvin/WorldCom to Michael Buck/Qwest -

"Exception:

To implement the following CRs SCR060702-01 Migrating Customers using the Conversion As Specified Activity Type and SCR061302-01 Migrate UNE-P Customers by TN prior to IMA 12.0 planned production release of April/03.

Description of request with good cause for seeking an exception:

Qwest is currently not industry compliant because of its requirements surrounding migrate as specified and the fact that migrate by TN currently is not available. Currently, when migrating as specified, CLECs are obligated to differentiate between features the customer already has and features the customer desires for the first time. They are also forced to include the customer's service address and customer code on every order, and must retrieve new customer codes before submitting supplemental orders. The requirement for additional information places the burden on CLECs to pull, populate and verify information prior to order submission -- all steps that reduce efficient ordering and provides greater room for error. NOTE: Requested migrate as specified capabilities existed prior to IMA release 6.0.

Desired outcome:

That the migrate as specified and migrate by TN CRs are implemented by Qwest per OBF guidelines no later than the end of 2002.

Supporting documentation:

1) "Qwest's Wholesale Change Management Process Document - 7/10/02", section 16.0 states "If the Exception Request is for changes to CMP timelines and sets forth specific dates for completion of tasks, a two-thirds majority vote will be required unless Qwest or a CLEC demonstrate, with substantiating information, that one of the criteria for denial set forth in Sections 5.1.3 or 5.3 is legitimately applicable. If one of the criteria for denial will cause such an exception request to be rejected, the requestor may withdraw the specific dates from its exception request at the meeting where it is discussed, in order to have the two thirds majority vote apply to the request." Thus WCom believes a two-thirds vote would be required to implement the requested changes prior to IMA 12.0 planned production release date of 4/03.

2) Qwest's Ex Parte dated August 13, 2002 addressing the staff of the Wireline Competition Bureau requests states "The Exception Process, specified in Section 16 of the CMP, provides the ability for a CLEC or Qwest to request a deviation from the CMP. This process could be used to request expedited treatment or implementation outside of the normal planned release". Thus WCom requests the identified CRs be implemented outside the normal planned IMA release date of 4/03.

VOTE: That CRs SCR060702-01 Migrating Customers using the Conversion As Specified Activity Type and SCR061302-01 Migrate UNE-P Customers by TN are implemented by Qwest no later than the end of 2002. A "yes" response would require Qwest to implement by the end of 2002. A "no" vote would require the CRs to follow the processes currently imposed by the Qwest Wholesale Change Management Process Document."

Status History:

Date	Action	Description
8/23/02	CR Submitted	
8/23/02	CR Acknowledged	
8/27/02	Communicator Issued	Notice CMPR.08.27.02.F.01320.CMP_Meeting_Vote issued
8/28/02	CLEC Provided Information	Requests to discuss issue in re-design received from Eschelon and WorldCom (see Project Minutes for details)
8/30/02	Communicator Issued	Notice CMPR.08.30.02.F.01322.Ad_Hoc_CMP_Mtg issued
9/04/02	Communicator Issued	Notice CMPR.09.04.02.F.01323.Ad_Hoc_Mtg_Revision issued

Information Current as of: Friday, September 27, 2002

CR # SCR082302-01EX

Report Name: rptOpenDetailed CR INDIVIDUAL REPORT SYSTEMS

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9/10/02	Communicator Issued	CMPR.09.10.02.F.01324.Ad_Hoc_Mtg_Material
9/19/02	Discussed at Monthly CMP Meeting	SCR082302-01EX discussed at September Systems CMP Monthly meeting; please see Systems CMP Distribution Package September CMP -- Attachment P

Project Meetings

Meeting Minutes Ad-Hoc meeting for WorldCom CR SCR082302-01EX Wednesday September 11, 2002 @ 11:00 a.m.
Bridge Call open to all CLECs This meeting was held to discuss the questions raised around WorldCom's exception request SCR082302-01EX. MBuck/Qwest held roll call and reviewed all of the participants that were on the conference bridge. Everyone in the room announced themselves. Michael stated that the purpose for this ad hoc meeting was to discuss the questions raised regarding WorldCom's exception request. He provided a brief overview of the CR and he pointed to the notice that went out with the questions and answers. The questions: 1. More details provided by Qwest to better understand if this change request is approved, what would be the end result impact? What in addition to timeline changes (disclosure documentation requirements) does Qwest believe will apply?
What is the progress to date surrounding these CRs? "Migrate as specified" business development requirements should have begun as of July 26, 2002.
Did Qwest account for the fact that migrate as specified functionality existed prior to IMA 6.0 when estimating its man-hours? Has there been any analysis performed on "migrate by TN" (synergies?). Are the man-hours established for "migrate by TN" still considered appropriate? How would Qwest resources be diverted
How would the 12.0 prioritization list be impacted? What additional man hours would be estimated? What "voting" standard must apply (2/3rds or unanimous) Is it possible to treat the CRs separately given their 12.0 ranking status? Example: "migrate as specified" will be implemented in April/03, would only "timeline" changes apply?, thus 2/3rds vote 3. What other options are available to address the Exception CR and lessen the impact on the 12.0 release?
J Thompson/Qwest Reviewed the analysis that was done in answer to the questions that were submitted by WorldCom. He noted the 2 CRs that WorldCom has asked to have accelerated. Jeff spoke to the high level points included in the detailed feedback Qwest had provided. He noted that both CRs are CLEC impacting candidates that affect GUI & EDI, therefore the activities associated with a major release must be done. Therefore, this leads to the need for a major IMA release. Qwest looked at the schedule and determined that the development process is too far along the path for IMA 11.0 to get these two CRs included in the IMA 11.0 release so Qwest ruled that out. Qwest has a point release (IMA 11.1) scheduled for January. The most doable thing would be to convert the planned point release to a major release, leave it in January, and do required additional activity that is associated with a major release (including SATE). Qwest would probably deliver SATE in conjunction, in January because of the schedule. If Qwest and the CLECs can't agree to do that, then Qwest could push the new major release out to February and deliver SATE in January. Because the request is to have it done by December, Qwest evaluated the possibility of the January date. Regardless of the date, scheduling a new, accelerated major release has the following implications:
1 This would produce a short schedule for Qwest and CLECs. If CLECs want to benefit from this acceleration, they would have to do work to assume those benefits.
2 The acceleration of candidates carries its own risks. The development scheduled is shortened by 2 months. If something goes wrong, Qwest doesn't have as much time to recover as there would be on an April delivery schedule, causing Qwest not to deliver on time. He noted that it's just risky.
3 All the documentation would be less than the 73-day requirement. Because of the short, aggressive timeline, Qwest probably wouldn't be able to make the 73 days for technical specs. The DRAFT specs would probably come out at the time the finals would normally come out.
4 Training on 11.0 will have just been delivered. More training schedules will have to be released. There will probably be some overlap causing back-to-back training.
5 Resources would be taken away from 12.0 in order to meet the acceleration. The candidates are using the high end of the LOE because of the nature of acceleration. Qwest doesn't have detailed numbers. Qwest did the estimates using the high numbers (Jeff reviewed the numbers in the response). In addition to the 2 CRs that get pulled up, Qwest and the CLECs would need to figure out which of the 2 CRs that tied for the #17 slot, would be eliminated from the release as well. Those are consequence for accelerating.
6 Impacts to CMP commitments: The CMP process requires that Qwest can't have major releases less than 3 months apart. This would be violated (either with the January release being too close to the November 18 release date for IMA 11.0 or a February release being too close to the April 7th date for IMA 12.0). So that CMP obligation would not be met.
7 Sunset impacts: The process states that Qwest will support the previous IMA release for six (6) months after the next major IMA EDI release has been implemented. J Thompson/Qwest noted that the 3 hardware production platforms are only to support 3 releases. He reviewed the changes in retirement date for 10.0, and noted that we just received a CR to extend that date. He added that the WorldCom request would move shorten the sunset timeframe for 10.0 rather than lengthen it.
8 Noted that there has been a lot of churn on the IMA 12.0 release already. He indicated that CLECs have created issues around the prioritization process and that this is now the third exception on how the IMA 12.0 release should be handled. So far, there has been unanimous agreement on how resources are to be used. This is causing lots of churn and exceptions for resources. Another way to address this would be to invoke the SCR to get additional resources applied. As the CLECs continue to induce churn, Qwest continues to induce change in the way resources are applied to this release. This impacts issues that Qwest has to look at in dealing with this CR. He added that it is important to note that invoking the SCR process would minimize the churn. J Thompson/Qwest Noted that this is the initial take on an additional release. He added that both of the CRs in the WorldCom request are on different Business Requirements schedules for completion and that there has been no synergy identified between them. He added that once the specifications for the changes are completed, Qwest will revisit the LOEs to see if they need to be changed. He concluded by reiterating that this is the summary of Qwest's analysis of the impact of this CR. Bonnie Johnson/Eschelon Asked if Qwest could explain about how this would impact the sunset of IMA 10.0. Terry Wicks/Allegiance Indicated that he has an interest in the IMA 10.0 sunset as well. J Thompson/Qwest Stated that Qwest has 3 platforms. He explained that normally, in this situation, Qwest would run IMA release 10, 11 & 12 on those 3 hardware platforms. When it came time to run 13, Qwest would retire 10 so the hardware would be available to run 11, 12 & 13. So in that scenario, Qwest would retire IMA 10.0 when it is forced to go on 13. IMA 13.0 is currently scheduled for August, because Qwest needs time to prep the platforms. Donna Osborne-Miller/AT&T Asked if Qwest put the WorldCom major release in, then what would the sunset date be. Jeff Thompson/Qwest Replied that 10.0 might sunset as late as April. He added that Qwest would hang on as long as possible to the platform. He added that it might have to be March. And that these are all preliminary assessments. One thing is clear, it would not be May or later. Bonnie Johnson/Eschelon Asked if that would matter if it was the point releases. J Thompson/Qwest Clarified that it wouldn't matter. The fact that Qwest has to create a new code base causes Qwest to change platforms. Liz Balvin/WorldCom Requested clarification around the concept of a major release. WorldCom views this request as a 'mini-major.' What would the impacts be for us as end users? She stated that the changes to CMP

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documentation would be against the 2 CRs only, and asked if that was right. JThompson/Qwest Confirmed that there would be documentation changes. But the impact would be more than just documentation. Qwest must assume that if the CLECs approve this then the CLECs must want to use it. In order to use it they would need disclosure, they need to be able to test, etc. He noted that if the CLECs want to do this, the CLECs must want to use it early. Liz Balvin/WorldCom Stated that her point is that it's not truly a major release because it's not 40,000 hours of coding changes. She noted that because Qwest is using a point release, the functional changes that exist are only based on 2 CRs. JThompson/Qwest Clarified that he was not suggesting Qwest use a point release. He was saying that Qwest could abolish the point release to use the timeslot for the major release. He noted that the definition of major versus point doesn't hinge on LOE, it hinges on level of CLEC impact. The question is whether CLECs would need to make code changes, need a test environment, etc. Adding that if the CLECs are looking at that definition, then the answer is clearly yes, it's a major release. Liz Balvin/WorldCom Indicated that she did understand what Jeff Thompson was saying, but that this release would not be adding any other functional changes but these 2 CRs. JThompson/Qwest Jeff confirmed that the proposed major release would be for delivery of the 2 CRs in question. Delivery of the functionality for these 2 CRs and all the related activities would constitute a major release. Donna Osborne-Miller/AT&T Asked if it would be a major release because of coding impact? Jeff Thompson/Qwest Confirmed that she was correct. Liz Balvin/WorldCom Confirmed that there would be no coding or functionality changes with the currently scheduled point release. JThompson/Qwest Clarified that there is one spillover candidate disclosed as part of the major release, and added that there is no coding impact with that change. Liz Balvin/WorldCom Asked that if this Exception CR was approved, would there be coding changes required for the other CLECs. JThompson/Qwest Confirmed that there would be. Liz Balvin/WorldCom Asked about the comment in Qwest's feedback concerning the 40,000 hours. Qwest will most likely be able to address the top 19 CRs? Does that mean that #19 is going to make it in the IMA 12.0 release? Jeff Thompson/Qwest Indicated that it is too early in the process to say. He indicated that for now Qwest needs to plan as if Qwest is going to make it all the way through #19 on the CR prioritization list. He noted that the process is to complete requirements analysis and communicate that in the packaging discussion in November this year. He added that Qwest would continue with design, then begin code, then provide the final commitment in December.

Liz Balvin/WorldCom Indicated that she has played the numbers game and didn't know how Qwest believes they can get to #19.

JThompson/Qwest Reiterated that this goes back to the way the process is worked. From a process standpoint Qwest must define further down the CR prioritization list than we estimate we will actually get. By doing this, we might find synergies with candidates further down. Also, we might re-LOE some CRs, causing candidates to go higher or lower on the list. It's early in the process, but at this stage, Qwest has to work this list as if this will make it into the release. In November Qwest will bring the results forward to discuss exactly what can make it in the release and why. He noted that right now Qwest has to work it as if it could make the release.

Donna Osborne-Miller/AT&T Mentioned that Liz (Balvin) had concerns about this prior to today. She noted that the Migrate as specified CR existed prior to IMA 6.0. She asked what had happened that caused the CMP process to lose that. JThompson/Qwest Stated that we have had that detailed conversation before in a Monthly Meeting. At a high level, he recapped that there were a series of issues, some concerns around converting the wrong account, adding/deleting the wrong feature, and a whole serious of issues between Qwest & the CLECs, that lead Qwest to beef up how those conversions were done. The result is that more information is required from the CLECs to ensure those service issues did not occur. He added that it morphed into what Qwest believes is the higher quality implementation that exists today. Donna Osborne-Miller/AT&T Noted that she didn't know if a CR came forward in between then and now to change this? JThompson/Qwest Clarified that it was a whole series of smaller CRs that morphed the capability. Terry Wicks/Allegiance Asked if we clarify that this alters timeframes, would the vote be unanimous or two-thirds? JThompson/Qwest Responded that he didn't think the analysis dictated whether it would be unanimous or 2/3. However, he did point out that the analysis shows this Exception Request would change more than just timelines, this would have broader impacts to CMP. Additionally, it would overturn 2 other Exception CRs that were agreed to with the unanimous vote. Terry Wicks/Allegiance Indicated that in order to be prepared for next week's vote, we need to know how the voting would be handled. Donna Osborne-Miller/AT&T Asked for clarification on which 2 unanimously approved Exception CRs would be overturned by the current WorldCom Exception CR. JThompson/Qwest Clarified the two CRs to be overturned: 1) Qwest exception CR regarding full LSOG versus 50/50 and 2) WorldCom exception that sought prioritized 12.0 list versus 50/50. He indicated that there is a different resource issue for 12.0. He referred to the churn issue that he was talking about earlier. Terry Wicks/Allegiance Asked how the CLEC community would go about making the decision.

Liz Balvin/WorldCom Stated that she thinks it is important for WorldCom in dealing with IMA 12.0. She recapped that Qwest came forth to say they wanted the 50/50 option. WorldCom wanted another option and submitted a CR. Looking at the end result, we weren't going to get more functionality for LSOG and it was unanimously voted to keep the list as is. This third Exception CR came as a result of information Qwest provided to the FCC, per section 16, that a CLEC could use this process to request expedited treatment of the release. WorldCom understood this to allow for a change request to change timelines. If you look at the correspondence between Qwest and WorldCom, it will change a lot more than timelines. On one side Qwest is saying this is an option, to the FCC, when WorldCom submits the changes, it truly is not an option, we've been told the real option is SCR. JThompson/Qwest Indicated that the exception process truly is an option. He noted that it is a fact of this particular case, that it might not be a good option because of the impacts. He noted that he could envision other circumstances where it is a good option. The process is there, and it is worth the attempt and it allows the discussion to take place. Qwest has brought forward how we analyzed this. The objection in this case, it seems, is with the outcome. If a CR was submitted to change IMA 19, for example, that would probably work because there is enough lead-time. It's not a problem with the process; it's this specific CR. Liz Balvin/WorldCom Stated that she thought that it was unrealistic to change IMA 19. Noting that it's so far down the pipeline. JThompson/Qwest Commented that he didn't intend a trivial example. The point is that the exception process exists and it works. He noted that with Exception CRs that Qwest had dealt with before, for example: the sunset dates for extending the process, that those CRs had worked.

Liz Balvin/WorldCom Stated that this proves the point that WorldCom's original exception CR cannot be implemented regardless if there is a vote, and that it was evidenced by the correspondence that has been going back and forth. The original intention of the WorldCom CR can't be met. She noted that there's no vote that can change that. It looks like what's on the table is to shift 11.1 candidates and divert the 12.0 resources. It looks like they will implement both by the April timeframe.

JThompson/Qwest Noted that Qwest is working under that assumption today. He added that Qwest can in no way commit to that. He stated that the process says Qwest will deal with that at packaging. Both are in requirements definition, both will be examined and Qwest will get back to the CLECs at the appropriate time according to CMP. Liz Balvin/WorldCom Asked if that is in November. JThompson/Qwest Confirmed that it was. Liz Balvin/WorldCom Asked if the soonest Qwest can do it is with the Jan/Feb proposal. She noted that the CLECs would be faced with all the impacts documentation, training, SATE, sunset.

JThompson/Qwest Confirmed that with current assumptions that was correct. Liz Balvin/WorldCom Asked, where do we sit? She stated that it sounds like our exception CR has been rejected, I need to understand what Qwest's thought is. What's the vote? M Buck/Qwest Stated that he thought it's not Qwest's decision alone, it's a community decision. He stated that from a process standpoint, it would seem that the decision is whether to treat the CR as an exception. He asked what other CLECs thought. Terry Wicks/Allegiance Indicated that if these 2 CRs are implemented as Jeff Thompson/Qwest has attempted to outline, it would result in another release. What affected Allegiance is the sunset of IMA

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10.0 a month earlier because he had planned to request to extend this at least 6-8 weeks later.

Donna Osborne-Miller/AT&T Noted that the whole year's planning is critical to an EDI development person, as well as all of the CMP development deliverables.

Liz Balvin/WorldCom Explained that WorldCom didn't want to change the whole CMP to accommodate these CRs. She noted that WorldCom believed the functionality is critical to their business. She stated that this falls back on the process. It seems that Qwest is rejecting the request. She noted that if the group does move forward with the exception CR, it is not as it was originally intended. M Buck/Qwest Stated that he didn't think Qwest shares the view that the CR is being rejected. The process calls for voting on whether or not to treat the CR as an Exception. The CMP could still vote to treat this as an exception request if WorldCom wishes to do so, noting also that Qwest has outlined the implications and offered alternatives. Terry Wicks/Allegiance Clarified that a vote of yeas that these would be implemented on December 31, 2002. He indicated that the inclusion of a specified date on the exception didn't seem appropriate at this time. He also clarified that there would be no vote at today's meeting. The vote was planned for next Thursday's CMP Meeting. M Buck/Qwest Agreed with that. He stated that is why Qwest believes that the vote should be on whether to treat the CR as an exception. He noted that WorldCom has the option, under the process, to adjust their request in light of new information. Additionally, regardless of when this CR might be done (i.e. December, January, or February) it would still impact the sunset timelines. Terry Wicks/Allegiance stated that this exception has to be unanimous. Donna Osborne-Miller/AT&T Agreed. M Buck/Qwest Stated that Qwest also agreed. Liz Balvin/WorldCom Noted that she thought the vote option that WorldCom has put on the table has changed. Terry Wicks/Allegiance Clarified that the change was from December to February. Connie Winston/Qwest Noted that it would be February if Qwest has to adhere to the SATE implementation in January. She stated that Qwest was going to take a one-moment break from the call to discuss the issue. M Buck/Qwest Stated that Qwest is trying to answer the question as to what the vote is that we go forward with. If WorldCom wants to remove or adjust the dates, Qwest can do that, or we can go forward with it the way it's written. Again, the question is whether to approve an exception to the process. Liz Balvin/WorldCom Stated that this will always happen. It's going to be an ongoing problem. M Buck/Qwest Stated that that's a result of the process that's been agreed to. Liz Balvin/WorldCom Replied that she doesn't believe that the option that was provided to the FCC is truly an option. Connie Winston/Qwest Responded that the Exception process is certainly always an option. She noted that it's the specifics of a particular CR that drives its feasibility. Adding that it's not that Qwest doesn't want to look at the options. She noted that sometimes it will work.

Liz Balvin/WorldCom Stated that it seems Qwest cannot accept the original request. So going forward, does Qwest reject this CR, or do you expect Qwest to change the CR? Bonnie Johnson/Eschelon recalled that there was one of these a couple of months ago. She noted that we did collectively agree that since Qwest was unable to meet the original request that the CR be denied. M Buck/Qwest Clarified that the one Bonnie was thinking of was not an exception request.

Bonnie Johnson/Eschelon Agreed with Michael that the previous example was not an Exception. She stated that she thought there was another CR like this that was discussed. Liz Balvin/WorldCom Stated that she did recall that too and that she thought that was what we're faced with today.

M Buck/Qwest Stated that he thought the example we are looking for here is the Covad exception where Qwest was requested to move the sunset date beyond a date that Qwest could accommodate. After consultation between Covad and Qwest, Covad changed the date in their Exception CR and the CR was unanimously accepted. Terry Wicks/Allegiance Stated that we need to vote on whether to accept this as an exception CR. M Buck/Qwest Stated that Qwest agrees and believes we are voting on whether or not to treat this as an exception. Liz Balvin/WorldCom Explained that the WorldCom CR is requesting a specific date and that Qwest is saying that it can't meet the date. M Buck/Qwest Mentioned that if WorldCom choose to go forward with it as an exception, Qwest is prepared to vote on is whether to treat this as an exception. He stated that he believed that the question goes to all the CLECs. Qwest was asked to examine the risks and had done so. Based on the feedback and impacts Qwest has identified, Qwest and the CLECs need to decide whether there is a desire to consider this request as an exception to the process. Determining whether the impacts are acceptable, regardless of the date, is the purpose of voting whether to treat the CR as an exception. Liz Balvin/WorldCom Stated that the key is that Qwest is asking WorldCom to remove the date. M Buck/Qwest Stated that he didn't believe that Qwest was asking WorldCom to remove the date. He noted that the interpretation that Qwest has is that we need to decide on whether to move forward with this as an exception. According to the process, if the vote is in favor, a schedule for subsequent activities would need to be agreed to. He stated that he thought Terry Wicks had said it much better than he did. Monica Avila/Vartec Stated that Jeff Thompson had mentioned that Qwest felt that the changes could not be implement by the end of 2002. Liz Balvin/WorldCom Indicated that she had heard the same thing and it was included in the answers Qwest had provided to WorldCom's questions. Monica Avila/Vartec Stated that she didn't see that. Liz Balvin/WorldCom Pointed out that it was on page 9 of the CR response. Terry Wicks/Allegiance Asked Liz Balvin if she was opposed to voting as it is stated? If we want to say yes, and we leave the date in there, then the exception either way passes or not. If it passes then Qwest will have to prove how they can't do it. Liz Balvin/WorldCom Stated that this would have to be a unanimous vote. She added that if a vote is taken today to see if we can get it in, it sounds like we are faced with taking a vote to move forward as it stands now. She added that a yes vote would say to implement the CR as it is written. M Buck/Qwest Stated that it's up to WorldCom. Qwest can conduct the vote on the exception as it's written, but if WorldCom chooses to change the language of the exception, Qwest can conduct the vote on that. Donna Osborne-Miller/AT&T Asked that if WorldCom changed the title, then this wouldn't be an exception CR. Terry Wicks/Allegiance Responded by saying that if we follow the process, we have to vote on this, yes or no, to be an exception without altering the date or anything because the notice has gone out. The purpose of this meeting was to gather more information. M Buck/Qwest Indicated that if there was a desire to change the wording a notice could probably go out to the entire community with the updated wording. But, yes, Qwest agrees that there needs to be a vote on whether to allow an exception to the process in this instance. Liz Balvin/WorldCom Asked if the group had agreed that a unanimous vote is required. Donna Osborne-Miller/AT&T Confirmed that we had. Terry Wicks/Allegiance Stated that he also agreed. Liz Balvin/WorldCom Asked if we're saying it's unanimous because it not only changes the timeline but it changes other things too. Donna Osborne-Miller/AT&T Responded that it's because it's called an exception. Liz Balvin/WorldCom Reviewed the language in section 16. She stated that WorldCom thought when writing the CR that the primary impact was changing the timelines set forth with tech specs etc. M Buck/Qwest Replied that on this call, the group seems to have clearly established that this CR, per bullet 3, seeks to change more than timelines. Liz Balvin/WorldCom Asked Michael which sections he was talking about. She indicated that she still thought they were all timeline changes. M Buck/Qwest Indicated that J Thompson/Qwest had already gone through the list in great detail. As just one example, he cited on page 9 the implication of having Major Releases less than 3 months apart. Liz Balvin/WorldCom Stated that she thought the group cleared that up that this is not a major release. M Buck/Qwest Stated that Qwest doesn't share that view. As it was previously discussed, the changes required by this exception meet the definition of a major release as defined in the process. He indicated that the view seemed to be largely shared by others on the call. Liz Balvin/WorldCom indicated that she did understand that this change would be a reallocation of resources. Terry Wicks/Allegiance stated the changes would be functional and require coding by CLECs, that's another reason it qualifies as a major release. Liz Balvin/WorldCom stated that she wanted to be clear that a unanimous vote is required and that a major reason is resources. Everyone on the call agreed that this is a unanimous vote. Terry Wicks/Allegiance clarified that for next week's vote we are voting yes or no on the CR the way it was written. Liz Balvin/WorldCom reviewed the wording in the notice and said that yes the vote would be for the CR the way it was written. WorldCom would not change the wording. M Buck/Qwest asked if there were any other comments/questions and there none. The call ended at 12:25pm

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Date: Aug 27, 2002 EffDate: CMPR.08.27.02.F.01320.CMP_Mtg_Vote Notification Category: CMP Target Audience: CLECs, Reseller Subject: CMP EXCEPTION VOTE REQUIRED Associated CR or System Name and Number: SCR082302-01EX Pursuant to Sections 16.3 and 17.3 of the Qwest Wholesale CMP Process Document <http://www.qwest.com/wholesale/cmp/whaticmp.html>, the purpose of this notification is to alert the CMP community that Qwest has received an Exception Request that will be discussed and voted on at the Sept 19, 2002, Monthly Systems CMP Meeting. At this meeting participants will vote to accept or decline to treat this request as an Exception in accordance with Section 17.0 of the Qwest Wholesale CMP Document, <http://www.qwest.com/wholesale/cmp/whaticmp.html>. Exception Request Details: Requestor: WorldCom Inc. Description of request with good cause for seeking an exception: "Exception: To implement the following CRs SCR060702-01 Migrating Customers using the Conversion As Specified Activity Type and SCR061302-01 Migrate UNE-P Customers by TN prior to IMA 12.0 planned production release of April 3. Description of request with good cause for seeking an exception: Qwest is currently not industry compliant because of its requirements surrounding migrations as specified and the fact that migrate by TN currently is not available. Currently, when migrating as specified, CLECs are obligated to differentiate between features the customer already has and features the customer desires for the first time. They are also forced to include the customer's service address and customer code on every order, and must retrieve new customer codes before submitting supplemental orders. The requirement for additional information places the burden on CLECs to pull, populate and verify information prior to order submission -- all steps that reduce efficient ordering and provides greater room for error. NOTE: Requested migrate as specified capabilities existed prior to IMA release 6.0. Desired outcome: That the migrate as specified and migrate by TN CRs are implemented by Qwest per OBF guidelines no later than the end of 2002. Supporting documentation: 1) "Qwest's Wholesale Change Management Process Document - 7/10/02", section 16.0 states "If the Ex Request is for changes to CMP timelines and sets forth specific dates for completion of tasks, a two-thirds majority vote will be required unless Qwest or a CLEC demonstrate, with substantiating information, that one of the criteria for denial set forth in Sections 5.1.3 or 5.3 is legitimately applicable. If one of the criteria for denial will cause such an exception request to be rejected, the requestor may withdraw the specific dates from its exception request at the meeting where it is discussed, in order to have the two thirds majority vote apply to the request." Thus WCom believes a two-thirds vote would be required to implement the requested changes prior to IMA 12.0 planned production release date of 4/03. (Note: Qwest disagrees with WorldCom's interpretation of the Qwest Wholesale CMP Doc, Section 16. See Decision bullet on page 2, below.) 2) Qwest's Ex Parte dated August 13, 2002 addressing the staff of the Wireline Competition Bureau requests states "The Exception Process, specified in Sect 16 of the CMP, provides the ability for a CLEC or Qwest to request a deviation from the CMP. This process could be used to request expedited treatment or implementation outside of the normal planned release". Thus WCom requests the identified CRs be implemented outside the normal planned IMA release date of 4/03. VOTE: That CRs SCR060702-01 Migrating Customers using the Conversion As Specified Activity Type and SCR061302-01 Migrate UNE-P Customers by TN are implemented by Qwest no later than the end of 2002. A "yes" response would require Qwest to implement by the end of 2002. A "no" vote would require the CRs to follow the processes currently imposed by the Qwest Wholesale Change Management Process Document." Desired outcome: "That the migrate as specified and migrate by TN CRs are implemented by Qwest per OBF guidelines no later than the end of 2002." Supporting documentation: See related CR, SCR082302-01EX, in the CLEC Qwest Change Request - Systems Interactive Reports at <http://www.qwest.com/wholesale/cmp/changerequest.html>. Logistics for Call/Meeting: This request will be discussed and voted on at the Sept 19, 2002, Monthly Systems CMP Meeting. Date: Thursday, Sept 19, 2002 Time: 8:00 - 5:00 MT Location: Inverness Hotel Englewood, Co 877-572-8687, Passcode: 3393947 Vote: Yes: A vote of "Yes" will indicate a preference that development efforts for IMA 12.0 be allocated first to CRs SCR060702-01 and SCR061302-01, in order for Qwest to attempt to meet a December 31, 2002 production date, and then to remaining CRs in accordance with Exception Request SCR081402-01EX. (See Qwest Notification CMPR.08.26.02.F.01319.EmergencyCall_Vote.) No: A vote of "No" will indicate a preference that development efforts for IMA 12.0 be allocated in accordance with Exception Request SCR081402-01EX. (See Qwest Notification CMPR.08.26.02.F.01319.EmergencyCall_Vote.) Decision: Qwest's position is that this request seeks a change to the prescribed manner in which Qwest will apply systems resources, outlined in Sections 5.1.3, 5.2 and 5.2.1 of the Qwest Wholesale Change Management Process Document, <http://www.qwest.com/wholesale/cmp/whaticmp.html>; this vote requires unanimous approval to grant the exception request. Deadline for e-mail votes: All e-mail votes must be received by Qwest, cmpcr@qwest.com, no later than 6:00 AM MT on Thursday, September 19, 2002. (Please refer to Section 17.4.3 of the Qwest Wholesale Change Management Doc <http://www.qwest.com/wholesale/cmp/whaticmp.html>, for e-mail ballot format and procedures.) Change Request Number: SCR082302-01EX Primary contact information: M Buck, Qwest CMP Manager, mjbuck@qwest.com, 303-294-1633 On August 23, 2002, Qwest acknowledged this request by e-mail. Qwest cautions that, if granted, the accelerated nature of the development required to implement this request will impact CLECs and Qwest. This request requires Qwest to attempt to implement an additional Release, including CLEC coding changes, before December 31, 2002. Additionally, if Qwest attempts to implement two CRs on a completely different timeframe than the rest of IMA 12.0 Qwest must divert resources already deployed to IMA 12.0. This resource diversion and intensified re-application will require a Level of Effort greater than that estimated prior to IMA 12.0 Prioritization (which assumed implementation with IMA 12.0 in April 2003) reducing the resources available for the remainder of IMA 12.0.

Original Message

From: "Clauson, Karen L." <klclauson@eschelon.com> Subject: FW: CMP compliance: Change Management: Meeting Agenda & Material: GN: CMP - Exception - Vote Required, Effective Immediately To: "Judith Schultz" <jmschu4@qwest.com> CC: "liz.balvin@wcom.com" <liz.balvin@wcom.com>, "Matt White" <mbwhite@qwest.com>, "Jim Maher" <jaxmaher@qwest.com>, "Bahner, Terry" <tbahner@att.com>, "Crain, Andrew" <acrain@qwest.com>, "Dixon, Tom" <Thomas.F.Dixon@wcom.com>, "Doberneck, Megan" <mdoberne@covad.com>, "Green, Wendy" <wteepe@qwest.com>, "Gunderson, Peder" <peder_gunderson@eli.net>, "Heline, Mark" <mheline@qwest.com>, "Hydock, Mike" <mkydock@att.com>, "Jacobs, Teresa" <tjacobs@qwest.com>, "Jennings-Fader, Mana" <mana.jennings@state.co.us>, "Lees, Marcia" <marcia.lees@sbcc.com>, "Littler, Bill" <blittler@integratelecom.com>, "McDaniel, Paul" <prmcddan@qwest.com>, "Menezes, Mitch" <mmenezes@att.com>, "Nolan, Laurel" <lnolan@qwest.com>, "Osborne-Miller, Donna" <dosborne@att.com>, "Powers, F. Lynne" <flpowers@eschelon.com>, "Prescott, Deborah" <dprescot@usa.capgemini.com>, "Priday, Tom" <tom.priday@wcom.com>, "Quintana, Becky" <becky.quintana@dora.state.co.us>, "Rossi, Matt" <mrossi@qwest.com>, "Routh, Mark" <mrouth@qwest.com>, "Spence, Barbara" <bxspen2@qwest.com>, "Stichter, Kathleen L." <klstichter@eschelon.com>, "Thompson, Jeffery" <jlthomp@qwest.com>, "Travis, Susan" <susan.a.travis@wcom.com>, "VanMeter, Sharon" <svanmeter@att.com>, "Woodcock, Beth" <woode@perkinscoie.com>, "Zulevic, Mike" <mzulevic@covad.com>, "Baum, Carol" <cbaum@usa.capgemini.com>, "Susan Lorence" <sxloren@qwest.com>, "Hines, LeiLani" <Leilani.Jean.Hines@wcom.com>, "Terry Wicks" <terry.wicks@algx.com>, "Benventano, Dan" <dbenvent@usa.capgemini.com>, john_sheehan@frontiercorp.com, "Wayne Hart" <whart@puc.state.id.us>, Clauson, Karen L." <klclauson@eschelon.com>, Johnson, Bonnie J." <bjjohnson@eschelon.com> I have reviewed Section 16 of the CMP document relating to Exceptions, and I do not see any provision in that Section under which Qwest can add its arguments in opposition to the Request in the written notice of the Request. If a CLEC disagrees with an Exception request, a CLEC would have no ability to make its arguments in opposition to the Exception Request in the notice. Sections 16.2 and 16.3 list the contents of the notice and they do not

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include a statement by Qwest when Qwest is not the party asking for the Exception. The notice for the WCOM request, however, adds this language by Qwest: Qwest cautions that, if granted, the accelerated nature of the development required to implement this request will impact CLECs and Qwest. This request requires Qwest to attempt to implement an additional Release, including CLEC coding changes, before Dec 31, 2002. Additionally, if Qwest attempts to implement two CRs on a completely different timeframe than the rest of IMA 12.0 Qwest must divert resources already deployed to IMA 12.0. This resource diversion and intensified re-application will require a Level of Effort greater than that estimated prior to IMA 12.0 Prioritization (which assumed implementation with IMA 12.0 in April 2003), reducing the resources available for the remainder of IMA 12.0. This should be discussed in Redesign.

Original Message From: Elizabeth Balvin <liz.balvin@wcom.com>

Subject: RE: CMP compliance: Change Management: Meeting Agenda & Material: GN: CMP - Exception - Vote Required, Effective Immediately
To: "Clauson, Karen L." <kclauson@eschelon.com>,"Judith Schultz" <jmschu4@qwest.com>CC: "Matt White" <mbwhite@qwest.com>,"Jim Maher" <jxmaher@qwest.com>,"Bahner, Terry" <tbahner@att.com>,"Crain, Andrew" <acrain@qwest.com>,"Dixon, Tom" <Thomas.F.Dixon@wcom.com>,"Doberneck, Megan" <mdoberne@covad.com>,"Green, Wendy" <wteepe@qwest.com>,"Gunderson, Peder" <peder_gunderson@eli.net>,"Heline, Mark" <mheline@qwest.com>,"Hydock, Mike" <mkydock@att.com>,"Jacobs, Teresa" <tjacobs@qwest.com>,"Jennings-Fader, Mana" <mana.jennings@state.co.us>,"Lees, Marcia" <marcia.lees@sbc.com>,"Littler, Bill" <blittler@integratetelecom.com>,"McDaniel, Paul" <prcmdan@qwest.com>,"Menezes, Mitch" <mmenezes@att.com>,"Nolan, Laurel" <lnolan@qwest.com>,"Osborne-Miller, Donna" <dosborne@att.com>,"Powers, F. Lynne" <flpowers@eschelon.com>,"Prescott, Deborah" <dprescot@usa.caggemini.com>,"Priday, Tom" <tom.priday@wcom.com>,"Quintana, Becky" <becky.quintana@dora.state.co.us>,"Rossi, Matt" <mrossi@qwest.com>,"Routh, Mark" <mrouth@qwest.com>,"Spence, Barbara" <bxspen2@qwest.com>,"Stichter, Kathleen L." <klstichter@eschelon.com>,"Thompson, Jeffery" <jlthomp@qwest.com>,"Travis, Susan" <susan.a.travis@wcom.com>,"VanMeter, Sharon" <svanmeter@att.com>,"Woodcock, Beth" <woode@perkinscoie.com>,"Zulevic, Mike" <mzulevic@covad.com>,"Baum, Carol" <cbaum@usa.caggemini.com>,"Susan Lorence" <sxloren@qwest.com>,"Hines, Leilani" <Leilani.Jean.Hines@wcom.com>,"Terry Wicks" <terry.wicks@algx.com>,"Benvenuto, Dan" <dbenvent@usa.caggemini.com>,"John Sheehan" <john_sheehan@frontiercorp.com>,"Wayne Hart" <whart@puc.state.id.us>,"Johnson, Bonnie J." <bjjohnson@eschelon.com>,"Sherry. Lichtenberg (E-mail)" <sherry.lichtenberg@wcom.com>,"Lori Wright (E-mail)" <Lori.Wright@wcom.com> WorldCom opposes Qwest "decision" language in the attached notification as it changes the intent of WCom's Exception change request. In addition, WCom not only agrees with Eschelon assessment of this situation but adds that this notification proves that Qwest believes it can unilaterally impose changes to CMP. As an initial matter, WCom provides the following comments (IN CAPS) surrounding section 16.4.1: 16.4.1Vote on Exception Request

A vote on whether an Exception Request will be handled on an exception basis will take place at the Emergency Call/Meeting, if one is held (See Section 6.2.1). If an Emergency Call/Meeting is not held, the vote will be taken at the Monthly CMP Meeting (See Section 16.4). The standards for determining whether a request should be handled on an exception basis are as follows: If the Exception Request is for a general change to the established CMP timelines without setting forth specific dates, a two-thirds majority vote will be required. THIS WOULD NOT BE THE PROCESS BECAUSE WCOM IS REQUESTING TO CHANGE DEFINED DATES If the Exception Request is for changes to CMP timelines and sets forth specific dates for completion of tasks, a two-thirds majority vote will be required unless Qwest or a CLEC demonstrate, with substantiating information, that one of the criteria for denial set forth in Sections 5.1.3 or 5.3 is legitimately applicable. If one of the criteria for denial will cause such an exception request to be rejected, the requestor may withdraw the specific dates from its exception request at the meeting where it is discussed, in order to have the two thirds majority vote apply to the request
THIS WOULD BE THE PROCESS BECAUSE IF A 2/3 VOTE IS IN FAVOR OF WCOM'S PROPOSAL, QWEST WOULD BE REQUIRED TO IMPLEMENT THE TWO CRS BY YEAR END, WHICH WOULD ALSO CHANGE THE SPECIFIC TIME FRAMES SURROUNDING DOCUMENTATION REQUIREMENTS.

"Issue draft interface technical specifications 120 days in advance"

"Issue final interface technical specifications 100 days in advance"

WHILE THE DOCUMENTATION WOULD ONLY BE FOR TWO CRS AND NOT AN ENTIRE INTERFACE, CLECS WOULD NEED TECHNICAL SPECIFICATIONS IN ADVANCE OF THE CHANGES TO CODE ON OUR SIDE. THESE TIMELINES, AS WELL AS WALK THROUGH REQUIREMENTS WOULD HAVE TO BE ESTABLISHED. If the Exception Request seeks to alter any part of the this CMP other than the established timelines, unanimous agreement will be required.

THIS WOULD NOT BE THE PROCESS BECAUSE WCOM IS SEEKING TO ALTER TECHNICAL SPECIFICATION TIMELINES.

Regarding Qwest "decision" language that states "Qwest position is that this request seeks a change to the prescribed manner in which Qwest will apply systems resources, outlined in Sections 5.1.3, 5.2 and 5.2.1 of the Qwest Wholesale Change Management Process Document..."

WCom provides the following responses surrounding these sections: Section 5.1.32 Implementation of Regulatory CRs" deals with Regulatory CRs for which CRs SCR060702-01 and SCR061302-01 have in no way been categorized by WCom as Regulatory CRs. Section 5.2 "CLEC-Qwest OSS Interface Change Request Lifecycle" states "Based on the Release candidate list/Initial Prioritization List, Qwest will begin its development cycle that includes the following milestones listed below":

The initial prioritization list has been available for Qwest to begin its development cycle since July 26, 2002. Change request SCR060702-01 "Migrate Customers using the Conversion as Specified Activity Type" was prioritized as # 2, thus Qwest should have begun its development cycle on this CR as of July 26th. In addition, per Qwest Ex Parte dated 8/13/02, this requested functionality existed prior to IMA release 6.0, therefore WCom questions the man hours Qwest has imposed for this CR (5675 - 9450 or Extra Large). Regarding CR SCR061302-01 "Migrate UNE-P Customers by TN", since CLECs don't yet have insight into Qwest's development cycle or whether packing options will be available for 12.0, it is too soon to tell whether this CRs has even been touched by Qwest development personnel. In addition, BellSouth implemented a "migrate by TN" CR in a total of 999 man hours. Thus, this also calls into question why Qwest has estimated double the man hours to implement (1875 -3125 or Medium). Section 5.2.1 "Business and Systems Requirements" states "Qwest engineers define the business and functional specifications during this phase. The specifications are completed on a per candidate basis in priority order. During business and system requirements, any candidates which have affinities and may be more efficiently implemented together will be discussed. Candidates with affinities are defined as candidates with similarities in functions or software components. Qwest will also present, at the Monthly CMP Systems Meeting, any complexities, changes in candidate size, or other concerns that may arise during business or system requirements, which would impact the implementation of the candidate."

This language only reiterates the processes as stated above, that Qwest has been directed by the CMP document to define the business and functional specifications in prioritization order. This process should have begun as of July 26th, 2002. WCom believes the following Qwest statement is highly exaggerated:

"Qwest cautions that, if granted, the accelerated nature of the development required to implement this request will impact CLECs and Qwest. This request requires Qwest to attempt to implement an additional Release, including CLEC coding changes, before December 31, 2002. Additionally, if

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Qwest attempts to implement two CRs on a completely different timeframe than the rest of IMA 12.0. Qwest must divert resources already deployed to IMA 12.0. This resource diversion and intensified re-application will require a Level of Effort greater than that estimated prior to IMA 12.0. Prioritization (which assumed implementation with IMA 12.0 in April 2003), reducing the resources available for the remainder of IMA 12.0. For starters, given that Qwest may be required to implement these two CRs by year end, WorldCom is extremely curious why Qwest would determine that a vote could wait until September 19, 2002. In addition, as stated above, the development cycle for "Migrate Customers using the Conversion as Specified Activity Type" should not only be well on its way but should be minimal given Qwest's assertion to the FCC that the functionality existed prior to IMA release 6.0. Then there's the "migrate by TN" CR. WCom would like addressed the question surrounding the man hours to implement, given that BellSouth implemented "migrate by TN" functionality in half the man hours. As well, CLECs have no insight into Qwest development cycle and/or "affinities" processes to know whether this CR has been touched by Qwest development personnel. That said, it is possible that development has occurred and/or affinities have been identified. On a final note, Qwest's Ex Parte dated 8/13/02 specifically states "The Exception Process, specified in Section 16 of the CMP, provides the ability for a CLEC or Qwest to request a deviation from the CMP. This process could be used to request expedited treatment or implementation outside of the normal planned release." WCom is attempting to utilize the Exception Process as Qwest defined it for the FCC. That the two CRs in question be implemented "outside of the normal planned release". Now that this request has been initiated, Qwest seeks to change the manner in which the process is defined.

Thanks, Liz Balvin WorldCom Carrier Management - Qwest Internal Line - V625-7305 External Line - 303-217-7305 Pager (888) 900-7221

Date: Aug 30, 2002 Eff Date: Immediately CMPR.08.30.02.F.01322.Ad_Hoc_CMP_Mtg Notification Category: Change Management Notification Target Audience: CLECs, Resellers Subject: CMP Request for Ad Hoc CMP Meeting Important Exception Discussion No Vote Required This notice is to inform all CLECs that WorldCom has requested an additional CMP meeting before the next regularly scheduled monthly CMP meeting. On August 27, 2002, Qwest sent notice CMPR.08.27.02.F.01320.CMP_Meeting_Vote because of a CMP Exception

Request (SCR082302-01EX) submitted by WorldCom. WorldCom has subsequently requested an additional CMP meeting to discuss the exception as described below. Additional Meeting Details: Requestor: WorldCom Agenda: Begin verbatim excerpt of request received from WorldCom: WCom requests that an ad hoc meeting (per section 3) be established as soon as possible to address at a minimum the following issues: 1. More details provided by Qwest to better understand if this change request is approved, what would be the end result impact? What in addition to timeline changes (disclosure documentation requirements) does Qwest believe will apply? What is the progress to date surrounding these CRs... "migrate as specified" business development requirements should have begun as of July 26, 2002. Did Qwest account for the fact that migrate as specified functionality existed prior to IMA 6.0 when estimating its man hours? Has there been any analysis performed on "migrate by TN" (synergies?). Are the man hours established for "migrate by TN" still considered appropriate? How would Qwest resources be diverted How would the 12.0 prioritization list be impacted What additional man hours would be estimated 1. What "voting" standard must apply (2/3rds or unanimous)

Is it possible to treat the CRs separately given their 12.0 ranking status? Example: "migrate as specified" will be implemented in April/03, would only "timeline" changes apply?, thus 2/3rds vote 1. What other options are available to address the Exception CR and lessen the impact on the 12.0 release?

End verbatim excerpt of request received from WorldCom Supporting Documentation: Related Exception Request SCR082302-01EX (Exception Request to Implement Multiple CRs Prior to IMA 12.0) available in the CLEC Qwest Change Request Systems Interactive Reports at <http://www.qwest.com/wholesale/cmp/changerequest.html> Related Change Requests SCR060702-01 (Migrating Customers Using the Conversion As Specified Activity Type) and SCR061302-01 (Migrate UNE-P Customers By TN) available in the CLEC Qwest Change Request Systems Interactive Reports at <http://www.qwest.com/wholesale/cmp/changerequest.html> Notice CMPR.08.27.02.F.01320.CMP_Meeting_Vote available in the Qwest Customer Notice Letters Archive (CNLA) at <http://www.qwest.com/wholesale/notices/cnla/> Logistics for Call/Meeting: Date: Monday, Sept 9, 2002 Time: 1:30 PM 3:00 PM MT Contact information: MI Buck, Qwest CMP Manager, mjbuck@qwest.com, 303-294-1633

Announcement September 4, 2002 Effective Date: Immediately CMPR.09.04.02.F.01323.Ad_Hoc_Mtg_Revision Notification Category: Change Management Notification Target Audience: CLECs, Resellers Subject: CMP Request for Ad Hoc CMP Meeting Important Exception Discussion No Vote Required MEETING DATE CHANGE This notice is to inform CLECs that Qwest has received a request to reschedule the Ad Hoc CMP Meeting described in notice CMPR.08.30.02.F.01322.Ad_Hoc_CMP_Mtg. As a result of this request, the logistics for the Ad Hoc meeting originally scheduled for September 9, 2002 have been revised as follows: Date: Wednesday, September 11, 2002 Time: 11:00 AM MT 12:30 PM MT Call in Details: 877-572-8687, The remainder of this notice contains meeting details as originally described in notice CMPR.08.30.02.F.01322.Ad_Hoc_CMP_Mtg. This notice is to inform all CLECs that WorldCom has requested an additional CMP meeting before the next regularly scheduled monthly CMP meeting. On August 27, 2002, Qwest sent notice CMPR.08.27.02.F.01320.CMP_Meeting_Vote because of a CMP Exception Request (SCR082302-01EX) submitted by WorldCom. WorldCom has subsequently requested an additional CMP meeting to discuss the exception as described below. Additional Meeting Details: Requestor: WorldCom Agenda: Begin verbatim excerpt of request received from WorldCom: WCom requests that an ad hoc meeting (per section 3) be established as soon as possible to address at a minimum the following issues: 1. More details provided by Qwest to better understand if this change request is approved, what would be the end result impact?

What in addition to timeline changes (disclosure documentation requirements) does Qwest believe will apply? What is the progress to date surrounding these CRs... "Migrate as specified" business development requirements should have begun as of July 26, 2002. Did Qwest account for the fact that migrate as specified functionality existed prior to IMA 6.0 when estimating its man hours? Has there been any analysis performed on "migrate by TN" (synergies?). Are the man hours established for "migrate by TN" still considered appropriate? How would Qwest resources be diverted How would the 12.0 prioritization list be impacted What additional man hours would be estimated 1. What "voting" standard must apply (2/3rds or unanimous) Is it possible to treat the CRs separately given their 12.0 ranking status? Example: "migrate as specified" will be implemented in April/03, would only "timeline" changes apply?, thus 2/3rds vote 1. What other options are available to address the Exception CR and lessen the impact on the 12.0 release? End verbatim excerpt of request received from WorldCom Supporting Documentation: Related Exception Request SCR082302-01EX (Exception Request to Implement Multiple CRs Prior to IMA 12.0) available in the CLEC Qwest Change Request Systems Interactive Reports at <http://www.qwest.com/wholesale/cmp/changerequest.html> Related Change Requests SCR060702-01 (Migrating Customers Using the Conversion As Specified Activity Type) and SCR061302-01 (Migrate UNE-P Customers By TN) available in the CLEC Qwest Change Request Systems Interactive Reports at <http://www.qwest.com/wholesale/cmp/changerequest.html> Notice CMPR.08.27.02.F.01320.CMP_Meeting_Vote available in the Qwest Customer Notice Letters Archive (CNLA) at <http://www.qwest.com/wholesale/notices/cnla/> Logistics for Call/Meeting: Date: Wednesday, September 11, 2002 Time: 11:00 AM MT 12:30 PM MT Conference Bridge Information: 877-572-8687, Passcode: 3393947# Primary Contact information: Michael Buck, Qwest CMP Manager,

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mjbuck@qwest.com, 303-294-1633.

ANALYSIS AS REQUESTED BY WORLDCOM

WorldCom has requested that the schedule for two CRs that are currently prioritized in the IMA 12.0 Release Candidate List be accelerated, and that those two CRs be delivered before the end of 2002. The two CRs are: SCR060702-01 Migrating Customers using the Conversion As Specified Activity Type. This candidate was prioritized number two on the IMA 12.0 candidate list. SCR061302-01 Migrate UNE-P Customers by TN. This candidate was prioritized number nineteen on the IMA 12.0 candidate list. In response to WorldCom's request to accelerate these CRs, Qwest provides the following analysis as to the implications of fulfilling the request.

The first notable point is that both candidates are CLEC impacting candidates that by their implementation require that the functions associated with an IMA major release (technical specifications, CLEC interface testing, production migrations, etc.) be performed. Failing to perform these functions would render the candidates unusable by EDI CLECs. Having determined the need to treat these candidates as major release candidates, it should be noted that the IMA 11.0 Release lifecycle is currently in test and hence it is too late to attempt to implement these candidates as part of the 11.0 release. With the schedule for IMA 11.0 release in November, it is not possible to complete the development effort for these two candidates and deliver them in December. The best possible schedule Qwest could achieve for the delivery of these two candidates is to convert the 11.1 point release scheduled for January 2003 to a special major release, include these candidates along with the current 11.1 candidates and deliver them in January 2003. Following this schedule will require the delivery of a SATE special release and the IMA special major release simultaneously, violating the SATE 30-day test window required by CMP and likely impacting the schedule on which PO-19 could be executed. Alternatively, if the SATE 30-day test window is a requirement, the SATE special release could be delivered in January 2003 with the IMA special major release delivered in February 2003. Since this would only result in a schedule acceleration of 60 days, we will assume that WorldCom would prefer to see the candidates delivered in January 2003 and will use that date in further discussions. Much of the discussion does not change regardless of whether the date is January 2003 or February 2003.

Approval of this exception CR will create a major IMA release with only one quarter's notice prior to implementation. Because of this aggressive schedule, EDI CLECs will have to work similarly aggressive development schedules on their side of the EDI interface in order to take advantage of these candidates prior to the IMA 12.0 release. Acceleration of candidates of this nature has implications that arise simply from the requirements of the development process itself. The first of these is the risk associated with the delivery of the release. By accelerating these candidates, you drastically reduce the development lifecycle timeline and thereby increase the likelihood of an issue arising from which the IMA timeline cannot recover, and potentially causing Qwest to fail to deliver the release on the accelerated schedule. The risk associated with the development schedule pertains not only to the software itself, but also to the accompanying deliverables such as documentation. Working under this accelerated schedule, Qwest will not be able to make the CMP required technical specifications delivery schedule (section 8.1 of the CMP document) or the documentation schedule. While a detailed schedule for these deliverables has not been completed, a high level assessment of the situation would indicate that Qwest would miss these dates by at least 30 days in some cases (draft interface technical specifications). The same implications exist for the training schedule. The addition of these products will require revision of the training classes very close behind the revisions required for IMA 11.0. This will cause overlap in the both the training development and delivery schedule that will have to be managed. The second development issue pertains to the shifting of resources from the IMA 12.0 Release to this special major release. Creating this special major release will require the resources currently devoted to IMA 11.1 as well as the diversion of IMA 12.0 resources to this special major release. Because of the additional resources required on an accelerated development schedule, using the high end range of the LOEs for these candidates, Qwest would need to divert approximately 13,000 hours of effort from the IMA 12.0 to apply to this special major release. This would result in the application of 27,000 hours to the IMA 12.0 Release. Based on the application of 40,000 hours to the IMA 12.0 candidate list, Qwest is most likely to be able to complete the top 19 candidates. With the application of 27,000 hours to the IMA 12.0 Release, Qwest is most likely to be able to complete 16 candidates resulting in not only moving these two candidates out of the release, but also losing one additional candidate. While there have not been any packaging or commitment decisions made for IMA 12.0, it is likely that either SCR062702-03 Autopopulate LSO (Local Serving Office) field in IMA and remove edit that prevents APTCON (appointment confirmation) and LSO field to both be populated or SCR062702-10 Create a field in IMA that can be checked to flag this LSR is to place a change order on an account where the CSR is not updated from the conversion activity would need to be dropped from the release. Additionally, there are several CMP issues that are created by using the above schedule for the special major release. The first is the requirement that The Major release changes should occur no less than three (3) months apart as specified in section 8.0, Changes to Existing OSS Interfaces, of the CMP document. Whether the release is delivered in January or February of 2003, this CMP requirement will be violated with the IMA 11.0 and 12.0 dates remaining where they are at today. Having major releases this close together will impact the sunset dates for the major releases under discussion. Section 8.0 of the CMP document specifies that Qwest will support the previous major Interconnect Mediated Access (IMA) EDI release for six (6) months after the subsequent major IMA EDI release has been implemented. Qwest supports 3 production hardware platforms, which, when releases are at least 3 months apart, is sufficient to meet the requirements of CMP. However, under the schedule discussed above, using these three hardware platforms would require the early retirement of both the IMA 10.0 and 11.0 releases. IMA 10.0 will be retired in April 2003 instead of May 2003. Qwest has already received inquiries about extending the sunset date for IMA 10.0 beyond May. These inquiries would have to be denied with the approval of this exception CR. Additionally, the IMA 11.0 retirement date would be moved from October 2003 to July 2003. Another CMP concern involves the requirement to prioritize what candidates will be scheduled for a major release of IMA (section 10 of the CMP document). As described above, the delivery of these candidates requires the implementation of a major release. Invoking this exception process to move the number 2 and 19 candidates from the IMA 12.0 prioritization list into a major release of their own without providing the opportunity required under CMP to prioritize the contents of the new release. Approval of this exception will overrule the outcome of the previous WorldCom exception, which was unanimously approved by the CLECs and Qwest. It should be noted that CMP Redesign Team developed a specific process (SCRIP) for the situation in which a candidate or candidates is not prioritized high enough to be slotted into a release that would meet a CLECs desired timeframe. An alternative mechanism for requesting the acceleration of these candidates may be the SCRIP process which would involve the application of additional, CLEC funded, resources and would not be as disruptive to the development efforts currently underway. Finally, one additional question has come up that was not answered as part of the above analysis and are included here for completeness. Question: What is the progress to date surrounding these CRs migrate as specified business development requirements should have begun as of July 26, 2002. Did Qwest account for the fact that migrate as specified functionality existed prior to IMA 6.0 when estimating its man-hours? Has there been any analysis performed on migrate by TN (synergies?). Are the man-hours established for migrate by TN still considered appropriate? Response: The CR Migrating Customers using the Conversion As Specified Activity Type is in the Business Requirements phase and is scheduled to complete this phase by mid September. The functionality existing prior to the IMA 6.0 release helps only in understanding some of the complexities of this deliverable. The system changes in each release and the requirements have to be written to support or build upon the current release level. The staff-hours are still valid at the point. The re-evaluation of the LOEs will be done just prior to packaging and any changes in the LOEs will be made available to CMP. The CRMigrate UNE-P Customers by TN is just beginning its definition phase. Qwest defines the CRs based on their CMP prioritized ranking. As with all CRs we

Open System Change Requests -- Detail

look for synergies during the definition phase. A full synergy evaluation would be complete by end of September when the CR is targeted to complete the Business Requirements phase. The staff-hours are still valid at this point. As with the previous CR, the reevaluation of the LOEs will be done just prior to packaging any changes in LOEs will be made available to CMP.

=====
Date: Sept 10, 2002 Eff Date: Immediately: CMPR.09.10.02.F.01324.Ad_Hoc_Mtg

QWEST - INTERNAL NOTIFICATION

Announcement Date:
Effective Date:

September 24, 2002
Immediately

Notification Number:
Notification Category:
Target Audience:

I.CMPR.09.24.02.F.01328.CMP_ExceptionCR_Vote
Change Management Notification
CLECs, Resellers

Subject:

CMP – Emergency Call/Meeting Vote Disposition

Associated CR # or System Name and Number:
TO:

SCR082302-01EX
 Sales Teams, Service Managers, Product Managers,
 Process Managers and other organizations with a need
 to know

This notice regarding the voting results of SCR082302-01EX will be released to wholesale customers on September 24, 2002.

Pursuant to Sections 16.5 and 17.4.4 of the Qwest Wholesale Change Management Process Document, <http://www.qwest.com/wholesale/cmp/whatiscmp.html>, this notification announces the disposition of Exception Change Request SCR082302-01EX and the results of the vote taken during the September 19, 2002, Exception Request Meeting.

In this vote, conducted in accordance with Sections 16.4 and 17.0, the participants voted not to treat SCR082302-01EX as an Exception by a vote of 6 “No” votes, 6 “Yes” votes, and 3 “Abstain” votes. Please see the attached tally form and meeting minutes for specific voting results.

Sincerely,

Qwest

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.

EXHIBIT 5-1

**Excerpts of Interconnection Agreements with
AT&T From Colorado, Iowa and Washington**

**AT&T Communications of the Mountain
States, Inc.**

and

U S WEST Communications, Inc.

INTERCONNECTION AGREEMENT

3.2.1.2 any known unbilled non-usage sensitive charges for prior periods;

3.2.1.3 unbilled usage sensitive charges for the period beginning with the last bill date and extending up to, but not including, the current bill date;

3.2.1.4 any known unbilled usage sensitive charges for prior periods; and

3.2.1.5 any known unbilled adjustments.

3.2.2 At the same time as the monthly bill is transmitted, USWC shall send a separate file summarizing all of AT&T usage sensitive messages which are contained in USWC's suspense files and unbilled files.

3.2.3 The Bill Date must be present on each bill transmitted by USWC to AT&T, must be a valid calendar date, and not more than ninety (90) days old. As used herein, the Bill Date shall mean the date on which the bill was prepared.

3.2.4 On each bill where 'Jurisdiction' is identified, local and local toll charges shall be identified as 'Local' and not as interstate, interstate/interLATA, intrastate, or intrastate/intraLATA. USWC shall provide from and through dates for charges rendered on all Connectivity Bills.

3.2.5 USWC shall separately identify business charges from residence charges, as appropriate, and shall assign a specific adjustment or reference number provided by AT&T to each adjustment and credit included on the Connectivity Bill.

3.2.6 USWC and AT&T shall issue all Connectivity Bills in accordance with the terms and conditions set forth in this Section 3. On Connectivity Bills USWC renders to AT&T, BANs shall be thirteen (13) character alpha/numeric and there shall only be one (1) BAN per State. The Bill Date shall be the same day month to month. Each Party shall provide the other Party at least thirty (30) calendar days' written notice prior to changing, adding or deleting a BAN. The Parties shall provide one (1) Connectivity Billing invoice associated with each BAN. Each invoice must contain an invoice number (which will vary from month to month). On each bill associated with a BAN, the appropriate invoice number and the charges contained on such invoice must be reflected. All Connectivity Bills must be received by the other Party no later than ten (10) calendar days from the Bill Date and at least thirty (30) calendar days prior to the payment due date (as described in this Attachment), whichever is earlier. Any Connectivity Bill received on a Saturday, Sunday or a day designated as a bank holiday will be deemed received the next business day. If either Party fails to receive Connectivity Billing data and information within the time period specified above, then the payment due date will be extended by the number of days receipt has been delayed.

3.2.7 USWC shall issue all Connectivity Bills containing such billing data and information in accordance with industry national standards. To the extent that there are no standards governing the formatting of certain data, such data shall be issued in the format mutually agreed to by USWC and AT&T.

3.2.9 USWC and AT&T agree that each Party shall transmit Connectivity Billing information and data in the appropriate format electronically via NDM to the other Party at

**AGREEMENT
FOR LOCAL WIRELINE NETWORK INTERCONNECTION
AND
SERVICE RESALE**

date, (4) any known unbilled usage sensitive charges for prior periods, and (5) any known unbilled adjustments.

- 2.3 The Bill Date, as defined herein, must be present on each bill transmitted by the ILEC to the CLEC. Connectivity Bills shall not be rendered for any Connectivity Charges which are incurred under this Agreement on or before one (1) year preceding the Bill Date. In addition, on each bill where "Jurisdiction" is identified, local and local toll charges shall be identified as "Local" and not as interstate, interstate/ interLATA, intrastate, or intrastate/intraLATA.
- 2.4 The ILEC shall bill the CLEC for each Element, or Local Service, supplied by the ILEC to the CLEC pursuant to this Agreement at the rates set forth in this Agreement. The ILEC will bill the CLEC based on the actual Connectivity Charges incurred, provided, however, for those usage based Connectivity Charges where actual charge information is not determinable by the ILEC because the jurisdiction (i.e., interstate, interstate/interLATA, intrastate, intrastate/intraLATA, local) of the traffic is unidentifiable, the parties will jointly develop a process to determine the appropriate charges. Measurement of usage-based Connectivity Charges shall be in actual conversation seconds. The total conversation seconds per chargeable traffic types shall be billed per applicable tariffs.
- 2.5 Except as otherwise specified in this Agreement, each party shall be responsible for (1) all costs and expenses it incurs in complying with its obligations under this Agreement and (2) the development, modification, technical installation and maintenance of any systems or other infrastructure which it requires to comply with and to continue complying with its responsibilities and obligations under this Agreement.
- 2.6 Each party shall provide the other party at no additional charge a contact person for the handling of any Connectivity Billing questions or problems that may arise during the implementation and performance of the terms and conditions of this Attachment.

3. **Meet Point Billing**

- 3.1 The CLEC and the ILEC will establish meet-point billing ("MPB") arrangements in accordance with the Meet Point Billing guidelines adopted by and contained in the OBF's MECAB and MECOD documents, except as modified herein. Both parties will use their best reasonable efforts, individually and collectively, to maintain provisions in their respective federal and state access tariffs, and/or provisions within the National Exchange Carrier Association ("NECA") Tariff No. 4, or any successor tariff to reflect the MPB arrangements identified in this Agreement, in MECAB and in MECOD.

**AGREEMENT
FOR LOCAL WIRELINE NETWORK INTERCONNECTION
AND
SERVICE RESALE
Between
AT&T Communications of the Pacific Northwest, Inc.
and
U S WEST Communications, Inc.**

-- FILED JULY 25, 1997 --

[NOTE: In this Agreement, plain language corresponds to language agreed to by the Parties and **bold language** corresponds to language included to comply with the Commission's Order. In the footnotes, "Order" refers to the Arbitrator's Report and Decision issued November 27, 1996, "Recommendations" refers to the Arbitrator's Report and Recommendations issued June 6, 1997, and "Approval" refers to the Commission Order Modifying Arbitrator's Decision and Arbitrator's Recommendations and Approving Interconnection Agreement with Modifications issued July 11, 1997.]

erroneous data shall be considered lost. If MPB data is lost due to uncorrectable errors or otherwise, the Parties shall follow the procedures set forth in Section 5 of this Attachment 5 and compensate the other for the lost MPB billing data.

- 4.1.23.11 In the event AT&T purchases from U S WEST Network Elements, or Combination thereof, in a LATA other than the LATA to or from which the MPB services are homed and in which U S WEST operates an access tandem, U S WEST shall, except in instances of capacity limitations, permit and enable AT&T to sub-tend the U S WEST access tandem switch(es) nearest to the AT&T rating point(s) associated with the NPA-NXX(s) to/from which the MPB services are homed. In such event, AT&T shall be responsible for the transport facilities crossing LATA boundaries. In instances of capacity limitation at a given access tandem switch, AT&T shall be allowed to subtend to the next nearest U S WEST access tandem switch in which sufficient capacity is available. The MPB percentages for each new rating point/access tandem pair shall be calculated in accordance with MECAB and MECOD.

4.2 Information Exchange and Interfaces

- 4.2.1 U S WEST shall provide AT&T a monthly Connectivity Bill that includes all Connectivity Charges incurred by and credits and/or adjustments due to AT&T for those services ordered, established, utilized, discontinued or performed pursuant to this Agreement. For each account, U S WEST shall issue one (1) bill per month and the billing cycle shall be on a calendar basis. Each Connectivity Bill provided by U S WEST to AT&T shall include:
- 4.2.1.1 all non-usage sensitive charges incurred for the current bill period.
 - 4.2.1.2 any known unbilled non-usage sensitive charges for prior periods;
 - 4.2.1.3 usage sensitive charges for the current relevant bill period (from the last bill date and extending up to, and including, the current bill date);
 - 4.2.1.4 any known unbilled usage sensitive charges for prior periods; and
 - 4.2.1.5 any known unbilled adjustments.
- 4.2.3 The bill date must be present on each bill transmitted by U S WEST to AT&T, must be a valid calendar date, and not more than ninety (90) days old. Connectivity Bills shall not be rendered for any Connectivity Charges which are incurred under this Agreement on or before two hundred and seventy (270) days preceding the bill date, except as otherwise permitted by law.
- 4.2.4 On each bill where "Jurisdiction" is identified, local and local toll charges shall be identified as "Local" and not as interstate, interstate/interLATA, intrastate, or intrastate/intraLATA. U S WEST shall provide from and through dates for charges rendered on all Connectivity Bills.
- 4.2.5 U S WEST shall separately identify business charges from residence charges, as appropriate, and shall assign a specific adjustment or reference number provided by AT&T to each adjustment and credit included on the Connectivity Bill.
- 4.2.6 U S WEST and AT&T shall issue all Connectivity Bills in accordance with the terms and conditions set forth in this Section 4. On Connectivity Bills U S WEST renders to AT&T,

EXHIBIT 5-2

Draft PID BI-5

Attachment 4

Draft PID BI-5

BI-5 Billing Claims Processing 01 Aug 02 Draftv2

Purpose:

Evaluates the promptness with which Qwest acknowledges and resolves CLEC billing adjustment claims processed in the Service Delivery Center.

Description:

Measures the percentage of billing adjustment claims for Resale, UNE (RSID, ZCID) billed accounts and LIS interconnection usage and local facility accounts acknowledged and resolved within specified timeframes.

BI-5A – Measures the number of billing adjustment claims acknowledged during the month that are acknowledged within two business days after receipt, as a percentage of the total number of billing adjustment claims acknowledged during the month.

- Time interval for acknowledging claims is measured from the date of receipt to date of acknowledgement.
- Date of receipt is the date Qwest receives the claim, subject to business hours defined below.

BI-5B – Measures the number of billing adjustment claims resolved during the month that are resolved within 28 calendar days after acknowledgement, as a percentage of total number of billing adjustment claims resolved during the month.

- Time interval for resolving claims is measured from date of acknowledgement to date of resolution.
- Date of resolution is the date on which Qwest sends an e-mail, facsimile, or mailed response to the e-mail address, facsimile number, or mailing address designated by the CLEC. As a minimum, this communication of resolution either 1) denies the claim and provides a reason; or 2) grants the claim and informs the CLEC that a credit will be provided whether or not the communication provides the specific amount of the credit to be issued; or 3) denies the claim in part and grants the claim in part.
- If the 28th calendar day falls on a weekend or Qwest Legal Holiday, resolution will be considered timely if returned on the next business day.
- Date of acknowledgement is the date on which Qwest sends the claim number (if provided) via an e-mail, facsimile, or mailed response to the e-mail address, facsimile number, or mailing address designated by the CLEC, thus acknowledging the claim, or, if the claim cannot be processed, a message so informing the CLEC, to the e-mail address, facsimile number, or mailing address designated by the CLEC.
- This measurement includes only CLEC claims that are submitted within 60 calendar days of the bill date subject to the business rules listed in this description and exclusions listed below.
- Business days/hours for receipt of billing claims are Monday through Friday, 8:00 AM to 5:00 PM, excluding Qwest Legal Holidays.
 - CLEC claims for billing errors received outside these business hours shall be considered received at 8:00 am on the first business day thereafter.
- To qualify for inclusion in this measurement, claims must be submitted by e-mail to the CLECs assigned Service Delivery Coordinator or by another format jointly agreed upon between Qwest and the CLEC. All requested information must be provided, whichever format is used.
- Claims that are the subject of this measurement are those with the following reason codes: USG (disputed usage from an Interexchange Carrier on the Qwest bill), TOLL (Itemized calls or pay per use charges on a Qwest bill), DA (directory advertising), LIST (incorrect billing for listings), LPC (late payment charges), NRC (non-recurring charges), NRES (non-resellable products/services), RATES (customer claim that rates on the bill are incorrect), RC (recurring charges), RSD (resale discount), or TAX (taxes incorrectly billed to account).
- Qwest will consider a returned claim as no further action required on our part, and when additional information needed is provided acknowledge the claim as a new claim and work on resolving the claim.
-
- Each reason code will count as a separate claim.

Reporting Period: One month

Unit of Measure: Percent

BI-5 Billing Claims Processing 01 Aug 02 Draftv2 (continued)

<p>Reporting Comparisons: CLEC aggregate, individual CLEC</p>	<p>Disaggregation Reporting: Region-wide level.</p>
<p>Formula: BI-5A = [(Number of billing adjustment claims acknowledged during the month that are acknowledged within two business days after receipt) + (Total number of billing adjustment claims acknowledged during the month)] x 100 BI-5B = [(Number of billing adjustment claims resolved during the month that are resolved within 28 calendar days after acknowledgement) + (Total number of billing adjustment claims resolved during the month)] x 100</p>	
<p>Exclusions:</p> <ul style="list-style-type: none"> • CLEC claims for incentive regulation credits, credits for performance remedies, out of service, and special promotional credits. • CLEC claims that involve service order inquiries or account structure, or that are matters of contract or tariff interpretation. Service order inquiries include, but are not limited to; those on the attached form that request PON numbers. Account structure inquiries include, but are not limited to, those for independent bills, summary bill transfers, and unknown lines. • CLEC claims related to bill media or technical issues. • CLEC claims that are in fact for items enumerated above as excluded, but are referred to with different terminology. 	
<p>Product Reporting: None</p>	<p>Standard: BI-5A: 95% within two business days after receipt. BI-5B: 95% within 28 calendar days (after acknowledgement.)</p>
<p>Availability:</p> <p>Under Development:</p> <ul style="list-style-type: none"> • Beginning with Jun 02 data on the Aug 02 report 	<p>Notes:</p>

Qwest Montana

Comparison of Residential Revenue to UNE-P Costs (with Federal USF)

UNE-P Cost

	Zone 1	Zone 2	Zone 3	Zone 4	
Port	\$ 1.58	\$ 1.58	\$ 1.58	\$ 1.58	Zone 1
Loop	\$ 23.10	\$ 23.90	\$ 27.13	\$ 29.29	Zone 2
Local switching	\$ 7.22	\$ 7.22	\$ 7.22	\$ 7.22	Zone 3
Shared Transport	\$ 1.08	\$ 1.08	\$ 1.08	\$ 1.08	Zone 4
					% of Residence Lines
					75%
					11%
					10%
					4%
Non-recurring	\$ 32.98	\$ 33.78	\$ 37.01	\$ 39.17	
	\$ 0.02	\$ 0.02	\$ 0.02	\$ 0.02	
	\$ 33.00	\$ 33.80	\$ 37.03	\$ 39.19	

	Estimated Revenue	Cost	Avg. Resale Revenue
Basic and EAS	\$ 19.17	\$ 15.70	\$ 20.81
SLC	\$ 5.33	\$ 5.33	\$ 5.33
Line Revenue	\$ 24.50	\$ 21.03	\$ 26.14
Federal USF	\$ 1.94	\$ -	\$ -
Features	\$ 4.10	\$ 3.36	\$ 4.10
Inter/Intra LATA Access	\$ 4.03	\$ -	\$ -
IntraLATA Toll	\$ 1.28	\$ 1.05	\$ 1.28
Total Additional (Access, Toll)	\$ 9.41	\$ 4.41	\$ 5.38

	Case A				Case B				Case C			
	Zone 1	Zone 2	Zone 3	Zone 4	Zone 1	Zone 2	Zone 3	Zone 4	Zone 1	Zone 2	Zone 3	Zone 4
Local line	\$ 24.50	\$ 25.25	\$ 28.25	\$ 30.25	\$ 24.50	\$ 25.25	\$ 28.25	\$ 30.25	\$ 24.50	\$ 25.25	\$ 28.25	\$ 30.25
Add'l Revs & Federal USF	\$ 1.94	\$ 1.94	\$ 1.94	\$ 1.94	\$ 6.65	\$ 6.65	\$ 6.65	\$ 6.65	\$ 6.65	\$ 6.65	\$ 6.65	\$ 6.65
UNE-P Cost	\$ 33.00	\$ 33.80	\$ 37.03	\$ 39.19	\$ 33.00	\$ 33.80	\$ 37.03	\$ 39.19	\$ 33.00	\$ 33.80	\$ 37.03	\$ 39.17
Gross margin	\$ (6.56)	\$ (6.61)	\$ (6.84)	\$ (7.00)	\$ (1.86)	\$ (1.91)	\$ (2.14)	\$ (2.30)	\$ (1.86)	\$ (1.91)	\$ (2.14)	\$ (2.30)
Margin as % of cost	-20%	-20%	-18%	-18%	-6%	-6%	-6%	-6%	-6%	-6%	-6%	-6%

	Case D				Case E			
	Zone 1	Zone 2	Zone 3	Zone 4	Zone 1	Zone 2	Zone 3	Zone 4
Local line	\$ 24.50	\$ 25.25	\$ 28.25	\$ 30.25	\$ 24.50	\$ 25.25	\$ 28.25	\$ 30.25
Add'l Revs & Federal USF	\$ 11.35	\$ 11.35	\$ 11.35	\$ 11.35	\$ 16.06	\$ 16.06	\$ 16.06	\$ 16.06
UNE-P Cost	\$ 33.00	\$ 33.80	\$ 37.03	\$ 39.19	\$ 33.00	\$ 33.80	\$ 37.03	\$ 39.17
Gross margin	\$ 2.85	\$ 2.80	\$ 2.57	\$ 2.41	\$ 7.56	\$ 7.51	\$ 7.28	\$ 7.14
Margin as % of cost	9%	8%	7%	6%	23%	22%	20%	18%

**Qwest Montana
Comparison of Residential Custom Choice Revenue to UNE-P Costs**

UNE-P Cost

	Zone 1	Zone 2	Zone 3	Zone 4		Resale	Avg. Resale
					Cost	Revenue	
Port	\$ 1.58	\$ 1.58	\$ 1.58	\$ 1.58	\$	\$ 15.70	\$ 20.81
Loop	\$ 23.10	\$ 23.90	\$ 27.13	\$ 29.29	\$	\$ 5.33	\$ 5.33
Local switching	\$ 7.22	\$ 7.22	\$ 7.22	\$ 7.22	\$	\$ 21.03	\$ 26.14
Shared Transport	\$ 1.08	\$ 1.08	\$ 1.08	\$ 1.08	\$	\$ -	\$ -
Non-recurring	\$ 32.98	\$ 33.78	\$ 37.01	\$ 39.17	\$	\$ 13.28	\$ 16.22
	\$ 0.02	\$ 0.02	\$ 0.02	\$ 0.02	\$	\$ -	\$ -
	\$ 33.00	\$ 33.80	\$ 37.03	\$ 39.19	\$	\$ 1.05	\$ 1.28
					\$	\$ 1.05	\$ 1.28

	Zone 1	Zone 2	Zone 3	Zone 4	Resale
Basic and EAS	\$ 19.17	\$	\$	\$	\$ 20.81
SLC	\$ 5.33	\$	\$	\$	\$ 5.33
Line Revenue	\$ 24.50	\$	\$	\$	\$ 26.14
Federal USF	\$ 1.94	\$	\$	\$	\$ -
Custom Choice	\$ 16.22	\$	\$	\$	\$ 16.22
Inter/Intra LATA Access	\$ 4.03	\$	\$	\$	\$ -
IntraLATA Toll	\$ 1.28	\$	\$	\$	\$ 1.28
Total Additional (Access, Toll)	\$ 5.31	\$	\$	\$	\$ 1.28

% of Residential Customers

	Zone 1	Zone 2	Zone 3	Zone 4	Resale
Local line	\$ 24.50	\$ 25.25	\$ 28.25	\$ 30.25	\$ 26.14
Add'l Revs & Federal USF	\$ 23.47	\$ 23.47	\$ 23.47	\$ 23.47	\$ 17.50
UNE-P Cost	\$ 33.00	\$ 33.80	\$ 37.03	\$ 39.19	\$ 35.36
Gross margin	\$ 14.97	\$ 14.92	\$ 14.69	\$ 14.53	\$ 8.28
Margin as % of cost	45%	44%	40%	37%	23%



Announcement Date:	September 24, 2002
Effective Date:	September 25, 2002
Document Number:	PROS.09.24.02.F.00585.Density_Zone_1
Notification Category:	Process Notification
Target Audience:	CLECs, Resellers
Subject:	CMP – Unbundled Network Elements-Platform (UNE-P) – General Information, Unbundled Network Element Switching (UBS), & Negotiations Template Agreement
Level of Change:	Level 1
Associated CR Number or System Release Number:	Not Applicable

Summary of Change:

On September 25, 2002, Qwest will post updates to its Wholesale Product Catalog that include corrections, clarifications and additional information for Unbundled Network Elements – Platform (UNE-P) – General Information, Unbundled Network Element Switching (UBS) and the Negotiations Template Agreement.

Corrections, clarifications and/or additional information that does not change the product or process have been made to Unbundled Network Elements – Platform (UNE-P) – General Information, Unbundled Network Elements Switching (UBS), and the Negotiations Template Agreement. Specifically, Qwest has clarified the means by which it will count end-user lines in the Qwest Density Zone 1 wire centers for the purposes of applying market-based rates for Unbundled Local Switching, including Unbundled Local Switching provided as part of UNE-P combinations.

You will find a summary of these updates on the attached Web Change Notification Forms. Actual updates to the operational documents are found on the Qwest Wholesale Web Site at these URLs:

UNE-P: <http://www.qwest.com/wholesale/pcat/unep.html>

UBS: <http://www.qwest.com/wholesale/pcat/unswitch.html>

Negotiations Template Agreement: <http://www.qwest.com/wholesale/clecs/negotiations.html>

Comment Cycle:

No formal comment cycle applies. If you have any questions on this subject, please submit comments to the CMP Manager at cmpr@qwest.com.

Sincerely,

Qwest

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.



WEB CHANGE NOTIFICATION FORM:

Attention: Changes have been made to the Qwest's Wholesale Markets Web Page URL
<http://www.qwest.com/wholesale/>

Product(s) Impacted: Unbundled Network Elements-Platforms (UNE-P) – General Information

Effective Date: September 25, 2002

Updated information/documentation will be posted to the Wholesale Markets web site that impact Unbundled Network Elements-Platform (UNE-P) – General Information for Wholesale Interconnection.

This information will be found at URL: <http://www.qwest.com/wholesale/pcat/une-p.html>

If you do not see the following updates, hit the reload button on your Netscape Navigator, or refresh under view within Internet Explorer.

All updates are consistent with the information available in the Statement of Generally Available Terms (SGAT) URL <http://www.qwest.com/about/policy/sgats/>

Section	Sub Section	UPDATE / ACTIVITY
Pricing	Rates	<p>UNE-P products are available in Qwest Wire Centers where technically feasible. The FCC LINE Remand Order allows Qwest is allowed to charge market-based rates for UBS and the UBS element of UNE-P service when your end-users have four or more exceed three access lines in certain specified Zone 1 Metropolitan Statistical Area (MSA) Qwest wire centers ADD PERIOD as defined in the FCC's UNE Remand Order. See following table for Metropolitan Statistical Area (MSA) Exempt Wire Centers.</p> <p>In these specified the exempt wire centers, you may order UBS or UNE-P for your end-users with three access lines or fewer at UNE rates. When an end-user exceeds three or more UBS or UNE-P access lines, Qwest may bill market-based rates will apply to for the UBS service or the UBS element of all four or more UNE-P lines. The UBS product and the UBS element of UNE-P service includes the port, Local Switching Originating MOU, and vertical switch features. For UNE-P, charges for the loop and shared transport will remain at UNE rates.</p> <p>For UNE-P services, determination whether application of market-based rates apply will be made by counting calculated using the number of voice grade service equivalent access lines equivalents you order for your individual end-users at a given location End-user listed name will be used to determine which lines belong to an individual end-user. Each UNE-P POTS, UNE-P PAL, UNE-P ISDN BRI, UNE-P Centrex 21, or UNE-P PBX analog trunk combination counts as one dial-tone voice grade equivalent access line. Your end-</p>

		<p>user is defined by listed name within each exempt wire center. For purposes of determining the exclusion, an 'end-user' by such definition might have access lines at more than one service of listed address within the excluded wire center, all of which would be counted for purposes of determining the number of access lines.</p> <p>DELETE Currently Qwest is ADD currently charging DELETE billing UNE rates ADD for all in-service UBS, including UBS provided as an element of UNE-P combination services. However, Qwest reserves the right to charge market-based rates for such UBS as allowed by the FCC. At such time as Qwest determines to begin charging market-based rates, DELETE regardless of the market-based rate exemption. When Qwest's systems are capable of allowing identification and billing of market-based rates, you will be notified of the ADD rate DELETE pending billing change by Product Announcement and Change Management Process (CMP) channels.</p>
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WEB CHANGE NOTIFICATION FORM:

Attention: Changes have been made to the Qwest's Wholesale Markets Web Page URL
<http://www.qwest.com/wholesale/>

Product(s) Impacted: Unbundled Network Elements – Switching (UBS)

Effective Date: September 25, 2002

Updated information/documentation will be posted to the Wholesale Markets web site that impact Unbundled Network Elements – Switching (UBS) for Wholesale Interconnection.

This information will be found at URL: <http://www.qwest.com/wholesale/pcat/unswitch.html>

If you do not see the following updates, hit the reload button on your Netscape Navigator, or refresh under view within Internet Explorer.

All updates are consistent with the information available in the Statement of Generally Available Terms (SGAT) URL <http://www.qwest.com/about/policy/sgats/>

Section	Sub Section	UPDATE / ACTIVITY
Pricing	Rate Structure	<p>Vertical features will be offered as options for Unbundled Local Switching at rates listed in Exhibit A of the SGAT (Link blue text to: http://www.qwest.com/about/policy/sgats/) for the relevant state. Exhibit A contains the UNE rates and the market-based rates for this component of Unbundled Local Switching. UNE rates apply unless the end-user to be served has four access lines or more and the lines are located in wire centers located in Density Zone 1 in Metropolitan Statistical Areas (MSAs) specified in the state-specific SGAT (Link blue text to: http://www.qwest.com/about/policy/sgats/, then market-based rates apply.</p> <p>The MSA Qualification is defined in the FCC's UNE Remand Order. Qwest is exempt from the requirement to provide unbundled switching for end-users with four or more access line equivalents within certain Qwest exempt wire centers (listed below and in each state SGAT), or Qwest may charge market-based rates for such unbundled switching. Qwest will charge market-based rates for unbundled switching in these "exempt" wire centers. However, Qwest is not able at the time of this update to implement billing of market-based rates. When Qwest's systems are capable of allowing identification and billing of market-based rates you will be notified of the pending billing change by Product Announcement and the Change Management Process (CMP) described in Exhibit G of the SGAT for the relevant state. (Link blue text to: http://www.qwest.com/about/policy/sgats/)</p> <p>In the "exempt" wire centers, you may order the Local Switching UNE for your end-users with three access lines or less at UNE rates. If you have four or more access lines for an individual end-user within the exempt wire centers, market-based rates will apply to the Local Switching UNE. The Local Switching</p>

		<p>UNE includes port, local switch MOUs, and vertical switch features.</p> <p>DELETE When your end-user has three or less access lines and adds additional access lines/local Switching UNEs (i.e., increasing to four or more), market based unbundled switching rates will apply to the unbundled local switching elements for all four or more access lines.</p> <p>DELETE Application of unbundled local switching market-based rates will be calculated using the number of DSO equivalents you order for your individual end-users. Each Plain Old Telephone Service (POTS), ISDN-BRI, or PBX analog trunk counts as one DSO equivalent/access line.</p> <p>DELETE Your end-user is defined by Listed Name within each exempt wire center. For purposes of determining the exclusion an 'end-user' by such definition might have access lines at more than one service or listed address within the excluded wire center, all of which would be counted for purposes of determining the number of access lines.</p> <p>ADD The FCC UNE Remand Order allows Qwest to charge market-based rates for UBS and the UBS element of Unbundled Network Elements - Platform (UNE-P) (Link blue text to: http://www.qwest.com/wholesale/poal/inep.html) service when your end-users have four or more access lines in specified Zone 1 Metropolitan Statistical Area (MSA) Qwest wire centers.</p> <p>ADD In these specified wire centers, you may order UBS or UNE-P for your end-users with three access lines or fewer at UNE rates. When an end-user exceeds three UBS or UNE-P access lines, Qwest may bill market-based rates for the UBS service or the UBS element of all four or more UNE-P lines. The UBS product and the UBS element of UNE-P service includes the port, Local Switching Originating MOU, and vertical switch features. For UNE-P, charges for the loop and shared transport will remain at UNE rates.</p> <p>ADD For UNE-P services, determination whether market-based rates apply will be made by counting the number of voice grade service equivalent access lines you order for your individual end-users at a given location. End user listed name will be used to determine which lines belong to an individual end user. Each Plain Old Telephone Service (e.g., 1FR, 1FB, Centrex), ISDN-BRI, or PBX analog trunk counts as one DSO equivalent/access line.</p> <p>ADD Qwest is currently charging UNE rates for all in-service UBS, including UBS provided as an element of UNE-P combination services. However, Qwest reserves the right to charge market-based rates for such UBS as allowed by the FCC. At such time as Qwest determines to begin charging market-based rates, you will be notified of the rate change by Product Announcement and Change Management Process (CMP) channels.</p> <p>ADD Fourteen Density Zone 1 Wire Centers located within the FCC-specified MSAs have been identified in the Qwest Territory.</p> <p>DELETE The fourteen Density Zone 1 exempt wire centers</p>
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Identified in the FCC's Remand Order with specified MSA qualifications are as follows:

DELETE Metropolitan Statistical Area (MSA) ADD MSA Exempt Wire Centers	CLLI
Denver, CO	DNVRCOCH DNVRCOCP DNVRCODC DNVRCOMA DNVRCONO
Minneapolis/St. Paul, MN	MPLSMNDT STPLMNBE STPLMNMK
Phoenix, AZ	PHNXAZMA PHNXAZNO
Portland, OR	PTLDOR69
Salt Lake City, UT	SLKCUTMA
Seattle, WA	STTLWA06 STTLWAEL

Pricing	Rate Structure	<p>DELETE Market based rates apply for Unbundled Local Switching when:</p> <ul style="list-style-type: none"> Your end-user has four or more access lines. The lines are located in wire centers in Density Zone 1 in MSAs specified in the SGAT for the relevant state (Link blue text to: http://www.qwest.com/about/policy/sgats/). Qwest defined Density Zone 1 on January 1, 1999. Enhanced Extended Loop (EEL) (Link blue text to: http://www.qwest.com/wholesale/pca/eel.html) are available as applicable in your state.
Implementation	Billing	<p>DELETE Qwest is currently unable to implement billing of Market Based Rates for MSA (Link blue text to Anchor Metropolitan Statistical Area (MSA) Qualification) "exempt" wire centers. Once Qwest systems are capable of allowing identification and billing of Market Based Rates, you will be notified of the pending billing change by Product Announcement and CMP described in Attachment G of the SGAT for the relevant state. (Link blue text to: http://www.qwest.com/about/policy/sgats/)</p>



WEB CHANGE NOTIFICATION FORM:

Attention: Changes have been made to the Qwest's Wholesale Markets Web Page URL
<http://www.qwest.com/wholesale/>

Business Procedures Impacted: Negotiations Template Agreement

Effective Date: September 25, 2002

Updated information/documentation will be posted to the Wholesale Markets web site that impact Negotiations Template Agreement

This information will be found at URL: <http://www.qwest.com/wholesale/clecs/negotiations.html>

If you do not see the following updates, hit the reload button on your Netscape Navigator, or refresh under view within Internet Explorer.

All updates are consistent with the information available in the Statement of Generally Available Terms (SGAT) URL <http://www.qwest.com/about/policy/sgats/>

Section	Sub Section	UPDATE / ACTIVITY
Product Name		Negotiations Template Agreement – DELETE V31.0 ADD V32.0
History Log		History Log (Link blue text to: replace existing download with attached Neg Temp Agreement History Log)
Amendments for Products and Services Not in the Filed SGATs		• ADD Unbundled Local Switching – Exception to UNE Pricing Amendment (Link blue text to: Unbundled Local Switching: Exception to UNE Pricing Amendment)



**Unbundled Local Switching - Exception to UNE Pricing Amendment
to the Interconnection Agreement between
Qwest Corporation and**

_____ **for the State of** _____

This is an Amendment ("Amendment") for _____ to the Interconnection Agreement between Qwest Corporation "Qwest", a Colorado corporation, and _____ ("CLEC"). CLEC and Qwest shall be known jointly as the "Parties".

RECITALS

WHEREAS, CLEC and Qwest entered into an Interconnection Agreement ("Agreement") for service in the state of _____ which was approved by the _____ Commission ("Commission"); and

WHEREAS, the Parties wish to amend the Agreement further under the terms and conditions contained herein.

AGREEMENT

NOW THEREFORE, in consideration of the mutual terms, covenants and conditions contained in this Amendment and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

Amendment Terms

The Agreement is hereby amended by replacing terms and conditions, Sections 9.11.2.5 and 9.11.2.5.7, and 9.11.2.5.7.1, as set forth in the Agreement, for Unbundled Local Switching as set forth in Attachment 1, to this Amendment, attached hereto and incorporated herein by this reference.

Effective Date

This Amendment shall be deemed effective upon approval by the Commission; however, the Parties may agree to implement the provisions of this Amendment upon execution. To accommodate this need, CLEC must generate, if necessary, an updated Customer Questionnaire. In addition to the Questionnaire, all system updates will need to be completed by Qwest. CLEC will be notified when all system changes have been made. Actual order processing may begin once these requirements have been met.

Further Amendments

Amendments; Waivers. The provisions of this Agreement, including the provisions of this sentence, may not be amended, modified or supplemented, and waivers or consents to departures from the provisions of this Agreement may not be given without the written consent thereto by both Parties' authorized representative. No waiver by any party of any default, misrepresentation, or breach of warranty or covenant hereunder, whether intentional or not, will be deemed to extend to any prior or subsequent default, misrepresentation, or breach of warranty or covenant hereunder or affect in any way any rights arising by virtue of any prior or subsequent such occurrence.

Entire Agreement. This Agreement (including the documents referred to herein) constitutes the full and entire understanding and agreement between the parties with regard to the subjects of this Agreement and supersedes any prior understandings, agreements, or representations by or between the parties, written or oral, to the extent they relate in any way to the subjects of this Agreement.



Qwest Corporation

Signature

Name Printed/Typed

Title

Date

Signature

Name Printed/Typed

Title

Date



Arizona

9.11.2.5 Unbundled Local Switching does not constitute a Unbundled Network Element (UNE), and is therefore not available at UNE rates, when CLEC's End User Customer to be served with Unbundled Local Switching has four (4) or more access lines at a given location, and the lines are located in density zone 1 in specified Metropolitan Statistical Areas (MSAs). An exception would be when CLEC orders EEL in density zone one of the top fifty (50) MSAs and Qwest cannot provision the service. Unbundled Local Switching is available at market-based rates when CLEC's End User Customer to be served with Unbundled Local Switching has four (4) or more access lines at a given location and the lines are located in density zone 1 in specified MSAs. This exception applies to density zone 1 as it was defined by Qwest on January 1, 1999.

9.11.2.5.7 CLEC may order new Unbundled Local Switching or Unbundled Network Element – Platform (UNE-P) Combinations in quantities that exceed three (3). If CLEC orders four (4) or more such Unbundled Local Switching elements or UNE-P Combinations for an individual End User Customer at a given location within the Wire Center(s) identified above in this section, market-based rates for the Unbundled Local Switching elements or for the unbundled switching component of the UNE-P service as provided in Exhibit A of the Statements of Generally Available Terms and Conditions (SGAT's) shall apply.

9.11.2.5.7.1 When a CLEC's End User Customer with three (3) lines or fewer served by UNE-P or unbundled switching adds lines so that it has four (4) or more lines at a given location, CLEC shall do one of the following regarding the original three (3) Unbundled Local Switching elements or UNE-P lines within sixty (60) days from the date the fourth line is added: 1) CLEC may retain such unbundled switching lines at a market-based rate or retain such UNE-P lines as UNE-P Combinations with a market-based rate for the unbundled switching component shown in Exhibit A of the SGAT; or 2) CLEC shall convert such lines from UNE-P lines or unbundled switching elements to resold services or other appropriate arrangement.

All other states:

9.11.2.5 Unbundled Local Switching does not constitute a UNE, and is therefore not available at UNE rates, when CLEC's End User Customer to be served with Unbundled Local Switching has four (4) or more access lines at a given location, and the lines are located in density zone 1 in specified Metropolitan Statistical Areas (MSAs). Unbundled Local Switching is available at market-based rates when CLEC's End User Customer to be served with Unbundled Local Switching has four (4) or more access lines at a given location and the lines are located in density zone 1 in specified MSAs. This exception applies to density zone 1 as it was defined by Qwest on January 1, 1999.

9.11.2.5.7 CLEC may order new Unbundled Local Switching or UNE-P Combinations in quantities that exceed three (3). If CLEC orders four (4) or more such Unbundled Local Switching elements or UNE-P Combinations for an individual End User Customer at a given location within the Wire Center(s) identified above in this section, market-based rates for the Unbundled Local Switching elements or for the unbundled switching component of the UNE-P service as provided in Exhibit A of the SGAT shall apply.

9.11.2.5.7.1 When a CLEC's End User Customer with three (3) lines or fewer served by UNE-P or unbundled switching adds lines so that it has four (4) or more lines at a given location, CLEC shall do one of the following regarding the original three (3) Unbundled Local Switching elements or UNE-P lines within sixty (60) days from the date the fourth line is added: 1) CLEC may retain such unbundled switching lines at a market-based rate or retain such UNE-P lines as UNE-P



Combinations with a market-based rate for the unbundled switching component shown in Exhibit A of the SGAT; or 2) CLEC shall convert such lines from UNE-P lines or unbundled switching elements to resold services or other appropriate arrangement.

**Unbundled Local Switching - Exception to UNE Pricing Amendment
to the Interconnection Agreement between
Qwest Corporation and**

for the State of _____

This is an Amendment ("Amendment") for _____ to the Interconnection Agreement between Qwest Corporation "Qwest", a Colorado corporation, and _____ ("CLEC"). CLEC and Qwest shall be known jointly as the "Parties".

RECITALS

WHEREAS, CLEC and Qwest entered into an Interconnection Agreement ("Agreement") for service in the state of _____ which was approved by the _____ Commission ("Commission"); and

WHEREAS, the Parties wish to amend the Agreement further under the terms and conditions contained herein.

AGREEMENT

NOW THEREFORE, in consideration of the mutual terms, covenants and conditions contained in this Amendment and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Parties agree as follows:

Amendment Terms

The Agreement is hereby amended by replacing terms and conditions, Sections 9.11.2.5 and 9.11.2.5.7, and 9.11.2.5.7.1, as set forth in the Agreement, for Unbundled Local Switching as set forth in Attachment 1, to this Amendment, attached hereto and incorporated herein by this reference.

Effective Date

This Amendment shall be deemed effective upon approval by the Commission; however, the Parties may agree to implement the provisions of this Amendment upon execution. To accommodate this need, CLEC must generate, if necessary, an updated Customer Questionnaire. In addition to the Questionnaire, all system updates will need to be completed by Qwest. CLEC will be notified when all system changes have been made. Actual order processing may begin once these requirements have been met.

Further Amendments

Amendments; Waivers. The provisions of this Agreement, including the provisions of this sentence, may not be amended, modified or supplemented, and waivers or consents to departures from the provisions of this Agreement may not be given without the written consent thereto by both Parties' authorized representative. No waiver by any party of any default, misrepresentation, or breach of warranty or covenant hereunder, whether intentional or not, will

_____ Amd CLEC name/state

be deemed to extend to any prior or subsequent default, misrepresentation, or breach of warranty or covenant hereunder or affect in any way any rights arising by virtue of any prior or subsequent such occurrence.

Entire Agreement. This Agreement (including the documents referred to herein) constitutes the full and entire understanding and agreement between the parties with regard to the subjects of this Agreement and supersedes any prior understandings, agreements, or representations by or between the parties, written or oral, to the extent they relate in any way to the subjects of this Agreement.

Qwest Corporation

Signature

Signature

Name Printed/Typed

Name Printed/Typed

Title

Title

Date

Date

Arizona

9.11.2.5 Unbundled Local Switching does not constitute a UNE, and is therefore not available at UNE rates, when CLEC's End User Customer to be served with Unbundled Local Switching has four (4) or more access lines at a given location, and the lines are located in density zone 1 in specified Metropolitan Statistical Areas (MSAs). An exception would be when CLEC orders EEL in density zone one of the top fifty (50) MSAs and Qwest cannot provision the service. Unbundled Local Switching is available at market-based rates when CLEC's End User Customer to be served with Unbundled Local Switching has four (4) or more access lines at a given location and the lines are located in density zone 1 in specified MSAs. This exception applies to density zone 1 as it was defined by Qwest on January 1, 1999.¹

9.11.2.5.7 CLEC may order new Unbundled Local Switching or UNE-P Combinations in quantities that exceed three (3). If CLEC orders four (4) or more such Unbundled Local Switching elements or UNE-P Combinations for an individual End User Customer at a given location within the Wire Center(s) identified above in this section, market-based rates for the Unbundled Local Switching elements or for the unbundled switching component of the UNE-P service as provided in Exhibit A to this Agreement shall apply.

9.11.2.5.7.1 When a CLEC's End User Customer with three (3) lines or fewer served by UNE-P or unbundled switching adds lines so that it has four (4) or more lines at a given location, CLEC shall do one of the following regarding the original three (3) Unbundled Local Switching elements or UNE-P lines within sixty (60) days from the date the fourth line is added: 1) CLEC may retain such unbundled switching lines at a market-based rate or retain such UNE-P lines as UNE-P Combinations with a market-based rate for the unbundled switching component shown in Exhibit A of this Agreement; or 2) CLEC shall convert such lines from UNE-P lines or unbundled switching elements to resold services or other appropriate arrangement.

All other states:

9.11.2.5 Unbundled Local Switching does not constitute a UNE, and is therefore not available at UNE rates, when CLEC's End User Customer to be served with Unbundled Local Switching has four (4) or more access lines at a given location, and the lines are located in density zone 1 in specified Metropolitan Statistical Areas (MSAs). Unbundled Local Switching is available at market-based rates when CLEC's End User Customer to be served with Unbundled Local Switching has four (4) or more access lines at a given location and the lines are located in

¹ Qwest has not implemented market-based rates for stand-alone Unbundled Local Switching nor for Unbundled Local Switching as supplied with UNE-P combinations. Qwest currently offers stand-alone Unbundled Local Switching and UNE-P combinations in all Qwest geographic locations at TELRIC rates. However, Qwest reserves the right to charge market-based rates for stand-alone Unbundled Local Switching and for Unbundled Local Switching as supplied with UNE-P combinations as described in Section 9.11.2.5.

density zone 1 in specified MSAs. This exception applies to density zone 1 as it was defined by Qwest on January 1, 1999.²

9.11.2.5.7 CLEC may order new Unbundled Local Switching or UNE-P Combinations in quantities that exceed three (3). If CLEC orders four (4) or more such Unbundled Local Switching elements or UNE-P Combinations for an individual End User Customer at a given location within the Wire Center(s) identified above in this section, market-based rates for the Unbundled Local Switching elements or for the unbundled switching component of the UNE-P service as provided in Exhibit A to this Agreement shall apply.

9.11.2.5.7.1 When a CLEC's End User Customer with three (3) lines or fewer served by UNE-P or unbundled switching adds lines so that it has four (4) or more lines at a given location, CLEC shall do one of the following regarding the original three (3) Unbundled Local Switching elements or UNE-P lines within sixty (60) days from the date the fourth line is added: 1) CLEC may retain such unbundled switching lines at a market-based rate or retain such UNE-P lines as UNE-P Combinations with a market-based rate for the unbundled switching component shown in Exhibit A of this Agreement; or 2) CLEC shall convert such lines from UNE-P lines or unbundled switching elements to resold services or other appropriate arrangement.

_____ Amd CLEC name/state