

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition for Arbitration of an
Interconnection Agreement Between DIECA
COMMUNICATIONS, INC., d/b/a COVAD
COMMUNICATIONS COMPANY with QWEST
CORPORATION Pursuant to 47 U.S.C. Section
252(b), and the *Triennial Review Order*

DOCKET NO. UT-043045

**DIRECT TESTIMONY
OF RENÉE ALBERSHEIM
QWEST CORPORATION
DISPUTED ISSUES: 6 (Single LSR)
JULY 15, 2004**

REDACTED VERSION

**REDACTED VERSION
CONFIDENTIAL PER PROTECTIVE ORDER IN
WUTC DOCKET NO. UT-043045**

CONTENTS

I.	IDENTIFICATION OF WITNESS	1
II.	PURPOSE OF TESTIMONY	2
IV.	ISSUE NO. 6: LINE SPLITTING, LOOP SPLITTING AND SINGLE LSR	5
V.	SINGLE-LSR ORDERING AND THE CMP	13
VI.	CONCLUSION	19

1 **I. IDENTIFICATION OF WITNESS**

2 **Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION**
3 **WITH QWEST CORPORATION.**

4 A. My name is Renée Albersheim. I am employed by Qwest Corporation (“Qwest”),
5 as a Staff Advocate. My business address is 1801 California Street, 24th floor,
6 Denver, CO, 80202.

7
8 **Q. PLEASE DESCRIBE YOUR EDUCATION BACKGROUND AND**
9 **EMPLOYMENT EXPERIENCE.**

10 A. I have been working in the Global Wholesale Markets organization since
11 December, 2003. Before December I worked in the Information Technologies
12 Wholesale Systems organization since joining Qwest in October 1999. As a Staff
13 Advocate, I provide support for Qwest's response to regulatory issues with respect
14 to the 1996 Act, FCC orders, state commission decisions, and other legal and
15 regulatory matters.

16
17 Prior to becoming a Qwest employee, I worked for 15 years as a consultant on
18 many systems development projects and in a variety of roles including the
19 following: programmer and systems developer, systems architect, project
20 manager, information center manager and software training consultant. I worked
21 on projects in a number of industries including: oil and gas; electric, water and
22 telephone utilities; insurance; fast food; computer hardware; and the military. I
23 designed and developed a number of applications including electronic interfaces
24 like those described later in this testimony. During that time, I worked on several

1 of Qwest's OSS as a consultant on Human Resources and Interconnect Access
2 Billing Systems ("IABS") projects.

3
4 In addition to working full-time at Qwest, I recently completed course work at the
5 University of Denver College of Law, where I earned a Juris Doctor degree. I
6 passed the Colorado Bar Examination in October of 2001. I received a Master of
7 Business Administration in Management Information Systems from the
8 University of Colorado College of Business and Administration in 1985 and I
9 received a Bachelor of Arts degree from the University of Colorado in 1983.

10
11 **II. PURPOSE OF TESTIMONY**

12 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

13 A. The purpose of my testimony is to address the parties' dispute identified as
14 Disputed Issue 6: Single Local Service Request ("LSR") processing for Line
15 Splitting and Loop Splitting.

16
17 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

18 A. This issue concerns a proposed change to Qwest's systems, which serve all
19 CLECs. Qwest already provides or has system changes in progress to allow
20 Covad to place line splitting or loop splitting orders on a single LSR.
21 Accordingly, as Covad has conceded in arbitration proceedings in Colorado,
22 much of this dispute has been resolved by the system changes that are already in
23 place. The remainder of this dispute will be mooted with the system changes that
24 are now in progress and scheduled to be implemented in October 2004. The

1 system changes at issue affect the entire CLEC community, Qwest's available
2 resources to serve the entire CLEC community, and have been and are currently
3 being managed through the Change Management Process ("CMP"). There is no
4 reason to upset and supplant the carefully-managed and timed work of the CMP –
5 which reflects the priorities and needs of all CLECs – with unilateral contract
6 language reflecting Covad's view that the remaining systems change must be
7 accomplished on Covad's schedule and/or Qwest must somehow make line
8 splitting and loop splitting available on a single LSR through manual processing.

9
10 As I set forth in detail below, there are a number of problems with Covad's
11 proposed language. First, Covad-specific demands and timing incorporated in an
12 interconnection agreement would trivialize the CMP and render much of its work
13 meaningless. If, as Covad proposes to do here, Covad may insert in its
14 interconnection agreement system requirements that place Covad's issue ahead of
15 where it is currently being addressed in CMP, other CLECs will have similar
16 incentive to demand interconnection agreement language regarding Qwest's
17 systems specific to their view of a system issue's priority and timing, irrespective
18 of how the CMP is addressing the same issue. The resulting conflict between
19 individual CLEC demands incorporated in interconnection agreements and CLEC
20 community interests in implementation of prioritized systems changes would
21 undermine the CMP. Second, part of the system changes Covad desires has
22 already been accomplished through CMP: Covad currently has the ability to
23 order line splitting and loop splitting for new connections. The remainder of
24 Covad's request (single LSR ordering for conversions) has also been addressed in

1 CMP and is scheduled to be implemented with other systems changes in October
2 in Interconnection Mediated Access (“IMA”) Release 16.0. Third, *Qwest*
3 *initiated* within CMP the automated systems changes to provide the single LSR
4 ordering capability that Covad seeks. There is no basis for any suggestion by
5 Covad that Qwest is not committed to the changes at issue. For all of these
6 reasons, the Commission should reject Covad's attempt to force systems changes
7 through proposed contract language.

8
9 **Q. TO PUT THIS DISPUTE IN CONTEXT, WHAT PRODUCTS ARE AT**
10 **ISSUE HERE?**

11 A. Only two products are at issue. They are line splitting and loop splitting.

12
13 **Q. PLEASE COMMENT ON THE DEMAND FOR THE LINE SPLITTING**
14 **AND LOOP SPLITTING PRODUCTS IN QWEST'S LOCAL SERVICE**
15 **REGION.**

16 A. In March of 2003 there were 155 total line-split lines in service region-wide.
17 There were no loop-split lines in service region-wide. In March of 2004, there
18 were 2,906 total line-split lines in service region-wide. There was one loop-split
19 line in service region-wide.

20
21 **Q.** 

22
23 **A.** 

1 *provisioning* of the products remains the same.

2
3 **Q. SO IS THERE AN ISSUE HERE ABOUT THE PROVISIONING OF LINE**
4 **SPLITTING OR LOOP SPLITTING?**

5 A. No. The provisioning of these products is not affected by the use of two LSRs
6 back-to-back or the use of a single LSR. To the extent Covad suggests there are
7 provisioning delays caused by the two LSR process, Covad is incorrect.

8
9 **Q. UNTIL THE REMAINDER OF THE SINGLE LSR ORDER PROCESS IS**
10 **IMPLEMENTED IN IMA RELEASE 16.0 SCHEDULED FOR OCTOBER,**
11 **IS COVAD AT A COMPETITIVE DISADVANTAGE?**

12 A. No it is not. Covad has incorrectly claimed that for conversion orders today (and
13 for new connections or transfers prior to release 15.0), the order for voice service on
14 the first LSR has to be provisioned before the second LSR for data service may be
15 submitted. That is incorrect. Since August of 2003, Covad has had the ability to
16 submit the two LSRs one right after the other. There is no requirement that the
17 voice LSR be provisioned before the data LSR can be submitted. All that is
18 required is that the voice LSR be submitted first. The data LSR may be submitted
19 immediately following the voice LSR, and can be provisioned at the same time as
20 the voice request. [REDACTED]

21 [REDACTED]
22 [REDACTED] Covad is simply wrong in asserting in its Petition for Arbitration that
23 the two-order process delays the provisioning of service to Covad's customers.

1 **Q. WHAT IS QWEST'S PROPOSED LANGUAGE FOR SECTION 9.21.1?**

2 A. Qwest's proposed language for section 9.21.1 is as follows:

3
4 9.21.1 Line Splitting provides CLEC/DLEC with the opportunity to offer
5 advanced data service simultaneously with an existing UNE-P by using the
6 frequency range above the voice band on the copper portion of a Loop. By
7 defining "Line Splitting" as the provision of advanced data service
8 simultaneous with an existing UNE-P, this Agreement in no way precludes
9 CLEC from partnering with another CLEC in order to provide advanced data
10 service simultaneous with an existing UNE-P. The CLEC/DLEC may offer
11 advanced data service simultaneous with a new UNE-P order, on the same
12 LSR, when that capability becomes available through an IMA release. The
13 advanced data service may be provided by the Customer of record or another
14 data service provider chosen by the Customer of record. A POTS Splitter
15 must be inserted into the UNE-P to accommodate establishment of the
16 advanced data service. The POTS Splitter separates the voice and data traffic
17 and allows the copper portion of the Loop to be used for simultaneous DLEC
18 data transmission and CLEC provided voice service to the end user. "CLEC"
19 will herein be referred to as the voice service provider while "DLEC" will be
20 referred to as the advanced data service provider. CLEC and DLEC may be
21 the same entity. Only one (1) Customer of record determined by the
22 CLEC/DLEC partnership will be identified to Qwest.

23

24 **Q. WHAT LANGUAGE DOES COVAD PROPOSE FOR SECTION 9.21.1?**

25 A. Covad's proposed changes to section 9.21.1 are underlined below:

26
27 9.21.1 Line Splitting provides CLEC/DLEC with the opportunity to offer
28 advanced data service simultaneously with an a new or existing UNE-P by
29 using the frequency range above the voice band on the copper portion of a
30 Loop. The advanced data service may be provided by the Customer of record
31 or another data service provider chosen by the Customer of record. A POTS
32 Splitter must be inserted into the UNE-P to accommodate establishment of the
33 advanced data service. The POTS Splitter separates the voice and data traffic
34 and allows the copper portion of the Loop to be used for simultaneous DLEC
35 data transmission and CLEC provided voice service to the end user. "CLEC"
36 will herein be referred to as the voice service provider while "DLEC" will be
37 referred to as the advanced data service provider. CLEC and DLEC may be
38 the same entity. Only one (1) Customer of record determined by the
39 CLEC/DLEC partnership will be identified to Qwest.

1

2 **Q. WHAT IS QWEST'S PROPOSED LANGUAGE FOR SECTION 9.21.4.1.6?**

3 A. Qwest's proposed language for section 9.21.4.1.6 is as follows:

4

5 9.21.4.1.6 The Customer of record shall submit the appropriate LSRs
6 associated with establishing UNE-P and Line Splitting. Customer of record
7 may offer advanced data service simultaneous with a new UNE-P order, on
8 the same LSR, when that capability becomes available through an IMA
9 release.

10

11 **Q. WHAT LANGUAGE DOES COVAD PROPOSE FOR SECTION 9.21.4.1.6?**

12 A. Covad proposes changing the last sentence of section 9.21.4.1.6. This sentence is
13 shown below underlined.

14

15 9.21.4.1.6 The Customer of record shall submit the appropriate LSRs
16 associated with establishing UNE-P and Line Splitting. A single LSR may be
17 used to establish both the UNE-P and Line Splitting service at the same time.

18

19 **Q. WHAT IS QWEST'S PROPOSED LANGUAGE FOR SECTION 9.24.1?**

20 A. Qwest's proposed language for section 9.24.1 is as follows:

21

22 9.24.1 Loop Splitting provides CLEC/DLEC with the opportunity to offer
23 advanced data service simultaneously with voice over an existing Unbundled
24 Loop by using the frequency range above the voice band on the copper
25 portion of a Loop. By defining "Loop Splitting" as the provision of advanced
26 data service simultaneous with an existing Unbundled Loop, this Agreement
27 in no way precludes CLEC from partnering with another CLEC in order to
28 provide advanced data service simultaneous with an existing unbundled loop.
29 The CLEC/DLEC may offer advanced data service simultaneous with a new
30 unbundled loop order, on the same LSR, when that capability becomes
31 available through an IMA release. The advanced data service may be
32 provided by the Customer of record or another data service provider chosen
33 by the Customer of record. The POTS Splitter separates the voice and data
34 traffic and allows the copper portion of the Loop to be used for simultaneous
35 DLEC data transmission and CLEC provided voice service to the end user.

1 "CLEC" will herein be referred to as the voice service provider while "DLEC"
2 will be referred to as the advanced data service provider. CLEC and DLEC
3 may be the same entity. Only one (1) Customer of record determined by the
4 CLEC/DLEC partnership will be identified to Qwest.

5
6 **Q. WHAT LANGUAGE DOES COVAD PROPOSE FOR SECTION 9.24.1?**

7 A. Covad's proposed changes to section 9.24.1 are underlined below:

8
9 9.24.1 Loop Splitting provides CLEC/DLEC with the opportunity to offer
10 advanced data service simultaneously with voice over an a new or existing
11 Unbundled Loop by using the frequency range above the voice band on the
12 copper portion of a Loop. The advanced data service may be provided by the
13 Customer of record or another data service provider chosen by the Customer
14 of record. The POTS Splitter separates the voice and data traffic and allows
15 the copper portion of the Loop to be used for simultaneous DLEC data
16 transmission and CLEC provided voice service to the end user. "CLEC" will
17 herein be referred to as the voice service provider while "DLEC" will be
18 referred to as the advanced data service provider. CLEC and DLEC may be
19 the same entity. Only one (1) Customer of record determined by the
20 CLEC/DLEC partnership will be identified to Qwest.

21
22 **Q. WHAT IS THE PRACTICAL EFFECT OF THE DIFFERENCES BETWEEN**
23 **THE LANGUAGE PROPOSED BY QWEST AND THE LANGUAGE**
24 **PROPOSED BY COVAD?**

25 A. The changes Covad proposes to sections 9.21.1., 9.21.4.1.6 and 9.24.1 all require
26 that a single-LSR ordering capability (as described below) exist at the time this
27 agreement takes effect.

28
29 **Q. IS THERE ANY SUBSTANTIVE ISSUE BETWEEN QWEST AND COVAD**
30 **REGARDING SINGLE LSR ORDERING?**

31 A. No. Qwest has already committed to implementing a single LSR ordering capability
32 in the IMA ordering system. Basically, the IMA is an electronic ordering system that

1 allows CLECs to submit LSRs to Qwest through an automated process as opposed to
2 a manual process.

3
4 There is no dispute between the parties about changing the ordering process to enable
5 the orders to be submitted on one LSR. Indeed Qwest, not Covad, initiated the
6 Change Requests ("CRs") in the CMP to bring about this change in ordering. Instead
7 the dispute centers on the timing of the process changes necessary to implement
8 single LSR ordering. Qwest has already made the single LSR ordering process
9 available for line splitting/loop splitting for new connections and transfers.

10
11 There is no dispute that the single LSR process for conversions and migrations is
12 scheduled to be implemented with IMA Release 16.0 in October. Covad's claim that
13 contract language is appropriate to ensure that Qwest will in fact implement the
14 remaining process change is misplaced as is Covad's claim that process changes
15 should be mandated in contract language.

16
17 **Q. WHAT IS MEANT BY "A SINGLE LSR ORDERING CAPABILITY?"**

18 A. At the time Qwest and Covad began negotiating this agreement, requests for voice
19 and data services relating to line-splitting and loop-splitting had to be placed via
20 separate LSRs in IMA. That is, first an LSR had to be submitted for the voice
21 service, whether for a new connect or transfer or a product conversion or migration.¹

¹ A new connect is the creation of new service. A transfer, also known as an outside move, occurs when service is moved from one address to another. By contrast, a conversion order changes an existing Qwest account or a wholesale account to or from a wholesale account as specified (Activity Type V), or converts an existing Qwest account or a wholesale account to a wholesale account as specified with no listing changes (Activity Type Z). The terms migration

1 Then a second LSR could be submitted for associated data service (line-splitting for
2 UNE-P or loop-splitting for unbundled loops). The two LSRs could be linked via the
3 entry of the related purchase order number (PON) in the related PON (RPON) field
4 on the LSR. The second LSR could also be submitted immediately following the first
5 LSR. In other words, contrary to Covad's claim, it was not necessary to wait for the
6 first LSR to complete before the second could be submitted. Even so, Qwest
7 recognized the utility of being able to request both the voice and data service on a
8 single LSR. Therefore, on its own initiative, Qwest submitted change requests to the
9 CMP to implement this capability. It is only the timing of Qwest's implementation of
10 this capability that is at issue here. In fact, the single LSR capability for new
11 connections and transfers was implemented in April, making a large portion of
12 Covad's concerns moot.

13
14 **Q. WHAT TECHNICAL CHANGE MADE IT POSSIBLE TO SUBMIT TWO**
15 **LSRS IN IMMEDIATE SEQUENCE, AND MADE THE SINGLE LSR**
16 **PROCESS POSSIBLE?**

17 A. Qwest made a change to its back office systems to address an issue specifically
18 related to new connections and transfers for customers that also wanted data service.
19 To be able to order data service, a loop must first be pre-qualified to provide this
20 service. In the past, the loop qualification could only be performed on a Telephone
21 Number ("TN"). This posed a problem for new connections, as a TN was not
22 assigned to the loop until the account was established. With this back office system
23 change instituted in August 2003, it became possible to qualify a loop based on its

and conversion are used interchangeably by Qwest. Both refer to a change of service provider.

1 circuit identification. This allowed for simultaneous ordering of new connections and
2 transfers for voice and data service for qualified loops. This allowed for two LSRs to
3 be submitted in immediate sequence, and it allowed for the subsequent development
4 of the single LSR process for new connections and transfers.
5

6 **Q. COVAD'S PETITION CLAIMS THAT THE TWO LSR ORDERING**
7 **PROCESS CREATES A DELAY IN THE PROVISIONING OF DSL**
8 **SERVICE. IS COVAD CORRECT?**

9 A. No. Covad is not correct. As I set forth above, since August of 2003, Covad has
10 had the ability to submit the two LSRs one right after the other. As discussed in
11 CMP meetings introducing the first CR in March 2003, there is no requirement that
12 the voice LSR be provisioned before the data LSR can be submitted. All that is
13 required is that the voice LSR be submitted first. The data LSR may be submitted
14 immediately following the voice LSR, and can be provisioned at the same time as
15 the voice request.
16

17 **Q. GIVEN THAT WITH A TWO-LSR PROCESS, THE TWO LSRS MAY BE**
18 **SUBMITTED ONE IMMEDIATELY AFTER THE OTHER, WHAT IS THE**
19 **PRACTICAL EFFECT OF IMPLEMENTING THE SINGLE LSR PROCESS?**

20 A. Single LSR ordering will save some of the time Covad would spend placing orders.
21 Covad would type one LSR instead of two, and it would have fewer screens to
22 navigate to type the order for the two products. Again, this is an ordering change.
23 Qwest's provisioning of these products is not affected by this ordering change. And
24 as of IMA Release 15.0, orders for new connections and transfers may be submitted

1 on a single LSR.
2

3 **V. SINGLE-LSR ORDERING AND THE CMP**

4
5 **Q. WHY HAS QWEST MANAGED THE SYSTEMS CHANGES FOR**
6 **SINGLE-LSR ORDERING THROUGH THE CMP?**

7 A. CMP is the appropriate forum through which to process the systems changes to
8 implement a single LSR ordering capability. Importantly, the systems development
9 work involved in accommodating these changes to Qwest's ordering systems affects
10 all CLECs, not only Covad, and therefore the system changes to implement single
11 LSR ordering are required to be processed through CMP. The Wholesale Change
12 Management Document, a consensus document designed by Qwest and CLECs,
13 mandates that "[a] CLEC or Qwest seeking to change an existing OSS Interface, to
14 establish a new OSS Interface, or retire an existing OSS Interface *must* submit a
15 Change Request (CR)."² Since the creation of a single LSR ordering process requires
16 changes to an existing OSS Interface, CMP is the appropriate and required forum for
17 addressing such changes.

18
19 CMP was established for the specific purpose of ensuring that system and process
20 changes are clearly communicated to CLECs. It allows all CLECs to participate in
21 Change Request (CR) clarification and solution design meetings. CMP further
22 provides detailed tracking of each CR through to final disposition, so that any

² Qwest Wholesale Change Management Process Document, which is publicly available at <http://www.qwest.com/wholesale/cmp/whatiscmp.html>, p. 24 (emphasis added).

1 interested party can track the status of any particular CR.

2
3 Further, the CMP allows all CLECs to learn about and anticipate the impacts a
4 change may have on their operations, and to voice concerns and request changes to
5 mitigate adverse impacts associated with a change. CMP was created to allow such
6 CLECs to voice their concerns and work toward an equitable solution that better
7 meets the larger community's needs. Indeed, Covad was among the CLECs that
8 participated with Qwest in designing the CMP and that have accepted it as the
9 mechanism for changing systems that affect multiple CLECs. The CMP process
10 provides an established forum and, more importantly, existing procedures designed to
11 ensure that the needs of the broader CLEC community are addressed. Accordingly,
12 the single LSR ordering issue is properly addressed in the CMP forum.

13
14 **Q. WHAT IS THE STATUS OF THE SINGLE LSR ORDERING CAPABILITY?**

15 A. Qwest, not Covad, submitted two CRs to the CMP. The first, SCR030603-01EXSC,
16 creates the single LSR ordering capability for new connections or transfer orders
17 (Activity types N and T).³ This CR allows the customer of record, whether that is the
18 voice provider or the data provider, to include in an order for a new unbundled loop
19 or UNE-P, a request for data service on the same LSR. The second CR, SCR120303-
20 01, will allow the customer of record to include in an order for a conversion from
21 retail or another product (Activity types Z and V) a request for data service on the
22 same LSR.

23

³ See Exhibit RA-2 for a copy of change request SCR030603-01EXSC.

1 **Q. HAS THIS FIRST CR CREATING THE SINGLE-LSR ORDERING**
2 **CAPABILITY FOR NEW CONNECTIONS BEEN COMPLETED?**

3 A. Yes it has. It was completed in April 2004 with IMA Release 15.0 and all CLECs
4 may now order line splitting and loop splitting on a single LSR for new connections
5 or transfers.

6
7 **Q. DID QWEST MAKE AN EARLIER ATTEMPT TO PROVIDE A SINGLE**
8 **LSR CAPABILITY?**

9 A. Yes. Qwest had intended to include the single LSR capability for ordering line
10 splitting or loop splitting with new connects and transfers for UNE-P or unbundled
11 loops in IMA Release 13.0. During development of the release, Qwest determined
12 that creating the single LSR capability for line splitting and loop splitting was much
13 more complex than originally thought. Qwest underestimated the complexity of the
14 system enhancements required to combine the products (UNE-P with line splitting
15 and unbundled loop with loop splitting) and this underestimate affected the
16 implementation schedule. During the testing of the IMA 13.0 Release, Qwest
17 determined that it was necessary to create new REQTYPE codes and Product
18 Identifications in IMA to make these product offerings. Because these changes
19 required significant modifications to the Local Service Ordering Guide (“LSOG”),
20 it was necessary to include them in a major IMA release. This work was projected
21 to take over 10,000 man hours of additional work at an additional cost to Qwest of
22 over \$500,000. Once these complexities were recognized, Qwest determined that it
23 was not possible to complete the changes in time for IMA Release 13.0. At that
24 time, IMA Release 14.0 was already closed to new changes, so the single LSR

1 capability for new connections for line splitting and loop splitting was added to
2 IMA Release 15.0.

3

4 **Q. ARE DELAYS OF IMA CRS COMMON?**

5 A. No. The delay of the line/loop splitting portion of this CR was an aberration.

6

7 **Q. WERE RESOURCES TAKEN FROM OTHER CLEC-SPONSORED CRS IN**
8 **ORDER TO INCLUDE THE FUNCTIONALITY IN IMA RELEASE 15.0?**

9 A. No. Qwest used internal resources to complete this CR, and all resources previously
10 allocated for CMP-prioritized CRs were left intact for IMA Release 15.0.

11

12 **Q. HAS QWEST ADDRESSED THE ISSUE OF A SINGLE LSR FOR**
13 **CONVERSIONS?**

14 A. Yes. Qwest issued an additional CR, SCR120303-01. This CR will allow the
15 customer of record to submit an LSR for a conversion to UNE-P or Unbundled loop
16 to include a request for line-splitting or loop-splitting.⁴ This CR is targeted for
17 implementation with IMA Release 16.0 in October.

18

19 **Q. WAS A SEPARATE CR FOR CONVERSIONS NECESSARY?**

⁴ See Exhibit RA-3 for a copy of change request SCR120303-01. As set forth in the CR, the products which can be converted include: Line Splitting UNE-P POTS, Line Splitting-UNE-P PBX Designed Trunks, Line Splitting UNE-P Centrex 21, Line Splitting UNE-STAR, Line Splitting UNE-STAR Centrex 21, Loop Splitting - UBL. Conversion Activity will be allowed to and from listed products including Conversion from Retail to New UNE-P with Line Splitting with or without Number Port, Line Splitting to new UBL with Loop Splitting with or without Number Port, and Unbundled Analog Loop (LX--) to Unbundled Non-Loaded Loop (LX-N) with Loop Splitting.

1 A. Yes. Qwest determined that the ability to submit orders on a single LSR was also
2 going to be needed for conversion orders. So on its own initiative, Qwest submitted
3 the second CR.⁵
4

5 **Q. WHAT IS THE STATUS OF THIS SECOND CR?**

6 A. This CR is to be implemented with IMA Release 16.0 in October 2004.
7

8 **Q. IS QWEST LIKELY TO ENCOUNTER THE SAME TECHNICAL**
9 **DIFFICULTIES WITH THE CR FOR CONVERSION ORDERS THAT IT**
10 **EXPERIENCED WITH THE CR FOR NEW CONNECTIONS?**

11 A. No. The CR for conversions (SCR030603-01EXSC) builds on the solution
12 implemented with IMA Release 15.0 for new connections. As Qwest has figured
13 out how to combine the products, the second CR (SCR120303-02) adds to the
14 activities that can be performed with these product combinations.
15

16 **Q. COVAD CLAIMS THAT AN IMA CHANGE IS NOT NECESSARY TO**
17 **IMPLEMENT SINGLE LSR PROCESSING, BECAUSE COVAD CLAIMS**
18 **SINGLE LSR PROCESSING CAN BE DONE MANUALLY. WHAT IS YOUR**
19 **RESPONSE?**

20 A. An IMA change might not be required were Covad willing to accept manual
21 handling of such orders, but a process change would certainly be required. And
22 such a process change would have to go through CMP. Qwest processes, prior to

⁵ On the same day that Qwest submitted its second CR, MCI submitted a CR seeking single LSR processing for line splitting (SCR120303-02). Once MCI understood that its request was a subset of Qwest's second CR, MCI withdrew its CR.

1 IMA Release 15.0, did not permit a single LSR to contain an order for an
2 unbundled loop and loop splitting, or for UNE-P and line splitting, even if such an
3 LSR were to be processed manually.

4
5 Neither Covad nor any other CLEC has asked Qwest to consider an interim process
6 through the CMP. The first indication to Qwest that Covad wanted an interim fax
7 process was in the parties' negotiations that preceded Covad's arbitration petition.

8
9 **Q. WOULD IT MAKE SENSE FOR COVAD TO SUBMIT A CR TODAY FOR A**
10 **MANUAL PROCESS FOR SUBMITTING A SINGLE LSR FOR LINE/LOOP**
11 **SPLITTING?**

12 A. No. As I stated above, the first Qwest-sponsored CR for an automated process for a
13 single LSR for new connects and transfers was implemented with IMA Release 15.0
14 in April. And the second Qwest-sponsored CR for an automated process for a single
15 LSR for conversions is included in IMA Release 16.0 to be implemented in October.
16 It makes no sense to institute a process change through the CMP for a manual process
17 that no CLEC has requested, would only be necessary for conversions, and would
18 only be needed for a few months. And given that the current two-LSR process is
19 electronic, a slower, manual process makes even less sense.

20
21 **Q. HAVE ANY SINGLE LSR ORDERS BEEN PLACED SINCE IMA RELEASE**
22 **15.0 WAS INSTALLED IN APRIL?**

23 A. There has been one order for UNE-P with line splitting using the single LSR process
24 that was implemented with IMA Release 15.0. There have been no orders for loop

1 splitting using the single LSR process that was implemented with IMA Release 15.0.

2
3 **Q.**

4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8
9 **Q. WHAT DOES THIS SUGGEST TO YOU?**

10 A. This suggests to me that Covad's assertions concerning its need for single LSR
11 ordering are overstated. Covad's assertions that contract language must require single
12 LSR ordering to accommodate Covad's needs are belied by the fact that [REDACTED]
13 [REDACTED]

14
15 **VI. CONCLUSION**

16
17 **Q. IS CONTRACT LANGUAGE THE APPROPRIATE PLACE TO ADDRESS**
18 **THE IMA CHANGES COVAD DESIRES FROM QWEST?**

19 A. No. Changes to IMA impact all who use this ordering system. It is not appropriate
20 for changes to Qwest's systems to be mandated by the terms of one CLEC's contract
21 with Qwest. The CMP was established so that all CLECs could determine how best
22 to prioritize changes to IMA, so that Qwest resources can be allocated to the benefit
23 of all CLECs. If a change is contractually mandated, Qwest has no choice but to
24 make the change, diverting resources that would otherwise be available to the

1 greater CLEC community. It is the goal of the CMP to ensure that all CLECs have
2 a say in how Qwest's resources should best be used. Individual contract provisions
3 mandating systems changes subvert the purpose of the CMP, and give an individual
4 CLEC the ability to undermine CMP and obtain changes for its own benefit that
5 may conflict with priorities established in CMP.
6

7 **Q. DOES COVAD NEED THE LANGUAGE CHANGES IT PROPOSES IN THIS**
8 **CONTRACT?**

9 A. No. The first CR, which was sponsored by Qwest, not Covad, giving CLECs the
10 ability to send new connect orders for UNE-P with Line Splitting or Unbundled Loop
11 with Loop Splitting on a single LSR, was successfully implemented with release 15.0
12 of IMA on April 19, 2004. The second CR, also sponsored by Qwest, creating the
13 same capability for conversion orders, is scheduled to be implemented with IMA
14 Release 16.0 in October 2004. Covad does not need to have language in its
15 interconnection agreement requiring Qwest to take actions that Qwest has already
16 voluntarily taken through the CMP. As the two CRs at issue here demonstrate, Qwest
17 is motivated to work through the CMP to make IMA changes as prioritized by the
18 CLEC community.
19

20 **Q. WHY SHOULD THE COMMISSION ADOPT QWEST'S PROPOSED**
21 **LANGUAGE FOR SECTIONS 9.21.1, 9.21.4.1.6 AND 9.24.1?**

22 A. Qwest's language provides the systems functionality that Covad requires. The
23 functionality has been properly handled through CMP to date, with part of Covad's
24 request already accommodated. The remaining functionality is scheduled to be
25 provided and should remain subject to CMP, not subject to contract language.

1 Covad should not be allowed to set a precedent that subverts the CMP process nor
2 should changes to Qwest's systems be mandated through contract language.

3

4 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

5 A. Yes, it does.



LOCAL PHONE SERVICE INTERNET/DSL WIRELESS LONG DISTANCE TV SERVICES
 CUSTOMER SERVICE SEARCH

HOME RESIDENTIAL SMALL BUSINESS LARGE BUSINESS PARTNERS WHOLESALE

Products & Services Resources Operation Support Systems Network Training, Notices & Forums Customer Service

Wholesale

[CONTACT US](#)

Resources

Change Management Process (CMP)

CMP

Open System CR SCR030603-01EXSC Detail

- ▶ [CMP Home](#)
- ▶ [CMP Document](#)
- ▶ [Team Meetings](#)
 - ▶ [Archive](#)
- ▶ [Change Requests \(CRs\)](#)
 - ▶ [Archive](#)
- ▶ [CMP Redesign](#)
 - ▶ [Archive](#)
- ▶ [Document Review](#)
 - ▶ [Product/Process Archive & Responses](#)
 - ▶ [System Archive & Responses](#)
- ▶ [CMP Oversight Committee](#)
- ▶ [Escalations/Disputes](#)
 - ▶ [Initiation](#)
 - ▶ [Ongoing Escalations](#)
 - ▶ [Archive](#)
- ▶ [OSS Hours of Availability](#)
- ▶ [CMP Points Of Contact \(POCs\)](#)
- ▶ [Customer Notification Letter Archive](#)
- ▶ [CMP Calendars](#)
- ▶ [OSS Interface Releases](#)
- ▶ [Team Meetings](#)
- ▶ [Other System Links](#)

Title: Add Qwest DSL Loop Qual by Address and Enable Single LSR For New Voic Service & DSL Installation.

CR Number	Current Status Date	Level of Effort	Interface/ Release No.	Area Impacted	Product Impact
SCR030603-01EXSC	CLEC Test 4/19/2004	17000 - 18000	IMA Common/15.0	Pre- Ordering, Order	UNE-P with Qwest DSL, Resale Qwest DSL, Lin Sharing Splitting Loop Splitting POTS (voice)

Originator: Soderlund, Crystal
Originator Company Name: Qwest Communications
Owner: Winston, Connie
Director: Winston, Connie
CR PM: Esquibel-Reed, Peggy

Description Of Change

This CR is to enable the following:

- 1) Qualification of Loop without established telephone number utilizing address search for Resale Qwest DSL and UNE-P with Qwest DSL. This change is for the Pre-Ordering function.
- 2) The ability to submit a single LSR (N&T orders) for DSL and voice services. Products include Resale Qwest DSL, UNE-P with Qwest DSL, Line Sharing, Line Splitting, and Loop Splitting. This change is for the Ordering function.

Qwest is seeking an Exception to the CMP. The Qwest Wholesale CMP Document, in Section 10.4, states: "The SCR may be requested up to five (5) calendar days after prioritization results are posted." Qwest is seeking

CMP

- ▶ **CMP Home**
- ▶ **CMP Document**
- ▶ **Team Meetings**
 - ▶ **Archive**
- ▶ **Change Requests (CRs)**
 - ▶ **Archive**
- ▶ **CMP Redesign**
 - ▶ **Archive**
- ▶ **Document Review**
 - ▶ **Product/Process Archive & Responses**
 - ▶ **System Archive & Responses**
- ▶ **CMP Oversight Committee**
- ▶ **Escalations/Disputes**
 - ▶ **Initiation**
 - ▶ **Ongoing Escalations**
 - ▶ **Archive**
- ▶ **OSS Hours of Availability**
- ▶ **CMP Points Of Contact (POCs)**
- ▶ **Customer Notification Letter Archive**
- ▶ **CMP Calendars**
- ▶ **OSS Interface Releases**
- ▶ **Team Meetings**
- ▶ **Other System Links**

an exception to this language and wants to invoke the SCRP for this CR.

Expected Deliverable:

IMA 13.0, August 4, 2003

Status History

Date	Action	Description
3/6/2003	CR Submitted	
3/7/2003	CR Acknowledged	
3/7/2003	Communicator Issued	CMPR.03.07.03.F.01439.ExcepReqPreMtg
3/11/2003	CLEC Call	Exception Pre-Meeting held. See Project Meetings Section for meeting notes.
3/11/2003	Communicator Issued	CMPR.03.11.03.F.01443.ExcepPreMtgResVoteInst
3/13/2003	Communicator Issued	CMPR.03.13.03.F.01445.VoteInstrctPotLateAd
3/21/2003	Communicator Issued	CMPR.03.21.03.F.01448.ExcepReqVoteDis
3/20/2003	Discussed at Monthly CMP Meeting	SCR030603-01EXSC discussed at March Systems CMP Monthly meeting; please see Systems CMP Distribution Package March CMP.
4/17/2003	Discussed at Monthly CMP Meeting	SCR030603-01EXSC discussed at April Systems CMP Monthly meeting; please see April Systems CMP Distribution Package, Attachments C and P.
7/17/2003	Discussed at Monthly CMP Meeting	Discussed at July Systems CMP Monthly Meeting; please see July Systems CMP Distribution Package -- Attachment L
8/21/2003	Discussed at Monthly CMP Meeting	Discussed at the August Systems CMP Monthly Meeting; please see August Systems CMP Distribution Package, Attachment I
11/20/2003	Discussed at Monthly CMP Meeting	Discussed at the November Systems CMP Monthly Meeting; please see November Systems CMP Distribution Package, Walk On Section.
2/19/2004	Discussed at Monthly CMP Meeting	Discussed at the February Systems CMP Monthly Meeting; please see the February Systems CMP Distribution Package, Attachments H & J
2/17/2004	Qwest CR Review Meeting	IMA 15.0 Hi-Level Walk Thru Held
4/19/2004	Status Changed	Status Changed to CLEC Test due to the Deployment of the IMA 15.0 Release
4/22/2004	Discussed at Monthly CMP Meeting	Discussed at the April Systems CMP Monthly Meeting; please see April Systems CMP Distribution Package, Attachment G
3/18/2004	Discussed at Monthly CMP Meeting	Discussed at the March Systems CMP Monthly Meeting; please see March Systems CMP Distribution Package, Attachment K

Project Meetings

April 22, 2004 Systems CMP Meeting Discussion: Connie Winston/Qwest stated that this CR just deployed with the IMA 15.0 Release and will

remain open for another month. There were no questions or comments. This CR remains in CLEC Test.

- March 18, 2004 Systems CMP Meeting Discussion: Connie Winston/Qwest stated that this CR is deploying on April 19, 2004, in the IMA 15.0 Release. There were no questions or comments.

-- February 19, 2004 Systems CMP Meeting Discussion Excerpt (Attachments H & J): Judy Schultz/Qwest stated that she wanted to provide an update to the funding approval process that was discussed in the January CMP Systems Meeting. Judy referred everyone to Attachment J in the Distribution Package. She stated that all CRs are being re-evaluated and must be approved. Judy said that CRs could not be scheduled without approval. Judy stated that the CRs with an impact to the IMA interface would follow the existing prioritization process. Judy noted that the funding for IMA 15.0 and IMA 16.0 has been approved, as well as funding to begin work on IMA 17.0.

MEETING MINUTES-February 17, 2004 Hi-Level Walk Through of IMA 15.0 Committed CR's

Attendees: Anne Robberson-Process Analyst (Qwest), Curt Anderson- IT Systems Analyst (Qwest), Diane Burt-Systems Analyst (AT&T), Donna Osborne-Miller - Carrier Relations Manager (AT&T), Dusti Bastian-Process Analyst (Qwest), Ellen McArthur-Process Analyst (Qwest), Hank Martinez-IT Systems Analyst (Qwest), James McCluskey- ILEC Manager (Accenture), John Daugherty-Product Management (AT&T), John Gallegos-IT Manager (Qwest), Kathy Miller-Process Manager (Qwest), Kim Isaacs- ILEC Relations Process Analyst (Eschelon), Kyle Kirves-IT Analyst (Qwest), Linda Miles-Process Manager (Qwest), Lori Langston-Process Manager (Qwest), Marie Acceno-Systems Analyst (AT&T), Nancy Denny-IT Analyst (Qwest), Nicole James-IT Analyst (Qwest), Pat Bratetic-Process Manager (Qwest), Phyllis Burt-Systems Analyst (AT&T), Randy Owen-IT Manager (Qwest), Shon Higer-Process Analyst (Qwest), Shonna Pasioneck-IT Analyst (Qwest), Stephanie Prull-EDI Business Analyst (Eschelon), Susie Wells-Product/Process Analyst (Qwest) Meeting Facilitator: Nancy Denny (Qwest)

Purpose: High-level walk-through of the CRs that are committed in the IMA 15.0 Release.

Supporting Documents: Qwest Notification: SYST.02.13.04.F.01366.IMAEDI15.0Cand&DocWkth Documentation containing 15.0 Candidate Summaries: February 17, 2004, attached to notification CRs can be found in the Qwest Wholesale Change Request Interactive Report located at:
<http://www.qwest.com/wholesale/cmp/changerequest.html>

Functional Overview: Qwest will create product Identifiers for a new UNE-P with Line Splitting and an Unbundled Loop with Loop Splitting request to allow these to be submitted on a single LSR with a New or Transfer (N or T) order for UNE-P or Unbundled Loop service. This solution will require IMA to create a new Resale (RS) and Centrex Resale (CRS) Line Splitting form/worksheet. The new IMA product identifiers must pre-qualify for DSL to be accepted by IMA. IMA will implement PIA-14 with this request. Qwest will not hold voice portion of LSR if data portion must be conditioned or is unavailable. PIA-14 = data portion not provisioned. IMA will implement 2 new REQ TYP's. UNE-P Splits will have REQ TYP = SB, and UBL Splits will have REQ TYP = UB. IMA will implement new DLEC CCNA field on the LSR form.

Form Impacts: L-UNE Resale (new form) L-UNE Centrex Resale (new form) LSR

Products: Line Splitting Loop Splitting

Activities: ACT = N & T

Meeting Discussion: Linda Miles presented the overview based on the documentation published w/the agenda. James: What are the new forms? Linda Miles- Qwest (Linda): Resale Service Split. Centrex Resale Service Split. Stephanie: For N and T for ACT of D, should we just use the REQTYPE? Linda: On a UNE-P, you'll use the existing rules.

November 20, 2003 Systems CMP Meeting Discussion: Kit Thomte/Qwest stated that Qwest would respond to this walk-on item in an email to MCI, who had to leave the meeting early due to illness. Line Splitting and Loop Splitting are currently targeted for the IMA 15.0 Release. Loop Sharing/Line Sharing was deployed with the IMA 13.0 Release. System Event Notification verbiage for Ticket Number 198295, dated October 13, 2003: Description of Trouble: CMP CR SCR030603-01EXSC was targeted originally for deployment with IMA 13.0 on 08/04/03. One component of the CR, deployment of line and loop splitting orders via single LSR, has been delayed. All other components are scheduled for deployment with 13.0. Business Impact: UNE-P and Line Splitting New Connects and Outside Moves cannot be submitted on a single LSR. Unbundled Loop and Loop Splitting New Connects and Outside Moves cannot be submitted on a single LSR. All other components of the CR will be implemented as planned. Qwest Proposed Work Around: CLECs should continue to follow the current process and submit two LSRs with the Related Purchase Order Number (RPON) field populated for their UNE-P/Line Splitting and Unbundled Loop/Loop Splitting New Connect and Outside Move requests.

-- August 21, 2003 Systems CMP Meeting Discussion: Connie Winston/Qwest stated that this CR has not yet fully deployed as stated in the Event Notification that was sent. There were no questions or comments.

- July 17, 2003 Systems CMP Meeting Discussion: Connie Winston/Qwest stated that this CR would deploy in Release 13.0, on August 4, 2003.

April 17, 2003 Systems CMP Meeting Discussion: Lynn Notarianni/Qwest stated that this CR was previously presented and noted that it is moving forward with IMA 13.0. Kit Thomte/Qwest stated that this CR would move to 'development' status. Lynn Notarianni/Qwest stated that the 13.0 Commitment list is posted to the web and that there is a handout for the room. Lynn stated that Qwest is committing to everything we packaged. Sue Stott/Qwest stated that LR form candidate is much larger than originally anticipated and noted that there are some risks that are being closely tracked and managed. Sue stated that we would do a read out to the CLECs if anything changes that would adversely affect the release. Lynn Notarianni/Qwest stated that on the 13.0 Commitment List, the SCR Candidate was not included. Lynn stated that the list would be revised and reposted. Liz Balvin/MCI asked if Qwest is to provide quotes. Beth Foster/Qwest stated that quotes are provided to the initiator of the SCR request.

- March 20, 2003 Systems CMP Meeting Discussion: Crystal Soderlund/Qwest presented the CR and stated that it will be implemented with the 13.0 Release. Liz Balvin/WorldCom asked if we were voting on SCR today. Lynn Notarianni/Qwest stated that the vote had already occurred and that it passed unanimously. Liz Balvin/WorldCom stated yes, she now remembers. There were no other questions or comments.

-- March 11, 2003 Exception Pre-Meeting
(CMPR.03.07.03.F.01439.ExcepReqPreMtg) Attendees: Kim Isaacs-

Eschelon, Bonnie Johnson-Eschelon, Liz Balvin-WorldCom, Peggy Esquibel-Reed-Qwest, John Gallegos-Qwest, Jim Maher-Qwest, Judy Schultz-Qwest, Cindy Schwartz-Qwest, Crystal Soderlund-Qwest, Connie Winston-Qwest, Linda Miles-Qwest MEETING DISCUSSION: Peggy Esquibel-Reed-Qwest stated that the purpose of the call was to conduct the pre-meeting for the Qwest originated system's CMP change request, which is an exception CR to Add Qwest DSL Loop Qual by Address and Enable Single LSR For New Voice Service & DSL Installation. This exception CR is asking to utilize the SCRCP for this change request. This exception is asking for an exception to the language as stated in the Qwest Wholesale Change Management Document, Section 10.4 which states " The SCRCP may be requested up to 5 calendar days after prioritization results are posted. Peggy stated that Crystal Soderlund (Qwest) will give a hi-level overview of the change request. Crystal Soderlund - Qwest reviewed the CR, stated that the CR is to enable the submission of a single LSR for voice and DSL. Crystal reviewed the impacted product's: UNE-P with Qwest DSL, Resale Qwest DSL, Line Sharing & Splitting, Loop Splitting, POTS (voice). Crystal stated that the current process is that service must be existing in order to order DSL. Bonnie Johnson-Eschelon stated that she was very excited about this request. Bonnie stated that she had previous CR(s) that were denied and asked why the change of mind to implement. Crystal Soderlund-Qwest stated that this CR will be of benefit to both Qwest and to the CLECs. Crystal stated that Qwest currently spends an enormous amount of time with escalations and with orders not posting prior to the second order being submitted. Crystal stated that Qwest would like to implement this system's change with the IMA 13.0 Release. Bonnie Johnson-Eschelon thanked Crystal for her honesty. Liz Balvin-WorldCom asked how SCRCP will be invoked by Qwest and asked if it would be in the same manner as if a CLEC would invoke SCRCP. Jim Maher-Qwest stated that the SCRCP would be invoked in the same manner whether by Qwest or a CLEC. Jim stated that the process is stated in the CMP Document and that Qwest will follow the process as stated. Liz Balvin-WorldCom stated that she did not want to impact IMA resources working on 13.0. Jim Maher-Qwest stated that Qwest understands the concern and stated that this CR would be managed in a manner in that the 13.0 development resources would be separate from the resources for this effort. Liz Balvin-WorldCom asked if this was an Eschelon escalated CR. Peggy Esquibel-Reed-Qwest stated that it is not an Eschelon CR. Peggy stated that this is a Qwest originated CR seeking exception to the SCRCP language that states that SCRCP may be requested up to 5 calendar days after the prioritization results are posted. Peggy stated that the 13.0 prioritization was posted on January 02, 2003. Bonnie Johnson-Eschelon asked if this CR ties into the other DSL CR's that Qwest has originated and asked if for Qwest Resale DSL, will Qwest provide conditioning. Cindy Schwartz-Qwest stated that we use the Loop Qual tool to get a red or a green and that we must get a green in order to submit the request on 1 LSR. Bonnie Johnson-Eschelon clarified that if not a clean green, they would have to submit 2. Cindy Schwartz-Qwest stated yes. Bonnie Johnson-Eschelon asked if this CR would apply only if a clean green is obtained. Cindy Schwartz-Qwest stated that Bonnie's statement is correct. Peggy Esquibel-Reed-Qwest asked if there were other questions. No other questions were brought forward. Peggy Esquibel-Reed-Qwest stated that for the vote, a YES vote will indicate that this CR will be implemented using SCRCP and will be implemented with the IMA 13.0 Release. Peggy stated that a vote of NO will indicate that the SCRCP will NOT be used for this CMP CR and that this CR would then be considered as a late adder for the 13.0 IMA Release with discussion at the next Systems CMP Monthly Meeting.. Liz Balvin-WorldCom asked why this was considered as an exception CR when SCRCP can be invoked at anytime. Peggy Esquibel-Reed-Qwest stated that the exception is due to the SCRCP language that states that SCRCP may be requested up to 5 calendar days after the prioritization results are posted. Peggy stated that the 13.0 prioritization was posted on January 02, 2003. Peggy stated that this CR is seeking exception due to the fact that we are beyond that 5 day period. Liz Balvin-WorldCom asked for clarification of the yes and no votes. Judy Schultz-Qwest stated that what precludes Qwest from using SCRCP is the

language to invoke up to 5 days after prioritization. Judy stated that if the vote is no, Qwest will attempt to get this CR into the 13.0 Release as a late adder. Bonnie Johnson-Eschelon asked that if this CR had been submitted within the 5 days, if it would not have been an exception CR. Peggy Esquibel-Reed-Qwest stated yes, that is correct. There were no other questions brought forward. Peggy Esquibel-Reed-Qwest stated that the meeting for the exception vote will take place on Tuesday, March 18th at 10:00 a.m. MT with the same conference bridge call in number and passcode. Peggy stated that a notice would be sent with the conference call information. The call was adjourned.

QWEST Response

[<Back](#)

Information Current as of 5/17/2004

SEARCH



[ABOUT QWEST](#) | [CAREERS AT QWEST](#)

© 2004 Qwest Communications International Inc. All Rights Reserved | [Legal Notices](#) | [Privacy Policy](#)



LOCAL PHONE SERVICE INTERNET/DSL WIRELESS LONG DISTANCE TV SERVICES
 CUSTOMER SERVICE SEARCH

HOME RESIDENTIAL SMALL BUSINESS LARGE BUSINESS PARTNERS WHOLESALE

Products & Services Resources Operation Support Systems Network Training, Notices & Forums Customer Service

Wholesale

[CONTACT US](#)

Resources

CMP

- ▶ [CMP Home](#)
- ▶ [CMP Document](#)
- ▶ [Team Meetings](#)
 - ▶ [Archive](#)
- ▶ [Change Requests \(CRs\)](#)
 - ▶ [Archive](#)
- ▶ [CMP Redesign](#)
 - ▶ [Archive](#)
- ▶ [Document Review](#)
 - ▶ [Product/Process Archive & Responses](#)
 - ▶ [System Archive & Responses](#)
- ▶ [CMP Oversight Committee](#)
- ▶ [Escalations/Disputes](#)
 - ▶ [Initiation](#)
 - ▶ [Ongoing Escalations](#)
 - ▶ [Archive](#)
- ▶ [OSS Hours of Availability](#)
- ▶ [CMP Points Of Contact \(POCs\)](#)
- ▶ [Customer Notification Letter Archive](#)
- ▶ [CMP Calendars](#)
- ▶ [OSS Interface Releases](#)
- ▶ [Team Meetings](#)
- ▶ [Other System Links](#)

Change Management Process (CMP)

Open System CR SCR120303-01 Detail

Title: Conversions with Number Portability with Flow Through

CR Number	Current Status Date	Level of Effort	Interface/ Release No.	Area Impacted	Products Impacted
SCR120303-01	Pending Prioritization 1/12/2004	5500 - 7000	IMA Common/	Pre-Ordering, Order	See CR Description for Product List

Originator: Soderlund, Crystal

Originator Company Name: Qwest Communications

Owner: Winston, Connie

Director: Winston, Connie

CR PM: Esquibel-Reed, Peggy

Description Of Change

REVISED 12-10-03:

Conversions for this candidate are allowed on all products with or without Number Portability requests.

Products include: Line Splitting UNE-P POTS, Line Splitting-UNE-P PBX Designed Trunks, Line Splitting UNE-P Centrex 21, Line Splitting UNE-STAR, Line Splitting UNE-STAR Centrex 21, Loop Splitting - UBL.. Conversion Activity will be allowed to and from listed products including Conversion from Retail to New UNE-P with Line Splitting with or without Number Port, Line Splitting to new UBL with Loop Splitting with or without Number Port, and Unbundled Analog Loop (LX--) to Unbundled Non-Loaded Loop (LX-N) with Loop Splitting.

ORIG DESCRIPTION:

Allow Conversion activity (ACT = V, or Z) for Line and Loop Splitting Conversions with Number Portability on 1 LSR and allow system flow through

Expected Deliverable:

CMP

IMA 16.0

- ▶ **CMP Home**
- ▶ **CMP Document**
- ▶ **Team Meetings**
 - ▶ **Archive**
- ▶ **Change Requests (CRs)**
 - ▶ **Archive**
- ▶ **CMP Redesign**
 - ▶ **Archive**
- ▶ **Document Review**
 - ▶ **Product/Process Archive & Responses**
 - ▶ **System Archive & Responses**
- ▶ **CMP Oversight Committee**
- ▶ **Escalations/Disputes**
 - ▶ **Initiation**
 - ▶ **Ongoing Escalations**
 - ▶ **Archive**
- ▶ **OSS Hours of Availability**
- ▶ **CMP Points Of Contact (POCs)**
- ▶ **Customer Notification Letter Archive**
- ▶ **CMP Calendars**
- ▶ **OSS Interface Releases**
- ▶ **Team Meetings**
- ▶ **Other System Links**

Status History

Date	Action	Description
12/3/2003	CR Submitted	
12/4/2003	CR Acknowledged	
12/10/2003	Clarification Meeting Held	
12/17/2003	Discussed at Monthly CMP Meeting	Discussed at the December Systems CMP Monthly Meeting; please see December Systems CMP Distribution Package, Attachment C.
12/10/2003	Additional Information	Received Revision to CR Description and Impacted Products.
1/22/2004	Discussed at Monthly CMP Meeting	Discussed at the January Systems CMP Monthly Meeting; please see January Systems CMP Distribution Package, Attachment P
2/4/2004	Release Ranking	16.0 Prioritization- Ranked #2 out of 50
2/19/2004	Discussed at Monthly CMP Meeting	Discussed at the February Systems CMP Monthly Meeting; please see the February Systems CMP Distribution Package, Attachments H & J

Project Meetings

February 19, 2004 Systems CMP Meeting Discussion Excerpt (Attachments H & J): Judy Schultz/Qwest stated that she wanted to provide an update to the funding approval process that was discussed in the January CMP Systems Meeting. Judy referred everyone to Attachment J in the Distribution Package. She stated that all CRs are being re-evaluated and must be approved. Judy said that CRs could not be scheduled without approval. Judy stated that the CRs with an impact to the IMA interface would follow the existing prioritization process. Judy noted that the funding for IMA 15.0 and IMA 16.0 has been approved, as well as funding to begin work on IMA 17.0.

January Systems CMP Meeting Discussion: Crystal Soderlund/Qwest stated that this CR was a high priority for Qwest. John Berard/Covad stated that this CR was a high priority for Covad. Liz Balvin/MCI asked to confirm that with the 13.0 and 15.0 efforts, Qwest is accommodating all other activity types for the submission of a single LSR. Crystal Soderlund/Qwest responded yes. Liz Balvin/MCI asked if this Qwest CR would then cover the activities of V and Z. Crystal Soderlund/Qwest responded yes. John Berard/Covad stated that the migration document (PCAT) does not include Line Sharing with Loop Splitting. Crystal Soderlund/Qwest stated that she has made those changes and noted that the changes would be out the following week. John Berard/Covad asked to confirm that if this CR were voted into 16.0, all migration scenarios would be covered. Crystal Soderlund/Qwest responded yes. John Berard/Covad stated that the document that Qwest has created is a great document. Crystal Soderlund/Qwest stated that this CR would allow combining LSR types; a new header would be developed in IMA.

December 17, 2003 Systems CMP Meeting Discussion: Connie Winston/Qwest stated that this CR was the CR that Liz Balvin (MCI) was referring to, in conjunction with her MCI CR of SCR120303-02. This CR is currently in Evaluation status.

-- CLARIFICATION MEETING - December 10, 2003 SCR120303-02 Allow

single LSR to convert Analog Loop to NonLoaded (2 or 4 wire) or ADSL UBL (Unbundled loop) with Loop Splitting / Submitted by MCI SCR120303-01 Line and Loop Splitting Conversions with Number Portability with Flow Through / Submitted by Qwest

ATTENDEES: Liz Balvin/MCI, Chad Warner/MCI, Peggy Esquibel-Reed/Qwest, Conrad Evans/Qwest, Crystal Soderlund/Qwest, Robert Hercher/Qwest, Sandy Heimann/Qwest, Jim Recker/Qwest, Heidi Moreland

PURPOSE: Peggy Esquibel-Reed/Qwest stated that the call was for clarification of 2 CMP CRs and to determine if Qwest's SCR120303-01 would meet MCI's SCR120303-02 request.

REVIEW CR DESCRIPTION: SCR120303-02 Allow single LSR to convert Analog Loop to NonLoaded (2 or 4 wire) or ADSL UBL (Unbundled loop) with Loop Splitting Qwest currently requires CLECs to submit two LSRs to provision an Unbundled Loop with Loop Splitting when the existing loop is analog. MCI requests Qwest provide the ability to submit a single LSR to convert an Analog Loop to Non-Loaded (2 or 4 wire) or ADSL qualified UBL and add Loop Splitting. Expected Deliverable is that CLECs accomplish converting end user's with analog loops to unbundled loop with loop splitting on a single LSR.

SCR120303-01 Line and Loop Splitting Conversions with Number Portability with Flow Through requesting to allow Conversion activity (ACT = V, or Z) for Line and Loop Splitting Conversions with Number Portability on 1 LSR and allow system flow through. Expected Deliverable is IMA 16.0.

CONFIRMED INTERFACE: IMA Common for both CRs

CONFIRMED PRODUCTS: SCR120303-02 (MCIs): UNE SCR120303-01 (Qwests): Line Splitting, Loop Splitting

ADDITIONAL DISCUSSION: Peggy Esquibel-Reed/Qwest asked Liz/MCI and Crystal/Qwest if they had additional information to provide regarding their requests. Liz Balvin/MCI stated that she needs to be sure what Qwest views as an analog line. Liz stated that MCI sees UNE-P provisioned services as analog and UBL as analog. Liz stated that is regardless of what products are being converted from. Liz stated that she needs to be able to convert to UBL with Loop Splitting. Chad Warner/MCI stated that in the Loop Splitting PCAT it states that if the loop is analog, they need to convert to 2 or 4 wire or to ADSL and would need to add loop splitting. Chad stated that another issue is converting analog loop, UNE-P POTS (2 wire analog) needs to be covered. Chad stated that UNE-P POTS to Loop Splitting needs to be 1 LSR. Crystal Soderlund/Qwest stated that she issued the Qwest CR because Qwest agreed to allow DSL if there is a qualified loop. Crystal stated that her CR is for the scenario of UNE-P to Loop Splitting via 1 LSR. Crystal noted would be able to do for only the ACTs of V or Z, and only if is a DSL qualified loop. Crystal stated that if not a qualified loop, would need to first be qualified via the conditioning process. Liz Balvin/MCI asked to clarify that DSL needs to be qualified. Crystal Soderlund/Qwest stated that the facility would be reused because would know it to be qualified. Liz Balvin/MCI asked for an order for UBL with loop splitting and is existing UNE-P POTS with line splitting, the facilities would be used. Crystal Soderlund/Qwest stated that that scenario would be more complex and stated that it would be covered in the training. Crystal noted that it would be considered a new product and would be covered in the training. Crystal Soderlund/Qwest stated that this would enable UBL information on the loop service form and the adding of POTS splitter on 1 LSR. Liz Balvin/MCI stated that she thinks we are on the same page and stated that it looks to be a new way to place an order. Crystal Soderlund/Qwest stated that IMA currently does not allow to add a new form. Crystal stated that training would cover this. Liz Balvin/MCI asked if this is a new product with pricing

and Interconnection Agreement amendments.. Crystal Soderlund/Qwest responded no. Liz Balvin/MCI asked if this is just to be able to link forms in IMA. Crystal Soderlund/Qwest responded yes and stated that if have an UBL contract and a loop splitting contract, would be submitted as UBL split. Liz Balvin/MCI asked if she would need to certify for that. Crystal Soderlund/Qwest stated that she would check into that and have that information as part of the training. Liz Balvin/MCI stated that if she looks at these 2 CRs, the difference is the Qwest CR is for Line & Loop Splitting and MCI's is for all UNEs. Liz asked that if UNE-P POTS is just that, with no DSL, the UNE could already be conditioned. Crystal Soderlund/Qwest responded as long as the DSL is qualified, they can do that. Liz Balvin/MCI stated that if add UNE to the Qwest CR, MCI's need would be met. Crystal Soderlund/Qwest stated that she could revise her CR to include conversion of LX- to LX-N. Crystal noted that PCAT changes would also need to be made. Crystal stated that with 16.0, if you take an existing analog loop and it is DSL capable, you would be able to submit via 1-LSR. Crystal stated that if is not DSL capable, the CLEC would first need to make it DSL capable. Liz Balvin/MCI asked if this is done via the Loop Qual query. Crystal Soderlund/Qwest stated yes. Liz Balvin/MCI asked that if she wants to determine prior to order submission, how would she know if 2/4 wire loaded or if loop qualified versus DSL qualified. Chad Warner/MCI stated that the Raw Loop Data Tool gives the loop makeup but he would not know if 2 or 4 wire. Crystal Soderlund/Qwest stated that it does not matter if 2 or 4 wire. Liz Balvin/MCI stated that she believes the MCI CR to be different than the Qwest CR. Liz stated that it would be hard for the CLECs to identify if 2 or 4 wire. Liz Balvin/MCI stated that they can now submit UNE-P POTS on a single LSR but that the interval changes. Crystal Soderlund/Qwest stated that the voice and data are provisioned to be the same but that the voice can be held-up. Liz Balvin/MCI stated that the analog loop definition makes her CR different than the Qwest CR. Liz stated that she is not sure if she is comfortable on how the CLECs would identify ahead of time if is DSL qualified. Jim Recker/Qwest stated that Qwest provides the loop make-up to the CLECs. Liz Balvin/MCI asked if the tool states if is qualified. Jim Recker/Qwest stated that the tool states why is not qualified. Chad Warner/MCI asked if UNE-P with Loop Splitting would be documented. Crystal Soderlund/Qwest stated yes, when talking conversion activities. Crystal Soderlund/Qwest stated that the reason that DSL needs to be qualified is due to holding the voice in order to get data in. Liz Balvin/MCI stated that wants to make sure that her CR isn't withdrawn if these CRs are different. Liz agreed that Line Splitting on UNE-P POTS is covered. Liz stated that she needs to determine if UBL is covered. Crystal Soderlund/Qwest stated that if is not qualified, the CLEC would need to submit an LSR to qualify it. Liz Balvin/MCI asked Chad Warner/MCI if he would prefer to wait until documentation comes out before they withdraw their MCI CR. Chad Warner/MCI stated that did not know what the process was. Chad asked that for UNE-P to UNE-P with Line Splitting, the loop needs to be conditioned first with no extra charge and is a 1 LSR process. Crystal Soderlund/Qwest responded, correct, and noted that the voice would be in so it would not be held up. Chad Warner/MCI asked to clarify that if new or conversion, if existing UNE-P and wants to convert to loop splitting, they first need to make sure is conditioned/qualified and if it is, is 1 LSR. If not, is 2 LSRs. Crystal Soderlund/Qwest responded yes. Crystal Soderlund/Qwest stated that if is not qualified, Qwest would jeep it back due to DSL not being qualified and 2 LSRs would be needed. Chad Warner/MCI asked if UNE-P and adding Line Splitting would be 1 LSR. Crystal Soderlund/Qwest responded yes because the voice is already in. Chad Warner/MCI asked if UNE-P to Loop Splitting. Crystal Soderlund/Qwest stated that if DSL qualified it would be 1 LSR. If not qualified, it would need to be qualified 1st, then Loop Splitting could be added. Heidi Moreland/Qwest stated that the origination of the voice would change: for UNE-P, the voice would be from the Qwest switch. UNE-P with Line Splitting is just adding data. For Loop Splitting, the CLEC provides voice from the CLEC switch, not a Qwest switch. Chad Warner/MCI stated that he now understood. Liz Balvin/MCI asked if have conversion at the same time, a UNE-P POTS and Line Splitting, it would be

1 LSR. Crystal Soderlund/Qwest stated that conversion of UNE-P POTS and adding Line Splitting is 1 LSR if DSL is qualified. Liz Balvin/MCI asked if it mattered if line or loop splitting, either has to be qualified. Crystal Soderlund/Qwest stated that if have UNE-P to UNE-P with line splitting, yes. If no UNE-P & need UNE-P with Line Splitting, needs to be DSL qualified. Liz Balvin/MCI stated that it sounds like Qwest would deny her CR any way due to the conditioning process. Crystal Soderlund/Qwest responded probably. There were no additional questions. Peggy Esquibel-Reed/Qwest stated that she needed to clarify previous statements that the Qwest CR changes would take place in 16.0. Peggy stated that the timeframe for the changes is dependant on the 16.0 prioritization outcome and if the candidate gets ranked high enough to move forward. Liz Balvin/MCI asked if this was an SCRIP CR. Peggy Esquibel-Reed/Qwest responded no, not at this time. Liz Balvin/MCI stated that she would discuss these CRs with her internal team and advise if MCI would withdraw SCR120303-02. There were no additional comments or questions. ACTION PLAN: Both CRs are scheduled for presentation at the December Systems CMP Meeting, by the CR originators.

QWEST Response

Revised Draft Response

January 12, 2004

RE: SCR120303-01 Conversions with Number Portability with Flow Through

Qwest has further reviewed the information submitted as part of Change Request SCR120303-01. Based upon the scope of this CR, Qwest is able to provide an estimated Level of Effort (LOE) of 5500 to 7000 hours for this IMA Change Request. Impacts to SATE are 750 to 850 hours for this change request.

This Change Request is an eligible candidate for the IMA 16.0 prioritization vote.

Sincerely, Qwest

-- DRAFT RESPONSE December 10, 2003

RE: SCR120303-01 (Line and Loop Splitting Conversions with Number Portability with Flow Through)

Qwest has reviewed the information submitted as part of Change Request SCR120303-01. Based upon research that has been conducted following the Clarification Meeting (held December 10, 2003) Qwest is still examining the issue. Qwest will continue to research the problem and provide an updated response at the January Systems CMP Meeting.

At the December Monthly Systems CMP Meeting, CMP participants will be given the opportunity to comment on this Change Request and provide additional clarifications. Qwest is interested in the experiences of the CMP community as relates to this issue. Qwest will incorporate any feedback received at the next Monthly Systems CMP Meeting into further evaluation of this Change Request.

Sincerely, Qwest

[←Back](#)

Information Current as of 5/17/2004