

BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of: )  
 ) Docket No. UT-033044  
QWEST CORPORATION )  
 )  
To Initiate a Mass-Market Switching and )  
Dedicated Transport Case Pursuant to the )  
Triennial Review Order )  
\_\_\_\_\_ )

COMMENTS OF  
McLEODUSA TELECOMMUNICATIONS SERVICES, INC.  
CONCERNING QWEST CORPORATION'S PROPOSED  
BATCH HOT CUT PROCESS

**McLeodUSA**  
**Comments Concerning**  
**Qwest Proposed Batch Hot Cut Process**

McLeodUSA Telecommunication Services, Inc. (“McLeodUSA”) provides the following comments on Qwest Corporation’s (“Qwest’s”) proposed region-wide Batch Hot Cut (“BHC”) process. Qwest has not yet finalized its proposed region-wide BHC process, and therefore, McLeodUSA reserves the right to provide additional comments.

Accordingly, McLeodUSA makes the following comments:

1. Qwest must clarify the maximum/minimum line volumes per day per CLEC for the BHC.
2. Qwest must clarify the definition of “Basic Installation” and project managed hot cut.
3. Qwest should clarify the intervals per batch and what the dependencies are per LSR. Intervals should meet the UNE-P standard interval.
4. Qwest should specify the assumptions and exceptions made per batch. (Types of orders, volume limits, etc).
5. Scalability. Any BHC process must be automated in order to migrate both current UNE-P volumes and, equally important to the ultimate goal of achieving facilities-based competition on strictly a UNE-L platform, to timely process future UNE-L orders in order to minimize or eliminate service disruptions to customers. Qwest must explain how its proposal based on manually preparing and submitting a spreadsheet for BHCs could possibly be scalable.
6. Economic. The FCC stressed one of the key factors for concluding that impairment exists in switching mass market customers involves the cost of the non-recurring charges (NRCs) charged to CLECs. Qwest must specifically quantify all proposed NRCs involved in the BHC process. NRCs for a UNE-L conversion must move significantly closer to the current level of NRCs applicable to UNE-P conversions to truly eliminate the impairment.
7. Scope. CLEC to CLEC migrations must also be included in the BHC process, in addition to Qwest Retail to UNE-L; Resale to UNE-L; Centrex/IFB to UNE-L. This is especially important if the eventual elimination of UNE-P leads to some fraction of UNE-P carriers opting out of a market. Lack of a CLEC to CLEC process means customers served by a defunct UNE-P carrier would default to the ILEC because of the lack of such a process. Provisioning of loops served off an IDLC must also be included in any BHC process.

8. Qwest must explain its proposed intervals for this new BHC process. Our assumption is that the current 5-day interval will be the interval for the new BHC process.
9. Qwest should provide the daily line count threshold that it can handle from a switch translation, collocation and service center perspective for its own UNE-P and retail migrations. Parity must be maintained.
10. Testing. Qwest should be required to test any proposed BHC process before a Commission makes a finding on whether CLECs are impaired in switching mass-market customers. Qwest must also ensure that associated vendors (numbering administrator, E911 administrator, etc.) can handle any increased loads.
11. The BHC process needs to provide system flow-through end to end, prior to going live with the BHC process.
12. Any pre-order, order, or post-order functionality to support any BHC process must be developed in both EDI and GUI. Qwest has only promised to build the functionality in their GUI, and has not agreed to develop the same functionality in EDI (i.e.; Reservation tool, etc.). A CLEC should not be forced to go outside of its primary OSS interface in order to utilize this BHC process.
13. Qwest should outline its “throw back process” and bad Customer Facilities Assignment process for the BHCs in order to understand customer impact.
14. In order to minimize service disruption to customers that want to switch from Qwest to a UNE-L CLEC, the proposed BHC process must be expanded beyond the all-day commits under a “Basic Installation” scheme. Any new BHC process must also provide a coordinated hot cut option in order to accomplish the FCC’s goal of minimal/zero disruption to the customer.

DATED this 18th day of November, 2003.

DAVIS WRIGHT TREMAINE LLP  
Attorneys for McLeodUSA Telecommunications  
Services, Inc.,

By \_\_\_\_\_  
Gregory J. Kopta