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 ESCHELON TELECOM OF WASHINGTON, INC. REGARDING QWEST CORPORATION'S PROPOSAL FOR A REGION-WIDE BATCH LOOP CONVERSION PROCESS

ESCHELON'S COMMENTS ON QWEST'S PROPOSED BATCH HOT CUT PROCESS

On October 31, 2003, AT&T, MCI, and Qwest proposed a multi-state forum, including a schedule and procedural requirements, to allow all interested parties and states to develop a single, uniform batch hot cut process for all states within Qwest's region. On November 12, 2003, Qwest submitted its batch hot cut proposal ("Qwest Proposal").[1] In addition to the proposal, Qwest described its current ordering and conversion process.

Eschelon Telecom of Washington, Inc. ("Eschelon") submits the following responsive comments on Qwest's current process, recent performance, and proposed Batch Hot Cut process. Eschelon has participated in Qwest's current Hot Cut process in Arizona, Colorado, Minnesota, Oregon, Utah, and Washington in order to migrate small business customers to Eschelon's switches. Eschelon also orders UNE-P to serve customers in areas that cannot be served by its switches.

Qwest's proposed Batch Hot Cut does not address critical elements necessary for an efficient process. Instead, Qwest's proposal eliminates important steps and adds additional manual processes to the Hot Cut process that will put end users at risk.

I. Qwest's description of its current Hot Cut process and performance is at best incomplete and is frequently inaccurate.

Qwest's Proposal includes several exhibits and recent testimony from William M. Campbell from its Arizona 271 application ("Campbell Declaration"). While these documents address many issues completely unrelated to Hot Cuts, Qwest fails to discuss basic components

[1] Qwest submitted substantially similar comments before multiple Commissions. For purpose of citation, Eschelon refers to the proposal filed the Utah Commission in the Matter of a Proceeding to Address Actions Necessary to Respond to the Federal Communications Commission Triennial Review Order Released August 21, 2003, Docket No. 03-999-04.

of the Hot Cut process.

A. Qwest fails to describe all the steps involved in a Hot Cut.

The FCC has defined a coordinated loop cut over or Hot Cut[2] as:

> [A] largely manual process requiring incumbent LEC technicians to manually disconnect the customer's loop, which was hardwired to the incumbent LEC switch, and physically re-wire it to the competitive LEC switch, while simultaneously reassigning (i.e., porting) the customer's original telephone number from the Incumbent LEC switch to the competitive LEC switch. From the time the technician disconnects the subscribers [sic] loop until the competitor reestablishes service, the subscriber is without service. Simultaneously, incumbent LEC and competitor technicians must coordinate to ensure that the subscriber's telephone number is "ported" to the competitor's switch so that inbound calls are properly routed to the requesting carrier's switch. This process necessarily disconnects service to the customer for a brief period of time, as the physical connection between the loop and incumbent LEC switch is broken and then a new connection with the competitive LEC switch is made. The process of number porting also potentially subjects the customer to some period of time where incoming calls will not be received (i.e., until the number porting process is correctly completed, the customer's number will not correctly route incoming calls to the competitive LEC switch now serving that customer)…[3]

Qwest asserts that it has "a detailed procedure that defines the hot cut process" and refers the reader to its Exhibit 2.[4] Exhibit 2 contains both an Unbundled Loop Provisioning Flow and an Unbundled Loop Provisioning Task List. As discussed in the next section, neither document is exclusively related to Hot Cut process flows and tasks. However, for purposes of this section, it is critical to recognize how little detail Qwest provides to describe the complex task of completing a Hot Cut and how much CLEC activity is ignored in Qwest's documents.

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[2] Newton's Telecom Dictionary, 19th Ed, defines a Hot Cut as synonymous with a Flash Cut or Cutover. Newton's defines a Cutover as "[t]he physical changing of lines or trunks from one phone system to another…It is usually done over the weekend, accompanied by heavy praying that everything will go right." Pp 215, 328, and 386.

[3] Report and Order, *Review of the Section 251 Unbundling Obligation of Incumbent Local Exchange Carriers*, CC Dkt. No. 01-338, FCC 03-36 (rel. Aug. 21, 2003) ("*Triennial Review Order*" or "*TRO*"), para 465 FN 1409 citations omitted.

[4] The document labeled Exhibit 2 included in the electronic file received by Eschelon contains the header "Exhibit WMC-LOOP-3". Comments at 7.

Exhibit A to these comments describes the process that Eschelon follows to complete a Hot Cut.[5] Qwest's description of the current Hot Cut process ignores the majority of the process (i.e., Qwest skips straight from Step 3B to Step 7). By doing so, Qwest ignores critical Hot Cut processes such as:

- Qwest sending an email 48 hours prior to the Hot Cut to verify dial tone;
- Testing and troubleshooting steps taken if dial tone is not present 48 hours prior to the Hot Cut;
- Testing and troubleshooting steps taken prior to Qwest commencing the Hot Cut on the due date;
- Testing and troubleshooting steps taken after Qwest has notified CLEC that central office work has been completed;
- The number porting process;
- Testing and troubleshooting steps taken during number porting; and
- Testing and troubleshooting steps taken after number porting.

Relying on Qwest's documentation would leave the reader with the perception that Hot Cuts are simple to do, completed entirely by Qwest, and that no problems are ever encountered. This is not the case.

B. Qwest overstates the quantity of Hot Cuts it performs.

Rather than fully discussing the Hot Cut process, Qwest chose instead to spend a large portion of its comments describing how Qwest's performance was reviewed by the FCC in the

[5] In the next section Eschelon describes the differences between a Basic and Coordinated Hot Cut. In terms of the process flow, the only difference would be in Step 3A. In a Basic Hot Cut, Qwest would initiate the Hot Cut by calling the CLEC at any time of its choosing (i.e., sometime between 8:00 AM and 5:00 PM) on the due date.

271 process. This digression is not necessary because the FCC has already determined that, "the number of Hot Cuts performed by BOCs in connection with the section 271 process is not comparable to the number that incumbent LECs would need to perform if unbundled switching were not available for all customer locations served with voice-grade loops."[6]

Nevertheless, Qwest's claims raise more questions than they answer because Qwest appears to be talking about the provisioning of loops in general, rather than Hot Cuts.

1. Qwest fails to support its characterization of the quantity of Hot Cuts it completes.

Qwest attempts to create the impression that "it uses its current processes to provision approximately 1,000 hot cuts per day on average…"[7] Qwest provides no citation for this figure. Qwest should be required to provide support for its claim of the number of Hot Cuts it performs. Nevertheless, Eschelon has attempted to piece together Qwest's methodology from the performance data contained in Qwest's Exhibit 3.

Qwest's Exhibit 3 contains Qwest's most recent results for the Performance Indicator Definition ("PID") OP-3 for the product Unbundled Loops-Analog. OP-3 measures the percentage of installation commitments met. This percentage is calculated by dividing the number of circuits delivered "on-time" by the number of circuits delivered. The column labeled "CLEC denominator" represents the number of analog loops delivered by Qwest in a given month. In OP-3, Qwest disaggregates its reporting into two Interval Zones. It appears that Qwest is using September 2003 data as the basis for its claim because previous months had significantly lower installation volumes. In September 2003, Qwest delivered 13,328 analog loops in Interval Zone One and 9,680 in Interval Zone Two for a total of 23,008 analog loops.

To translate this monthly installation figure into a per day figure, assumptions need to be

[6] TRO at para 469.
[7] Comments at 7.

made as to whether to use business days or calendar days. As CLECs can request out-of-hours Hot Cuts, calendar days may be the appropriate approach. As Qwest did not describe its methodology, it is unclear whether Qwest used calendar or business days. For the remainder of this document, Eschelon uses calendar days to calculate averages. This approach means that Qwest installed an average of 767 loops a day over its entire fourteen-state region in September.

Individual state results can be calculated by using Qwest's state-specific reports in Exhibit 4.[8] In Utah, for example, Qwest installed an average of 61 analog loops per day in September 2003 using the above methodology.

While Qwest's provisioning results (OP-3) may not support Qwest's 1,000-Hot-Cuts-a-day claim, it is important to recognize that installing loops and performing Hot Cuts are not synonymous.

2. Not every installation is a Hot Cut.

While all Hot Cuts involve installation of a loop, not all loop installations involve a Hot Cut. To illustrate this distinction, it would be helpful to describe the installation options that Eschelon orders (and why).

When Eschelon needs to transition service for an end user served by another LEC's switch (i.e., a Hot Cut), Eschelon orders a Coordinated Installation. The coordinated installation options allow the CLEC to designate a specific appointment time on the date when Qwest will install the loop. Qwest admits that coordination is "often needed by the CLEC in order to have a seamless installation for the end-user."[9]

Eschelon orders a non-coordinated, or Basic, installation only when it orders a new loop

[8] Qwest's published reports for individual states can be viewed at: http://www.qwest.com/wholesale/results/roc.html.
[9] Campbell Declaration at 23.

(i.e., when no Hot Cut is involved because facilities are not re-used). Eschelon does not order a Basic installation for a Hot Cut for exactly the reason identified in the Campbell Declaration. That is, to provide a seamless transition, the end user needs to know when the Hot Cut will occur (i.e. a Coordinated Hot Cut). As a Basic installation allows Qwest to start the Hot Cut any time between 8:00 AM and 5:00 PM on the due date, a seamless installation for the end-user may not occur.

Qwest did not identify the number of analog loop installations that involved actual Hot Cuts. Qwest should be required to do so. Nevertheless, a review of Qwest's PID results for OP-7 --Coordinated Hot Cut Interval, suggests that number of actual Hot Cuts may be quite small.

In OP-7, Qwest reports on the number of Coordinated Hot Cuts completed in a month. Curiously, Qwest did not provided its performance for OP-7 with its Comments. Nevertheless, Qwest's OP-7 Regional results for September 2003 indicate that Qwest provided 9,488 Coordinated Hot Cuts for analog loops.[10] This represents 316 analog loop Coordinated Hot Cuts per calendar day over Qwest's entire 14-state region.[11]

Individual state results can be determined as well. For example, in Utah, Qwest's report[12] indicates that 1,064 analog loop Hot Cuts were provided in September 2003. This represents 35 analog loop Coordinated Hot Cuts per day.[13]

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[10] See http://www.qwest.com/wholesale/downloads/2003/031024/RG_271_Oct02-Sep03_Exhibit_PID-Final.pdf at 190.

[11] As mentioned above, Qwest's September installations were above the norm. Similarly, the number of Coordinated Hot Cuts for analog loops was significantly above the norm in September 2003. For example, Qwest's August performance indicates that 7,823 (or 260 per day) were completed.

[12] See http://www.qwest.com/wholesale/downloads/2003/031024/UT_271_Oct02-Sep03_Exhibit_PID-Final.pdf at 186.

[13] September volumes for Utah were also significantly above the norm. Qwest's August performance indicates that 647 (or 22 per day) were completed.

3. Hot Cuts are performed on a per customer not a per loop basis.

When Eschelon migrates a customer, it typically migrates all of the customer's loops in a single Hot Cut. Qwest's OP-7 data provides the number of loops involved in a Coordinated Hot Cut. Qwest's OP-13 PID-Coordinated Cuts On-Time measures Qwest's performance on a per-order (or per-customer) basis. Qwest's September 2003 results indicate that Qwest completed 3,000 Coordinated Hot Cut orders.[14] This represents 100 customer migrations per day over Qwest's fourteen-state region.

Once again, individual state results can be determined as well. For example, in Utah, Qwest's report[15] indicates that Qwest completed 438 Coordinated Hot Cuts orders in September 2003. This represents 15 customer migrations per day.

Qwest PID results show that Qwest completes only 100 customer migrations via Coordinated Hot Cut per day region-wide. Whether Qwest's actual performance is 100 or 1,000 Hot Cuts per day, however, Qwest's claim that its performance results reflect "Qwest's ability to perform hot cuts for its CLEC customers in larger quantities" needs to be substantiated.[16] This is because Qwest's own performance reports indicate that 648,313 UNE-P lines were in service across its fourteen-state region as of September 2003.[17] Furthermore, UNE-P POTS lines in service alone grew by 64,347 in just September 2003.[18] These numbers are greater than the "large quantities" that Qwest claims it can perform.

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[14] See http://www.qwest.com/wholesale/downloads/2003/031024/RG_271_Oct02-Sep03_Exhibit_PID-Final.pdf at 192.
[15] See http://www.qwest.com/wholesale/downloads/2003/031024/UT_271_Oct02-Sep03_Exhibit_PID-Final.pdf at 188.
[16] Comments at 7-8.
[17] See http://www.qwest.com/wholesale/downloads/2003/031024/RG_271_Oct02-Sep03_Exhibit_PID-Final.pdf at 323.
[18] See id.

Qwest claims that the maximum number of Hot Cuts it has performed in a day is 1,350.[19] Qwest provides no support for this number. Nevertheless, even assuming Qwest can provide 1,350 Hot Cuts each and every day, Qwest would not have been able to fill 64,347 UNE-P POTS orders in the month of September if they had been ordered as analog loops at a rate of 1,350 a day.

When you consider that Qwest would have to continue to provision the 1,000 Hot Cuts a day it claims it currently provisions, conduct a migration of rapidly growing base of 650,000 UNE-P lines, and provision many additional analog loops if UNE-P were eliminated, it is clear that Qwest's past performance provides no evidence that Qwest can handle these quantities going forward.

If, instead of Qwest's maximum capability of 1,350 (or Qwest's claimed average of 1,000) Hot Cuts per day, one uses the 100 Hot Cut per day figure described above, it is even more clear that Qwest would not have been capable of migrating September's 64,347 new UNE-P POTS customers to competitive carriers' switches via Hot Cuts.

C. Qwest Overstates the Quality of the Hot Cuts it Performs.

Qwest claims that it has "provisioned unbundled loops for CLECs using [its] process at an extremely high level of quality."[20] Once again Qwest has blurred the concepts of provisioning loops and performing Hot Cuts. Thus, when Qwest refers to its provisioning performance of between 95 to 98 percent, it is unclear to what Qwest is referring.[21] Qwest should be required to provide more detail in this proceeding.

When Qwest notes that, "[m]oreover, only a small fraction of migrated loops experience

[19] Comments at 7.
[20] Comments at 7.
[21] See id.

any trouble in the 30 days following cut-over," Qwest appears to be relying on its performance under the PID OP-5 --New Service Installation Quality. Qwest notes that 97.5% to 99.99% of loops do not experience installation troubles.[22] Qwest's current OP-5, however, fails to properly capture day-of-cut troubles. That is, escalation tickets opened up with Qwest's Customer Service Inquiry and Education Center ("CSIE" or "escalation center") were not properly captured in the OP-5 results to which Qwest refers. Eschelon provided evidence of this in 271 proceedings and many months were spent over-hauling the measure to more accurately capture such troubles. Just recently, the Long Term PID Administration ("LTPA") Collaborative of Qwest, CLECs, and state commissions agreed to create a submeasure called OP-5B to capture such provisioning troubles. Qwest recently filed this PID with state commissions. However, results for OP-5B will not be available until February 2004. Only after that date will the Parties begin to be able to assess whether the revised measure captures such troubles.

The OP-5 performance cited by Qwest overstates Qwest's true performance because of the day-of-cut loophole in the PID. Furthermore, Qwest's claim that 99.99 percent of newly installed loops did not experience trouble in September 2003 across Qwest's fourteen-state region is surprising. The data provided in Qwest's Exhibit 3 states that 21,818 analog loops out of 21,821 provisioned in the reporting period were trouble free. The claim that only three troubles occurred over the entire region is surprising given that Qwest's previous results indicate several hundred troubles per month. Eschelon has asked the LTPA to look into this region-wide reporting anomaly.

II. Qwest's Comments raise additional questions for review.

Based on the various commission orders on the multi-state Batch Hot Cut process,

[22] See id.

Qwest's filing contained a surprising number of arguments related to other TRO matters.[23] For example, Qwest asserts that, "Qwest's current process does not suffer from many of the cost and operational problems that the *Triennial Review Order* identified."[24] Before addressing the significant limitations of Qwest's proposed Batch Hot Cut process, two points must be made in response to Qwest's claim.

A. Contrary to Qwest's claim, its performance measures (PIDs) do suffer from the limitations identified by the FCC.

Qwest notes that the FCC identified Verizon's failure to include project managed migrations in performance results. To support this claim Qwest notes that project-managed migrations "*are* included in Qwest's current performance data."[25]

However, Qwest's Coordinated Hot Cut PID OP-13 clearly states:

> For Projects [25 or more lines] scheduled due dates and scheduled start times will be negotiated between CLEC and Qwest, but no committed order due time is established. Therefore, projects are not included in OP-13A (See exclusion below).[26]

Qwest's performance on Projects may be included in others PIDs (such as billing), but not in the Hot Cut measurements.

Additionally, as mentioned above, the OP-5B measure recently created to capture all day-of-cut troubles will have no performance standard when it is in place in February 2004. This means that Qwest still will suffer no consequence if it provides Hot Cuts at a low level of

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[23] See, for example, the Colorado Commission's directive that, "[o]n November 12, 2003, Qwest shall file its proposed batch hot cut process; that proposal shall contain a detailed description of the process, including, but not limited to, capacity, Pre-ordering, Ordering and Provisioning, and the proposed rates for the batch hot cut activities and proposed intervals." *Order Opening Docket And Procedural Directives*, Regarding Adoption of a Batch Hot Cut Process Pursuant to 47 C.F.R. § 51.319(D)(2)(II), Docket No. 03I-485T, November 5, 2003 at 2.

[24] Comments at 2.

[25] See id. Emphasis in original.

[26] Qwest's PIDs are contained in Exhibit B to Qwest's SGAT and are available at: http://www.qwest.com/wholesale/clecs/sgatswireline.html

quality.

B. Qwest's claim that its current Hot Cut rates are lower than other ILECs is not based on all relevant Hot Cut rates and ignores key FCC guidance.

The FCC found that, "[t]he record shows that the cost of connecting each customer to the competitive LEC's switch makes it difficult to compete. Although hot cut costs vary among incumbent LECs, we find on a national level that these costs contribute to a significant barrier to entry."[27]

Qwest cites this discussion to highlight its Non-Recurring Charges ("NRCs") relative to other ILECs. Qwest quotes the FCC as mentioning NRCs "exceeding $100 and as high as $185."[28] Qwest then claims that its current NRCs for a Basic Hot Cut range between $29.10 and $65.00.[29]

Qwest fails to note, however, that the FCC indicated in the same paragraph that the record indicated an average NRC of approximately $51. Qwest also fails to note that, in the same paragraph, the FCC found that "the non-recurring costs associated with cutting over large volumes of loops would likely be prohibitively expensive for a competing carrier seeking to provide service without the use of unbundled local circuit switching."[30]

Qwest also fails to note that its Coordinated Hot Cut NRCs are much higher than the Basic charges Qwest proffers. As mentioned above, Qwest's Basic installation options allow Qwest to choose when the migration occurs. Eschelon orders Coordinated Hot Cuts. Qwest's NRCs for Coordinated Installations (with or without Cooperative Testing) generally range from $58 to $214 in the states in which Eschelon operates.[31] Qwest's own witness states that

[27] TRO at para 470 including footnotes 1444 and 1445.
[28] Comments at 16.
[29] Comments at 17.
[30] TRO at para 470 including footnotes 1444 and 1445.
[31] See, generally, Exhibit A to Qwest's SGATs at:

"Coordinated installation and testing are often needed by the CLEC in order to have a seamless installation for the end-user."[32] It is not accurate to say that Qwest "is starting from a better position than many incumbent LECs in this regard [Hot Cut NRCs]" considering Qwest's Coordinated Hot Cut NRCs.[33]

Moreover, Qwest fails to note that the FCC includes not just NRCs in its impairment analysis. The FCC also considers "the significant internal resources and expenditures that must be borne by the competitive LEC."[34] Even if Qwest's NRCs were "low", NRCs are not the only costs that must be considered in impairment proceedings.

In the next section, Eschelon discusses what a Batch Hot Cut process should contain. In the subsequent section, Eschelon describes how Qwest's proposed Batch Hot Cut process may be even less desirable because Qwest's proposal increases the other costs CLECs incur in a Hot Cut.

III. The Batch Hot Cut Process needs to be more efficient than the current manual process.

At this stage, Eschelon has been able to identify several issues that the Batch Hot Cut process may need to address. Other issues will likely be raised and addressed in this proceeding. As the Parties develop the Batch Hot Cut process, the parties should ensure that shifting burdens from Qwest to CLECs are not considered "efficiencies".

A. CLECs should have flexibility in the submission and implementation of a Batch Hot Cut.

- CLECs should be able to submit a batch in an efficient manner. This will likely require the development of new ordering capabilities. CLECs sending individual LSRs for multiple orders should not be considered a "batch."

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http://www.qwest.com/wholesale/clecs/sgatswireline.html

[32] Campbell Declaration at 23.

[33] Comments at 16.

[34] TRO at para 470 including footnotes 1444 and 1445.

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

B. The Batch Hot Cut process should not adversely impact customers.

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

- Qwest would need to develop a mechanism for the creation of accurate service orders from the batch. Creating accurate service orders should not be a manual process because of the likelihood of manual entry mistakes that would impact end users. Batch Hot Cut orders should flow-through.

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

C. The Batch Hot Cut process should be developed in a manner that accounts for all industry participants.

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

- Will a Batch contain lines from both Qwest and CLECs?
- How will prioritization be determined so that multiple carriers can submit a Batch Hot Cut while not freezing out non-batched cuts or freezing out particular central offices?
- If restrictions are placed on a CLEC's ability to complete Hot Cuts in any wire center at any time, how will comparable restrictions be applied to Qwest retail?

D. The Batch Hot Cut process should not degrade performance in other areas (e.g., DS1 capable loop installations or non-batched cuts).

To ensure that the Batch Hot Cut process does not degrade performance, Qwest will need to develop new procedures. For example:

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

E. The Batch Hot Cut process should develop efficiencies that reduce costs.

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

F. Qwest's performance metrics should measure performance of Batch Hot Cuts.

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

G. The Batch Hot Cut process should be able to handle customers served over pair gain, IDLC facilities, or remote terminals.

The Batch Hot Cut process needs to address the barriers and issues presented by pair gain, IDLC facilities, or remote terminals. CLECs, unlike Qwest, currently have to identify and address these situations, generally, on a line-by-line basis. A batch-appropriate process is needed.

H. The Batch Hot Cut process should be tested prior to its application to actual CLEC customers.

Whatever the characteristics of the Batch Hot Cut process is ultimately developed, it is important the process be tested prior to implementation. Until the process has actually demonstrated that it is more efficient and cheaper, commissions should be reluctant to allow end users to be used as test subjects.

IV. Qwest's proposed Batch Hot Cut process does not address the issues that Eschelon has identified as critical to an effective process.

- Qwest's proposed Batch Hot Cut process does not allow for batches of Coordinated Hot Cuts. This means that Qwest can start an individual Hot Cut at the time of its choosing. This will preclude the "seamless installation for the end-user" that Qwest's own witness has identified as critical.[35]
- Qwest's proposed Batch Hot Cut process precludes the inclusion of loops with IDLC, loops that require conditioning, and loop splitting arrangements in the batch. These loops will continue to be processed in a manner that the FCC has already found to be a source of impairment.
- Qwest's proposed Batch Hot Cut process requires CLECs to continue to submit orders one LSR at a time. As such, Qwest's proposed Batch Hot process does nothing to reduce "the significant internal resources and expenditures which must be borne by the competitive LEC."[36]
- Qwest's proposed Batch Hot Cut process results in each LSR falling out for manual handling (i.e., the spreadsheet process). Qwest's reliance on additional manual steps can only increase the likelihood of Hot Cut troubles.

[35] Campbell Declaration at 23.
[36] TRO at para 470.

- Qwest's proposed Batch Hot Cut process is silent on the number of batches that can be accomplished per central office, per state, and per region. That is, Qwest identifies what can't be done, rather than what can be done.
- Qwest's proposed Batch Hot Cut process is silent on how CLECs are notified that Qwest has completed its portion of the Hot Cut. Until this notification occurs, customers will not be able to receive calls. The Batch Hot Cut process should not lead to all-day Hot Cuts.
- Qwest's proposed Batch Hot Cut process is silent on aspects of troubleshooting and acceptance of multiple loops within the current one-hour window. CLECs may be unable to complete all the troubleshooting work necessary to provide quality service to end users if this issue is not addressed.
- Qwest's proposed Batch Hot Cut process eliminates the critical 48-hour dial tone verification prior to cut. Elimination of a critical step that reduces Hot Cut problems is not an "efficiency". Qwest should not be able to meet its burden by creating a lesser process for CLECs and end users.
- Qwest's proposed Batch Hot Cut process does not address same-day pair changes. Again, increasing service-affecting problems by elimination of a critical step is not an "efficiency".
- Qwest's proposed Batch Hot Cut process eliminates the central office technician's call to RCMAC to work the disconnect of the UNE-P.[37] This means that the end user will be working in both switches. Anyone in the wire center trying to call the customer will be unable to do so. This will be devastating to typical Eschelon customers such as pizza shops, restaurants, insurance agents, etc., which rely on incoming calls for their livelihood. Qwest's proposed Batch Hot Cut process could easily lead to an all day cut if Qwest does the batch at

[37] See Batch Hot Cut Process Exhibit 7 at 2.

8:00 AM and pulls the translations at 6:00 PM. End users will not submit to a process that results in being unable to receive calls for an unknown (and potentially unlimited) amount of time.

- Instead of proposing intervals and performance metrics, Qwest simply says, "a failure of one order within the batch does not constitute the failure of the entire batch cut."[38] Instead of ensuring that performance measures capture performance, Qwest has chosen to worry only about the exclusion of items with trouble.
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When reviewing Qwest's proposal, consider what Qwest's own witness has identified (albeit at a very high level) as critical steps in performing a Hot Cut:

1. Contact the CLEC prior to starting the installation;
2. Complete the physical work within a specified period of time; and
3. Call the CLEC when the job is completed.[39]
4.

Qwest doesn't identify any of these steps in its proposed Batch Hot Process.[40] More work is needed.

V. CONCLUSION

Qwest's proposed Batch Hot Cut process contains at least all the same work for CLECs that is involved in the current process. It also appears to require additional work for CLECs. Rather than developing efficiencies, Qwest has chosen to eliminate important steps and add

[38] See Batch Hot Cut Process Exhibit 7 at 2.
[39] Campbell Declaration at 27.
[40] See, for example, Batch Hot Cut Process Exhibit 6.

additional manual processes to the Hot Cut process that will put end users at risk.

If a commercial airline carrier suggested that it could increase its on-time departures by eliminating safety checks, its proposal would not be accepted as one that adds efficiencies. In these Workshops, participants need to review each proposal to ensure that the result is a true efficiency and not a reduction in quality.

DATED this 18th day of November, 2003.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Eschelon Telecom of Washington, Inc.,

By _____
Gregory J. Kopta