Exhibit A to Eschelon's November 18, 2003 Comments on Qwest's Batch Hot Cut Process

Eschelon's process for transferring a customer's line(s) from a Qwest switch to an Eschelon switch generally includes the following steps. The other steps to switch a customer are not discussed here because the question asks only about the hot cut piece of the process.

Step 1: Verification of dial tone 48 hour prior to cut

A. If Qwest verifies dial tone, the cut proceeds to Step 2.
B. If Qwest fails to detect dial tone, Qwest sends an email ("48 Hour Notice") to Eschelon per the Qwest documented process. Eschelon typically takes the following steps to resolve the problem:

    1. Eschelon verifies that switch translations have been completed in the Eschelon switch. If not, Eschelon builds translations. If Qwest verifies dial tone, the cut proceeds to Step 2.
    2. Verify that the Connecting Facilities Assignment ("CFA") on the Firm Order Confirmation ("FOC") matches the Line Equipment Number ("LEN"). If not, Eschelon changes the LEN in its switch. If Qwest verifies dial tone, the cut proceeds to Step 2.
    3. If the CFA on the FOC matches the LEN, Eschelon contacts Qwest to verify the accuracy of the 48 Hour Notice. If Qwest verifies dial tone, the cut proceeds to Step 2.
    4. If there is still no dial tone, Eschelon dispatches an Eschelon technician to the collocation to verify dial tone and wiring to the ICDF. If the Eschelon technician verifies a trouble on Eschelon's side, Eschelon will correct. If the correction cannot be made quickly enough, then Eschelon will use Qwest's documented day-of-cut CFA change process. If Qwest verifies dial tone, the cut proceeds to Step 2.
    5. If the Eschelon technician verifies that the trouble is on Qwest's side, Eschelon will request that Qwest correct the problem prior to the due date for the hot cut. If Qwest fails to correct the problem by the due date, Eschelon will change the CFA so as not to delay the cut. Once Qwest verifies dial tone, the cut proceeds to Step 2.

Step 2: Verification of dial tone 1 hour prior to cut

A. If Qwest verifies dial tone, the cut proceeds to Step 3.

B. If Qwest fails to detect dial, Qwest calls Eschelon ("1 Hour Notice") and Eschelon conducts the following steps:

1. Verify that switch translations have been completed. If not, Eschelon builds translations. If Qwest verifies dial tone, the cut proceeds to Step 3.
2. Verify that the CFA on the FOC matches the LEN. If not, Eschelon would change the LEN in its switch. If Qwest verifies dial tone, the cut proceeds to Step 3
3. If the CFA on the FOC matches the LEN, Eschelon contacts Qwest to verify the accuracy of the 1 Hour Notice. If Qwest verifies dial tone, the cut proceeds to Step 3.
4. If there is still no dial tone, Eschelon will ask Qwest to verify that the coil is okay. A bad coil could be the reason there is no dial tone. If this does not resolve the problem, Eschelon will change the CFA under Qwest's documented process for day-of-cut CFA change so as not to delay the cut. Once Qwest verifies dial tone, the cut proceeds to Step 3.

Step 3: Qwest begins the transfer of the customer

A. Eschelon calls the Qwest tester assigned to the hot cut to authorize Qwest to start the hot cut.[1]
B. Qwest performs cut procedures.
C. When the cut is completed successfully, the hot cut process requires the Qwest tester to notify Eschelon that the cut is complete. If Qwest affirms that the cut has been completed successfully, the cut proceeds to Step 4.
D. If the Qwest tester fails to notify Eschelon that the cut has been completed in a reasonable period a time[2], Eschelon may call Qwest to obtain the status of the cut. If Qwest has simply failed to notify Eschelon of completion and Qwest states that the cut has already completed successfully, the cut proceeds to Step 4.
E. If Qwest identifies a problem (via an Eschelon call to Qwest or a Qwest call to Eschelon), Eschelon will request that Qwest identify the problem, describe how Qwest will fix the problem, and determine how long it will take for Qwest to fix the problem and complete the cut.

[1] At times Qwest will call Eschelon and ask Eschelon to start the cut early. In many cases, Eschelon will agree. Even though Eschelon has paid a higher rate for a coordinated hot cut, in these instances, Eschelon is not receiving a coordinated hot cut and is overpaying.
[2] Eschelon defines a reasonable completion time as five minutes per line. Therefore, the amount of time that passes before Eschelon will inquire varies by the number of lines in the hot cut.

F. If the identified problem is Qwest-caused, Qwest may dispatch a Qwest technician or complete central office work as appropriate. Once Qwest affirms that the cut has been completed successfully, the cut proceeds to Step 4.
G. If the identified problem is Eschelon-caused, Eschelon will change the CFA under Qwest's documented process for day-of-cut CFA change so as not to delay the cut. Once Qwest affirms that the cut has been completed successfully, the cut proceeds to Step 4.
H. If at any time during the cut process, if the impact to the end-user is too great, Eschelon will request that Qwest cut the customer back to Qwest and resolve the issue before proceeding with the cut again.

Step 4: Eschelon verifies that the cut is complete

A. Once Qwest informs Eschelon that the cut is complete, Eschelon tests each line in the Eschelon switch. This process includes a test of intra-switch calling. If no problems are identified, Qwest pulls the translations out of the Qwest switch and the cut proceeds to Step 5.
B. If problems are identified, Eschelon contacts the Qwest CLEC Coordination Center ("QCCC"). The following are examples of problems/resolutions based on what the Eschelon tester may see on the line test results:
    1. If no dial tone is present at the ICDF, Eschelon would ask that a Qwest Central Office Technician ("COT") isolate the problem. If the problem is identified on Eschelon's side of the Point of Interconnection ("POI"), a day-of-cut CFA change would be initiated as described above and the cut proceeds to Step 5.
    2. If there is dial tone at the ICDF, Eschelon would ask that a Qwest COT check for dial tone at the cable head.
        a. If there is no dial tone at the cable head, a central office wiring problem is indicated as the cause of no dial tone. Once Qwest identifies and resolves this problem, the cut proceeds to Step 5.
        b. If there is dial tone at the cable head, the problem is indicated as being caused outside the central office and a Qwest technician is dispatched. Once Qwest identifies and resolves the problem, the cut proceeds to Step 5.
        c. If Qwest finds dial tone to the customer's demarc and verifies that the circuit was reused properly, the problem may be identified as Customer Premise Equipment ("CPE"). Eschelon will attempt to resolve the problem with the end user.

Step 5: Eschelon ports the customer's number(s) to the Eschelon switch.

A. Eschelon logs into Verisign[3] and searches for the end user's number(s).
B. Eschelon verifies that each number is ready to activate and will point to the correct Eschelon Local Routing Number ("LRN").
    1. If the LRN is incorrect, Eschelon will modify the subscription[4] in Verisign.
    2. If the numbers are not ready to port because of, for example, subscription problems[5], manual authorization from Qwest's Customer Service Inquiry and Education Center ("CSIE") is needed to port the numbers. Eschelon asks Qwest to open an escalation ticket. Only when Qwest authorizes the port can Eschelon port the number.
C. Once the number is activated in Verisign, the Eschelon tester verifies that the port has completed.
    1. Eschelon will "refresh" the subscription in Verisign to ensure that the number is in "Active" status.
    2. If the status is returned as "Sending" or "Pending", the port has not yet completed. These statuses represent a "slow" port.[6] If this status continues, Eschelon will generally contact Verisign for an update within 30 minutes to an hour. If Verisign indicates that the port is slow, nothing can be done. During this time, end users will be unable to receive calls from all other carriers (i.e., all callers other than other Eschelon customers).
    3. If the status is returned as "DL Partial Fail", the port has not yet completed because another provider has not recognized the port of the number. "DL Partial Fail" status can sometimes remain for hours (or even days). No modifications to the number can be made while it is in this status. Furthermore, it is Verisign's policy to wait at least four hours before manually intervening to push the port through or re-broadcast the number.
        a. Eschelon investigates each "DL Partial Fail" to determine from which carrier(s) the end user will not be able to receive calls. This is determined by running a query in Verisign to identify which

[3] Verisign is the electronic interface that Eschelon uses to interface with the Number Portability Administration Center ("NPAC").
[4] A customer's subscription contains information on the number being ported (e.g., the name of the customer's originating carrier and the carrier to which the number is being ported.).
[5] Subscription problems include, but are not limited to, instances where Qwest has not supplied the port information to NPAC or Qwest has improperly populated the Service Profile Identifier ("SPID").
[6] One potential cause of a "slow" port would be if a large port is occurring simultaneously. This can slow down the NPAC database.

provider(s) has/have failed to recognize the port. Calls originating with these providers will not go through to the end user.

b. Receipt of "DL Partial Fail" related to a significant carrier (e.g., Qwest or a major wireless carrier) will require Eschelon to determine whether to go ahead with additional scheduled cuts because it is known that any other hot cuts initiated likely will result in additional end users not being able to receive calls from the affected carrier. As pushing-out a cut at the last minute can often result in loss of service, either choice is risky.

Step 6: Eschelon tests the customer's service after porting is completed

A. Once the numbers have been successfully ported to Eschelon's switch, Eschelon tests the end user's service by placing test calls to the customer to determine things like whether:

1. Calls are terminating to the correct customer equipment.
2. The customer is able to dial long distance.
3. All features are programmed and operable.
4. The customer is able to send and receive faxes.
5. The customer can run a credit card transaction (when applicable).
6. The customer's alarm service is able to call (when applicable).

B. If problems are identified as a result of these test calls, Eschelon will generally follow the trouble shooting scenarios described in Step 4 above.

Step 7: Eschelon closes the conversion with Qwest

Once Eschelon has successfully completed testing with its end user, the hot cut is accepted. Eschelon accepts the hot cut by calling the Qwest tester and requesting that the tester close the conversion.