BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of Qwest Corporation for Arbitration with Eschelon Telecom, Inc. Pursuant to 47 U.S.C. Section 252 of the Federal Telecommunications Act of 1996	**Docket No. UT-063061**

EXHIBIT BJJ-45

TO THE

SURREBUTTAL TESTIMONY OF BONNIE J. JOHNSON

ON BEHALF OF ESCHELON TELECOM, INC.

APRIL 3, 2007

Resources Change Management Process (CMP)

Open Product/Process CR PC102704-1ES Detail

Title: CR 1: New Revised title effective 1/11/05: Certain Unbundled Network Elements (UNE) Product Discontinuance (see Description of Change for previous title) CR 2 = PC102704-1ES2

CR Number	Current Status Date	Area Impacted	Products Impacted
PC102704-1ES	Completed 3/21/2007	Provisioning, Ordering	See Description of Change

Originator: Whitt, Michael

Originator Company Name: Qwest Corporation

Owner: Buckmaster, Cindy

Director: Hooks, Perry

CR PM: Esquibel-Reed, Peggy

Description Of Change

DOCUMENTATION FOR THIS CR IS CONTINUED ON PC102704-1ES2

Revised Description of Change effective 3/1/05:

This CR will be implemented as a product/process CR as there are no CLEC facing system changes.

This CR details changes to availability of certain Unbundled Network Elements (UNE) products.

The following UNE products are no longer available to CLECs unless the most current effective version of the CLEC's Interconnection

Agreement (ICA) of Amendment includes terms, conditions, and pricing for the products before 6/14/04.

Unbundled Network Element (UNE)- Switching (UBS)
http://www.qwest.com/wholesale/pcat/unswitch.html

Unbundled Network Elements- Platform (UNE-P)-General Information
http://www.qwest.com/wholesale/pcat/unep.html

Unbundled Network Elements - Platform (UNE-P) - Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI)

http://www.qwest.com/wholesale/pcat/unepisdnbri.html

Unbundled Network Elements-Platform (UNE-P)-Centrex
http://www.qwest.com/wholesale/pcat/unepcentrex.html

Unbundled Network Elements-Platform (UNE-P)-Public Access Lines (PAL)
http://www.qwest.com/wholesale/pcat/uneppal.html

Unbundled Network Elements- Platform (UNE-P)- Private Branch Exchange (PBX) Trunks http://www.qwest.com/wholesale/pcat/uneppbx.html

Unbundled Network Elements - Platform (UNE-P)-Plain Old Telephone

Service (POTS) http://www.qwest.com/wholesale/pcat/uneppots.html

Unbundled Network Elements - Platform (UNE-P) - Digital Switched Service (DSS) http://www.qwest.com/wholesale/pcat/unepdss.html

Unbundled Network Elements -Platform (UNE-P) - Integrated Services Digital Network (ISDN) Primary Rate Interface (PRI)

http://www.qwest.com/wholesale/pcat/unepisdnpri.html

The remaining products on this CR are being revised due to changes based on the FCC Order received 2/4/05. The following products will be revised and will be noticed on a future date associated with this change request.

Unbundled Local Loop-General Information

Unbundled Local Loop-Digital Signal Level 1 (DS1) Capable Loop

Unbundled Local Loop-Digital Signal Level 3 (DS3) Capable Loop

Enhanced Extended Loop (EEL)

Loop MUX Combination (LMC)

Unbundled Dark Fiber (UDF)

Unbundled Dedicated Interoffice Transport (UDIT)

Unbundled Customer Controlled Rearrangement Element (UCCRE)

As always, any future changes of law may impact this notification and will be supported by the applicable notification.

Expected Deliverables/Proposed Implementation Date (if applicable):

Implement PCAT changes retroactive to 6-15-04 subject to CMP Guidelines

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Revised Description of Change effective 1/11/05:

This CR will be implemented as a product/process CR as there are no CLEC facing system changes.

This CR details changes to availability of certain Unbundled Network Elements (UNE) products.

The following UNE products are no longer available to CLECs unless the most current effective version of the CLEC's Interconnection Agreement (ICA) of Amendment includes terms, conditions, and pricing for the products before 6/14/04.

-All Enterprise and Mass Market Unbundled Network Elements Switching (UBS) products, detailed in the following Product Catalog

(PCAT): http://www.qwest.com/wholesale/pcat/unswitch.html

-All Enterprise and Mass Market Unbundled Network Elements-Platform (UNE-P) products, detailed in the following PCAT:

http://www.qwest.com/wholesale/pcat/unep.html

-DS1 Unbundled Loop detailed in the following PCAT:
http://www.qwest.com/wholesale/pcat/unloopds1caploop.html

-DS3 Unbundled Loop detailed in the following PCAT:
http://www.qwest.com/wholesale/pcat/unloopds3caploop.html

-Unbundled Dark Fiber (UDF), including E-UDF and Meet-Point UDF, detailed in the following PCAT:

http://www.qwest.com/wholesale/pcat/darkfiber.html

-DS1 and DS3 Unbundled Dedicated Interoffice Transport (UDIT), including E-UDIT and M-UDIT, detailed in the following PCAT:

http://www.qwest.com/wholesale/pcat/udit.html

-DS1 and DS3 Enhanced Extended Loop (EEL) detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/eel.html

-Unbundled Customer Controlled Rearrangement Element (UCCRE) detailed in the following PCAT:

http://www.qwest.com/wholesale/pcat/uccre.html

-DS1 and DS3 Loop Mux Combo detailed in the following PCAT:
http://www.qwest.com/wholesale/pcat/lmc.html

As always, any future changes of law may impact this notification and will be supported by the applicable notification.

Expected Deliverables/Proposed Implementation Date (if applicable):

Implement PCAT changes retroactive to 6-15-04 subject to CMP Guidelines

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Previous Title and CR Description of Change - see below for information prior to 1/10/05. This CR was Revised on 1/11/05

Previous Title:

U.S. Court of Appeals for the DC Circuit decision (USTA II) Decision No. 00-1012, and FCC Interim Rules Compliance: Certain Unbundled Network Elements (UNE) Product Discontinuance

Previous Description of Change:

This CR will be implemented as a product/process CR as there are no CLEC facing system changes.

This CR details changes to availability of certain Unbundled Network Elements (UNE) products pursuant to the U.S. Court of Appeals for the DC Circuit decision 00-1012 ('USTA II') which vacated some of the FCC's unbundling rules, and the subsequent FCC Interim Rules which preserved some of the unbundling rules vacated in USTA II.

In accordance with these orders and findings, the following UNE products are no longer available to CLECs unless the most current, effective version of the CLEC's Interconnection Agreement (ICA) or Amendment includes terms, conditions, and pricing for the products before 6/15/04:

-All Enterprise and Mass Market Unbundled Network Elements Switching (UBS) products, detailed in the following Product Catalog (PCAT):
http://www.qwest.com/wholesale/pcat/unswitch.html

-All Enterprise and Mass Market Unbundled Network Elements-Platform (UNE-P) products, detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/unep.html

-DS1 Unbundled Loop detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/unloopds1caploop.html

-DS3 Unbundled Loop detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/unloopds3caploop.html

-Unbundled Dark Fiber (UDF), including E-UDF and Meet-Point UDF, detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/darkfiber.html

-DS1 and DS3 Unbundled Dedicated Interoffice Transport (UDIT), including E-UDIT and M-UDIT, detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/udit.html

-DS1 and DS3 Enhanced Extended Loop (EEL) detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/eel.html

-Unbundled Customer Controlled Rearrangement Element (UCCRE) detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/uccre.html

-DS1 and DS3 Loop Mux Combo detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/lmc.html

Expected Deliverables/Proposed Implementation Date (if applicable):

Retroactive to 6/15/04 pursuant to FCC Interim Rules, subject to CMP Guidelines.

Status History

Date	Action	Description
10/27/2004		CR Received
10/29/2004		CR Acknowledged
10/29/2004		Customer contacted / clarification held
10/29/2004		CMPR.10.29;04.F.02250.Regulatory_CR_FCC_Interim
11/2/2004		CMPR.11.02.04.F.02261.Regulatory_CR_FCC_Interim
11/4/2004		Revised the CR to remove regulatory classification
11/4/2004		CMPR.11.04.04.F.02273.Regulatory_CR_FCC_Interim
11/9/2004		CMPR.11.09.04.F.02287.Escalation Notification
11/9/2004		Escalation received/posted to web http://www.qwest.com/wholesale/cmp/escalations.html
11/10/2004		Revised the CR title, description, scope in the database
11/17/2004		November CMP Meeting minutes will be posted to the database
12/15/2004		December CMP Meeting minutes will be posted to the database
1/4/2005		Oversight Meeting held URL for Oversight: http://www.qwest.com/wholesale/cmp/coc.html
1/10/2005		Oversight Meeting held URL for Oversight: http://www.qwest.com/wholesale/cmp/coc.html
		Added url to Status History for Escalation and Oversight Meeting information and documentation. Please review

1/11/2005		the below url for additional project information. URL for Escalations: http://www.qwest.com/wholesale/cmp/escalations.html URL for Oversight: http://www.qwest.com/wholesale/cmp/coc.html
1/18/2005		CMPR.01.18.05.F.02487.AdHocMeeting
1/19/2005		Discussed in the January Product Process Monthly CMP Meeting
1/25/2005		Ad Hoc Meeting Held
2/1/2005		PROD.02.01.05.F.02515.MultiplePCATs_CR Related
2/16/2005		Discussed in the February Product Process Monthly CMP Meeting
3/1/2005		Revision made to CR
3/3/2005		PROD.03.03.05.F.02628.FNL-MultiplePCATs_CR_Rela (Final Notice and Qwest Response to Comments)
3/16/2005		Discussed in the Monthly Product/Process CMP Meeting
3/21/2005		Status Changed to CLEC Test, as agreed at the March CMP Meeting, Due to the Implementation of Part 1.
4/20/2005		Discussed in the Monthly Product/Process CMP Meeting
5/18/2005		Discussed in the Monthly Product Process CMP Meeting
6/14/2005		CMPR.06.14.05.F.03015.TRO_TRRO_Ad_Hoc_Meeting
6/15/2005		Discussed in the Monthly Product Process CMP Meeting
6/20/2005		CMPR..6.20.05.F.03042.AdHocMeetingRescheduled
6/30/2005		Ad Hoc Meeting Held
7/20/2005		Discussed in the Monthly Product Process CMP Meeting
8/17/2005		Discussed in the Monthly Product Process CMP Meeting
9/21/2005		Discussed in the Monthly Product Process CMP Meeting
9/29/2005		PROS.09.29.05.F.03322.TRRO_USERID_Passwaord
10/19/2005		Discussed in the Monthly Product Process CMP Meeting
10/25/2005		PROD.10.25.05.F.03400.TRRO_EEL_V2
11/16/2005		Discussed in the Monthly Product Process CMP Meeting
12/14/2005		Discussed in the Monthly Product Process CMP Meeting
1/18/2006		Discussed in the Monthly Product Process CMP Meeting
11/9/2006		Status Changed from Deferred to CLEC Test, for Discussion in the November 15, 2006 CMP Meeting
11/15/2006		Discussed in the November Monthly Product Process CMP Meeting.
11/16/2006		CMPR.11.16.06.F.04340.Ad_Hoc_Meeting
11/27/2006		Ad Hoc Meeting Held
12/5/2006		Matrix Emailed to Call Participants
12/6/2006		Emailed Received from Eschelon: May not agree with the Matrix and are Reviewing Further.
12/7/2006		CMPR.12.07.06.F.04394.Ad_hoc_meeting: Included Matrix and Info for Next Call, on Jan. 3, 2007
12/14/2006		Discussed in the December Monthly Product Process CMP Meeting.
12/14/2006		CMPR.12.14.06.F.04405.Ad_hoc_meeting_RESCHEDULED
1/30/2007	Related Change Request	PC102704-1ES2
	Record	Documentation for this CR is continued on PC102704-

1/30/2007	Update	1ES2
1/17/2007	Discussed at Monthly CMP Meeting	Discussed in the January Monthly Product Process CMP Meeting.
12/15/2006	Communicator Issued	CMPR.12.15.06.F.04413.AdHocMeeting_CORRECTION
3/5/2007	Related Change Request	PC013007-1
3/5/2007	Related Change Request	PC013007-2

Project Meetings

DOCUMENTATION FOR THIS CR IS CONTINUED ON PC102704-1ES2

12-14-06 Prod Proc CMP Mtg: Mark C-Qwest stated that this CR is in Development status & that an ad hoc call was held a few weeks ago which resulted in the creation & distribution of a product matrix being provided to the CLECs. Mark stated that Qwest is awaiting feedback, on the matrix and then will regroup internally & evaluate. Mark then stated that the next ad hoc call is scheduled for January 11th. Mark asked for questions or comments. Bonnie J-Eschelon asked if Qwest could outline what is going to happen with the items in each of the four buckets. Bonnie asked for Qwest's proposal for each of the buckets. Cindy B-Qwest stated that as previously mentioned, discussions would take place in the ad hoc mtgs & noted that Qwest has no set plan. [Comment from Eschelon: Cindy B-Qwest stated that as previously mentioned, discussions would take place in the ad hoc meetings & noted that Qwest has no strategic plan.] Cindy stated that Qwest is waiting for concurrence on the list & feedback on where each item belongs; we can then proceed. Cindy stated that this effort is casual & that Qwest does not want to dictate the flow of the ad hoc mtgs. [Comment from Eschelon: Cindy stated that Qwest is coming at this very casually & that Qwest does not want to dictate the flow of the ad hoc mtgs.] Cindy asked if that answered Eschelon's question. Bonnie J-Eschelon stated that in regard to Qwest's proposal, she is hearing that Qwest does not really have one. Cindy B-Qwest stated that was correct. Cindy suggested that we move forward with the discussions & noted that everyone was now aware of the classifications, including buckets 2&3. Cindy stated that some items, in buckets 2&3, could also end up in bucket 4. Cindy then stated that items that are in litigation are not open for discussion at this time. Cindy stated that buckets 2&3 will be the focus, unless they are in litigation. Bonnie J-Eschelon thanked Cindy for the information & stated that all, except Unbundled Dark Fiber, are currently in litigation. [Comment from Eschelon: Bonnie J-Eschelon thanked Cindy for the information & stated that Eschelon believes that products all, with possibly the exception of Unbundled Dark Fiber, are currently in litigation.] Cindy B-Qwest stated that we would discuss that in the ad hoc mtg. Lynn O-Covad asked when the matrix was sent. Cindy B-Qwest stated that it was sent a few weeks ago. Susan L-Qwest stated that it was provided via email to the call participants on 12/9 & was provided via a notification on 12/7 There were no additional questions or comments.

11-27-06 Ad Hoc Mtg: Kim Isaacs-Eschelon, Sherry Krewett-McLeod, Doug Denney-Eschelon, Laurie Fredricksen-Integra, Sheila Harris-Integra, Kathy Lee-ATT, Kelly Leveritch-Elec Light Wave, Bonnie Johnson-Eschelon, Peggy Esquibel Reed-Qwest, Cindy Buckmaster-Qwest, Mark Nickell-Qwest, Candace Mowers-Qwest, Vicki Dryden-Qwest, Susan Lorence-Qwest, Karen Ferguson-Qwest. Discussion: Peg ER-Qwest stated that this CR that was submitted, by Qwest, in 10-04 for the discontinuance of certain UNE Products. Peg then stated that some products on this CR were implemented & that some of the products were put on hold & the CR was placed in Deferred Status. Peg then noted that at the October Monthly CMP Meeting, Qwest stated that we wanted to take this CR out of deferred status & to start conversations around how to move forward. This CR was placed in CLEC Test. Peg stated that we then received an email in regard to the CR being in CLEC Test status & the thought that Presented might be

more appropriate. Peg stated that the CR was changed from Deferred to CLEC Test due to the implementation of this change for 9 UNE Prods on 3-18-05. There are 8 remaining products on the current CR & noted that Qwest agrees that it is not yet appropriate to ask for closure & that additional discussions are needed & that is what today's meeting is for. Peg then stated that Presented was not an appropriate status, due to the partial implementation of this CR. Peg stated that Presented was for new CRs, after they have been presented in a Monthly CMP Meeting. Peg stated that if the CLECs are uncomfortable with the CLEC Test Status, that the status could be changed to Development. Bonnie J-Eschelon asked if the status could be changed to Evaluation. Peg ER-Qwest stated that CRs in similar situations have been placed in Development status. Bonnie J-Eschelon stated that she would check the CMP Document & would send an email with her decision. Peg ER-Qwest advised Bonnie J-Eschelon to send her email to the cmpcr mailbox, & then turned the call over to Cindy B-Qwest. Cindy B-Qwest stated that she would tee-up the subject in order to introduce & discuss the items that were deferred in 2005. Cindy then stated that she has a suggested approach & noted that she has no structure, agenda, or intention. She wants to talk about subjects to discuss, the order, & grouping. Once the participants decide, we could set an agenda for future meetings. Cindy stated that if subjects are grouped, we would like to work CRs one at a time, from submission to completion. Cindy stated that it would help eliminate confusion & that discussions would be focused on the topic that is current at that time. Cindy then asked the call participants for feedback & suggestions. Bonnie J-Eschelon stated at the October CMP Meeting that there were some products that needed to be addressed & suggested that is where to start the discussion. Cindy B-Qwest stated that the discussions could start there because we need to talk about what is not currently under the ruling, arbitration, on the wire center list, or items that are not currently in the CMP process. Cindy gave examples of OCN, UBL, & Unbundled Packet Switching. Cindy stated that those are not available or that there is no volume. Cindy noted that there could be small elements at the TRRO level. Cindy stated that these discussions should be unstructured & stated that there is no list. Cindy then stated that she wanted to get the CLECs interests & would then go from there. Bonnie J-Eschelon asked which products were completed & which were not completed on the current CR & asked if they could get a list. Susan L stated that she would get the information from the Final Notification & would provide the information later on the call. Cindy B-Qwest stated that the CR is a tracking mechanism for what was implemented & what was not. Cindy stated that this discussion is related only to Local Service products therefore there are items that will not to be discussed on this call, such as 800 data base query. Cindy stated that other Product Managers may want to be addressing those items. Cindy provided examples of EEL, Comingling, LMC, DS1/DS3 Transport, Optical Carrier Level UDIT, UCCRE, Line Sharing, Unbundled Packet Switching, Fiber to the Curb, & others. Cindy asked if the CLECs were asking for a list of all impacted products that will be discussed on this call. CLECsresponded yes. Cindy B stated that she could not discuss the products that she is not responsible for. Sheila H-Integra stated that she would like a list of what was implemented, what is left, what products would be discussed on these calls, & which products would not be discussed. Susan L-Qwest read the list from the current CR of what was implemented & what was not implemented with the current CR. Cindy B-Qwest stated that was a list of PCATs that need to be addressed & asked to clarify if the requested list would be by products or by PCATs. Bonnie J-Eschelon asked that the list be by products with their associated PCATs identified. Cindy B-Qwest stated that she would do her best to compile the list. Bonnie J-Eschelon stated that she noticed that quite a few, such as commingling & shared distribution, are not to be on the list that Susan L read. Cindy B-Qwest stated that is why she asked if the list being requested was to be by prod. Bonnie J-Eschelon stated that she sees 3 buckets: done with PCATs, left to do with PCATs, & those currently in some type of legal arena. Cindy B-Qwest stated she sees 4 lists: the original CR list of what has been implemented, what has not yet been implemented, then what was not addressed on the current CR, & those held for some legal forum. Bonnie J-Eschelon asked if those items that are held for some legal forum are items that could also reside on the list of what has not yet been implemented & on the list of what has not been addressed via the original CR. Cindy B-Qwest stated that they could & stated that she would leave that up to CLEC

input. Cindy stated that is due to the fact that she is not involved in all that is being challenged, as the CLECs are. Cindy noted that the CLECs would need to help identify those. Bonnie J-Eschelon stated that we needed to get our arms around that before we can proceed with the discussions. Bonnie stated that we need the grouping before we can proceed. Cindy B-Qwest stated that she was fine with that & that she would deliver the list in the next few days. Cindy then asked when we would then meet. Bonnie J-Eschelon suggested that we have our next call about 3 days after Qwest provides the list. Peggy ER-Qwest stated that the CMP Process does call for at least 5 business days advanced notice for a call & would base the next call on that as well. Susan L-Qwest stated that Qwest would get the list out & that CLECs could provide suggested groupings back to the cmpcr mailbox, Qwest would compile the list, then schedule the next meeting for further discussion. Cindy B.noted that she would be available after 12-6.

11-15-06 Prod Proc CMP Mtg: Mark C-Qwest stated that this CR had been in deferred status & is now in CLEC Test status. (Comment from Eschelon - Mark C-Qwest stated that this CR had been in deferred status & Qwest is now bringing this in CLEC Test status.) Cindy B-Qwest stated that the FCC issued & released The Report, Order on Remand, &d Further Notice of Proposed Rulemaking (FCC 03-36), referred to as the Triennial Review Order (TRO) effective 10-2-2003 & the Remand Order (CC 01-338) referred to as the Triennial Review Remand Order (TRRO) effective 3-11-2005. Subsequently, Qwest issued CR PC102704-1ES. At that time, Qwest provided notification only on items that were clearly not challenged in the TRO order. CLECs have signed the TRO TRRO amendments to their ICAs & are operating under processes associated with that amendment. Qwest would now like to move forward & release the post TRRO documentation through CMP. TRRO issues that are being addressed by Qwest & CLECs in arbitration of their ICAs or items being challenged by law will not immediately be processed through CMP. Cindy stated that Qwest would like to re-open this CR & would also like to issue subsequent CRs for this effort. (Comments from Eschelon: Cindy B-Qwest stated that the FCC issued & released The Report, Order on Remand, & Further Notice of Proposed Rulemaking (FCC 03-36), referred to as the Triennial Review Order (TRO) effective 10-2-2003 & the Remand Order (CC 01-338) referred to as the Triennial Review Remand Order (TRRO) effective 3-11-2005. Subsequently, Qwest issued Change Request PC102704-1ES. Cindy said, at that time, Qwest provided notification only on items that were clearly not challenged in the TRO order. She said CLECs have signed the TRO TRRO amendments to their ICAs and are operating under processes associated with that amendment. She said Qwest would now like to move forward & release the post TRRO documentation through CMP. Cindy said Qwest is asking to release the undisputed items, those not in arbitration or items being challenged under law. Disputed items will not immediately be processed through CMP. Cindy stated that Qwest would like to re-open this CR & would also like to issue subsequent CRs for this effort.) Bonnie J-Eschelon asked to clarify that Qwest wants to add, in CMP, those not in arbitration or are not being challenged under law. Bonnie asked what Qwest was doing. (Comment from Eschelon:Bonnie J-Eschelon asked Qwest to explain & indicate what products Qwest wants to add in CMP. Cindy B-Qwest stated that Qwest would like to move the current CR, for UNE-P and UBL products, to CLEC Test. The other products would then be addressed via different CRs.) Cindy B-Qwest stated that Qwest would like to move the current CR, for UNE-P and UBL products, to CLEC Test. The other products would then be addressed via different CRs. Bonnie J-Eschelon stated that on the 6-30-2005 call, Qwest said that this would be deferred until Qwest filed SGATS, with CLEC input. Bonnie asked if that was still the plan. [Comment from Eschelon: Bonnie J-Eschelon stated that, on the 6-30-2005 call, CLECs said they wanted to negotiate these terms in ICA negotiations, and Qwest said that, when it filed SGATs, CLECs would at least get an opportunity to have input. Bonnie asked if that was still the plan.) Cindy B-Qwest stated that Qwest is not planning to file SGATs in any state in the near future. Cindy noted that one & a half years ago, we were planning to & that was the intent at that time.Cindy then stated that Qwest is not planning to file SGATs in any state in the near future & would like to move forward based on the CMP process. (Comment from Eschelon: Cindy B-Qwest stated that Qwest is not planning to file SGATs in any state, and that is a change. Cindy noted that was a good point. She said, one & a half years ago, we were planning to & that was the intent at that time.Cindy

then stated that Qwest is not planning to file SGATs and would like to move forward based on the CMP process.) Bonnie J-Eschelon stated that there were TRRO PCATs changed outside of CMP & asked how that would work when the TRRO PCATs would be changed without CLEC input. (Comment from Eschelon: Bonnie J-Eschelon stated that TRRO PCATs were changed outside of CMP without CLEC input & asked how that would work.) Cindy B-Qwest the intent was to cover all issues under this CR. Other products, not contested, such as OCN, UPS; those that can no longer be ordered, the PCATs were moved to a separate place on the web site for those who have signed amendments & for other CLECs to look at. Cindy then stated that Qwest wants to add the PCATs that are not currently under arbitration or under a legal status (i.e. wire center lists) or where states need to finish to resolution. Cindy stated that Qwest wants to propose how to add and post those PCATs, with CLEC input. Cindy then noted that Qwest would like to move forward & make discussions public in an open forum. Cindy proposed that questions & discussion on the structure take place on the first meeting that is currently scheduled for 11-27. (Comment from Eschelon: Cindy B-Qwest said the intent was to cover all issues under this CR. Other products, not contested, such as OCN, UPS; those that can no longer be ordered, the PCATs were moved to a separate place on the web site to cover those who have signed amendments & for other CLECs to look at if you want to see them before you sign an amendment. Cindy then stated that Qwest wants to readdress the PCATs that CLECs did not have input on & that are not currently under arbitration or under a legal status (i.e.wire center lists) or where states need to finish to resolution. Cindy stated that Qwest wants to propose how to add and post those PCATs, with CLEC input. Cindy said Qwest would like to address similarly situated products in chunks for all products with the same flavor. Cindy then noted that Qwest would like to move forward & make discussions public in an open forum. Cindy proposed that questions and discussion on the structure take place on the first meeting that is currently scheduled for 11-27) Bonnie J-Eschelon asked if the statement regarding legal proceedings for wire centers included the Qwest/Eschelon arbitration. (Comment from Eschelon: Bonnie J-Eschelon asked if the statement regarding legal challenges included the Qwest/Eschelon arbitration.) Cindy B-Qwest said yes. Bonnie J-Eschelon said okay. Cindy B-Qwest stated that she proposes that this current CR be moved to CLEC Test & to have the 11-27 ad hoc call in order to start discussions. There were no questions or comments. Mark C-Qwest asked to clarify that the current CR would not be changed or updated. Cindy B-Qwest said that was correct. Mark C-Qwest then asked if the new items would be addressed via new CRs. Cindy B-Qwest said yes. Mark C-Qwest asked if there were any questions or comments. Mark N-Qwest stated that at this time Qwest would like the current CR to reflect CLEC Test in order to maintain continuity going forward. Once the new CRs are discussed & there is more comfort around this effort, the closing of this current CR can be addressed. (Comment from Eschelon: Mark N-Qwest stated that at this time Qwest would like the current CR to reflect CLEC Test in order to maintain continuity going forward. Once the new CRs are discussed & there is more comfort around this effort, Qwest will request closure of the existing CR.) Mark C-Qwest stated that this CR would reflect a CLEC Test status & that Qwest would move forward with the recommended call on 11-27. Bonnie J-Eschelon asked if Cindy B-Qwest had any idea as to what was not included in the legal proceedings at this time. Cindy B-Qwest stated that she is unable to provide a comprehensive list & provided examples of OCN, UBL, & Unbundled Packet Switching. Cindy also noted that Line Sharing may not yet be posted. Bonnie J-Eschelon thanked Cindy B-Qwest for the information. (Comment from Eschelon: Bonnie J-Eschelon thanked Cindy B-Qwest for that information.) There were no additional questions or comments. This CR is in CLEC Test status.

1-18-06 Prod Proc CMP Mtg: Jill M-Qwest stated that this is the CR for the TRO work & because there has been no change in the status, for several months, she would like to put the CR in a Deferred Status. Jill stated that when it is time for the PCAT updates, this CR would move out of Deferred. There was no dissent to moving this CR to Deferred. Kim I-Eschelon stated that there was a notice out today for TRRO and asked if that was separate from this effort. Jill M-Qwest stated that it was separate & that it was a non-CMP Notice. (1/27/06 - Comment from Eschelon: Jill Martain-Qwest stated that the TRRO notices sent today was for CLECs that had signed the

TRRO Amendment.

12-14-05 Prod Proc CMP Mtg: Jill M-Qwest stated that this is still unchanged & that Qwest is still waiting for the SGATs, as previously discussed. This CR remains in Dev Status.

11-16-05 Prod Proc CMP Mtg: Jill M-Qwest stated that there is no change from the previous month.This CR remains in dev.

10-19-05 Prod Proc CMP Mtg: Jill M-Qwest stated that there is no new status for this CR. Liz B-Covad noted that the CLECs do now have access to the secret PCATs.

9-21-05 Prod Proc CMP Mtg: Jill M-Qwest stated that there was no change on this CR & that we are still in a hold mode Liz B-Covad stated that she had a question on a Process Notification on the TRRO Product and Service Log On Jill M-Qwest said that she believed that notice was a Non CMP Notice. Liz B-Covad said that they feel the General Notice should have been a CMP Notice because it was the result of a CR. She said that it did not come out in a notice fashion with & effective date of 10/3. Liz said that she can't comprehend how Qwest can determine that you can only look at a PCAT when an amendment is signed. Liz said that she was confused because she thought it was a process change that Qwest was trying to implement. Liz said that the TRRO does not allow Qwest to restrict the ability to send in orders. Liz said that she would like to formally object to the process Qwest is trying to implement. Jill M-Qwest stated that she would like to take this discussion offline with Covad. Jill said that this stemmed from a Product/Process CR where we agreed in an adhoc meeting, held on 6-30-2005 (see PC102704-1ES for meeting minutes) that the TRRO PCATs would be provided separately. She also said that Qwest & the CLECs agreed Qwest would not update the CMP controlled PCAT documents until the SGATs were approved. Liz B-Covad said that restricting access gives the appearance of preferential treatment. Jill M-Qwest stated that she would like to get the appropriate people together & discuss offline. Bonnie J-Eschelon said that they would like to be included in the discussions. Liz B-Covad stated that it is inappropriate to restrict access to PCATs and that they have a concern with the effective date. Sue W-XO Communications stated that they have a concern as well. She said that they are concerned that Qwest would be implementing differences in process based on the CLEC. Nancy S-Comcast said that they are concerned too. Julie P-TDS Metrocom is concerned. Liz B-Covad stated that the PCATs are not binding and that an adhoc meeting is needed to discuss these concerns. Jill M-Qwest stated that we have noted these concerns & will get back with the CLECs. Liz B-Covad asked if she should escalate via the CMP Process. Jill M-Qwest said no and that we have their concerns noted.

8-17-05 Prod Proc CMP Mtg: Jill M-Qwest stated that there is no change to the status and remains in Development.

7-20-05 Prod Proc CMP Mtg: Jill M-Qwest stated that an adhoc meeting was held to communicate the proposal on how we will move forward and that we will continue down that path. Jill said that this CR will remain in Development.

6-30-05 Ad Hoc Mtg: Rosalin Davis-MCI, Chad Warner-MCI, Chris Terrell-AT&T, Greg Diamond-Covad, Tom Hyde-Cbeyond, Jeff Sonnier-Sprint, Bonnie Johnson-Eschelon, Doug Henney-Eschelon, Liz Balvin-Covad, Kim Isaacs-Eschelon. DISCUSSION: Cindy B-Qwest said that Qwest suggested this Ad-Hoc mtg to help communicate our implementation plans for the TRO TRRO. She said that many of the CLECs are interested in the implementation of the rules laid out in the orders and may have questions. Cindy said the CLECs likely agree that these orders cover numerous products & processes, not to mention availability & even eligibility. Cindy said that Qwest is developing template language that encompasses our obligations under the TRO/TRRO & that we will be filing that template language with the states in the months to come. She said that the normal filing process will be followed likely allowing a comment period from interested parties. Cindy said that in the meantime, our negotiations team

will negotiate the amendment or full template with interested CLECs. Cindy said that negotiation combined with State approval of our template language that is necessary to finalize applicable language &/or processes. Cindy said that in order to most effectively & efficiently work through that process, we believe that it is best to further delay announcements of process or product changes related to these orders via CMP until such time as the language is finalized & will impact all CLECs. She said that no TRO TRRO changes to products or processes will be made across the board until such language is final. Cindy said, as mentioned earlier, we will implement product & process changes only as you sign the amendment or template language, through the change of law provisions that are outlined in your individual contracts. She said that the CLECs, at that time, will be provided with individual PCATs & Business Procedures that are in alignment with their current language so that they can determine any changes to the way you do business with Qwest. Tom H-Cbeyond stated that this plan sounds logical and asked when Qwest could share a draft or final version of the language to review before negotiating. Cindy B-Qwest said that Candice M-Qwest is closer to the filings & this Qwest effort. Candice M-Qwest stated that with the SGAT, there are no filings scheduled yet & with the number of changes, getting language is quite a task. Candice said that there is a negotiations template & a TRO Remand Compliance template onthe Qwest Wholesale Web at www.Qwest.com/wholesale/clecs/amendments.html. Candice said that when the CLECs want to begin negotiations, they can contact the Qwest negotiations team. Tom H-Cbeyond said that they would like to review & schedule negotiations. Candice Mowers-Qwest said that this was a good idea & to wait until the last minute will be a push. Tom H-Cbeyond stated that he would download & review the information. The following question was raised in the meeting: What does this have to do with QPP? Cindy B-Qwest said that this has nothing to do with QPP. She said that the QPP Commercial Agreements are on the same website & will remain there. Liz B-Covad summarized that the purpose of this meeting was to relay information on the TRO negotiations, the templates are out there for review & that the PCATs won't be updated until the final language is approved. Cindy B-Qwest stated that we did not want to make process changes that will impact a lot of you & that we will honor your contracts. She said we will share documents as process changes are made. The following question was asked in the meeting: Does this have anything to do with PC102704-1ES. Cindy B-Qwest said that this CR was opened as a way to communicate changes in the TRO/TRRO. She said that there are more changes coming & the CR is the means to share those changes. Cindy said that the CR was initially issued when the TRO came out and had changes. She said that we had to pull back some of the PCATs but will keep the CR open until we can finish CR. Tom H-Cbeyond said that he understood the format and information can be used on the website. Cindy B-Qwest stated that the next steps depend on where each Company is. She said that they can go to the web, study and start negotiations. Cindy said that if you don't want involvement, they could do nothing. She said that as SGAT language changes, we will have a comment period & that the States will engage you when decisions are made. Cindy also said that PCAT changes will be brought through CMP. There were no additional questions or comments.

6-15-05 Prod Proc CMP Mtg: Jill M-Qwest stated that an ad hoc meeting had been scheduled for 6-22 for discussion of Qwest's direction as a result of the order & to discuss how Qwest would like to move forward. Bonnie J-Eschelon stated that she needs to know who to invite to this meeting & asked for further explanation of the discussion intent. Bonnie then noted that this meeting conflicts with Eschelon's schedule. Bonnie then asked who the Qwest participants would be & asked if there was an agenda. Jill M-Qwest stated that the Qwest participants would be Product Managers & stated that the meeting is to discuss how Qwest CMP would like to move forward with the CMP CRs. Bonnie J-Eschelon asked whom the CLECs should invite to participate & asked if they should include systems people or regulatory people. Jill M-Qwest stated that the discussion should not need systems type people & stated that in regard to regulatory participants; she did not know. Qwest wants to discuss how Qwest would like to move forward from a CMP perspective. Bonnie J-Eschelon stated that it might be a good idea that those involved in TRO or with the change of law participate. Jill M-Qwest stated that the meeting was not regarding the interpretation of the rules; rather how Qwest would like to move

forward with the implementation of the process as it related to CMP Liz B-Covad stated that she is also on vacation on 6-22 and could have a back-up at the meeting. Jill M-Qwest stated that the meeting could be rescheduled. Bonnie J-Eschelon stated that 6-27 would work for Eschelon & noted that Tuesday's & Wednesday's were not good for Eschelon. Jill M-Qwest asked if 6-30 would work. Bonnie J-Eschelon stated yes. Liz B-Covad also said yes.Jill M-Qwest stated that Qwest would see if the meeting could be rescheduled for 6-30 and stated that if it could not, Qwest would look at other meeting options. There were no additional comments or questions.

5-18-05 Prod Proc CMP Mtg: Peggy ER-Qwest stated that this was effective on March 18th for some products & was moved back to development for the implementation of the remaining products. Peggy stated that she was not aware of a date yet. Peggy then noted that the CR would remain in Development status. Liz B-Covad stated that the actual amendment notice is now available and so is the appendix A sheet. Jill M-Qwest stated that we would check with Cindy B-Qwest offline.

4-20-05 ProdProc CMP Mtg: Peggy ER-Qwest stated that this CR is in CLEC Test due to the effective date of 3-18 for the first set of products & stated that Qwest would like to move the CR back to Development status for the implementation of the remaining products. Liz B-Covad asked if there was a timeline for the changes in law provisions. Jill M-Qwest stated that there are no dates yet. There was no dissent to the CR moving back to Development status.

3-16-05 Prod Proc CMP Mtg: Cindy B-Qwest stated that this CR will be effective on March 18th and that she would like to move the CR to CLEC Test on the 18th. Jill M-Qwest stated that she was okay moving this CR to CLEC Test on the 18th, but then would like it moved back to Development status for the rest of the piece. Bonnie J-Eschelon stated that she was okay with this moving to CLEC Test on the 18th, for those that are effective on the 18th. [Comment from Eschelon: but does not think it is appropriate to do so before 3/18.] Cindy B-Qwest agreed. Jill M-Qwest stated that this CR would move to CLEC Test on 3-18, then when the other notices go out for the rest of the CR, the status would change to Development.

2-16-05 Prod Proc CMP Mtg: Jill M-Qwest stated that when the final rulings came out, we received feedback. Jill stated that Qwest would withdraw the PCATs that were affected by the final rules and that Qwest would proceed with UNE-P. Jill stated that Qwest would reissue the PCATs that are being removed from the CR, once it is determined what those changes are & would notify via this same CR.Liz B-Covad asked if Qwest would confirm that Qwest will follow the change of law provisions in their ICA. Comment received from Eschelon 2/24/05 and said she expected a response to her comments. Jill M-Qwest stated that Qwest had received Covads comment & that Qwest would be responding to the comment & all comments that were received. Jill M-Qwest stated that this CR remains in Development status.

1-25-05 Ad Hoc Mtg: Liz Balvin-Covad, Sue Lamb-One Eighty, Elaine Birkquest-Norstar, Sharon Van Meter-AT&T, Becky Quintana-CO PUC, Marty-Rantel, Noreen Carol-Birch Telcom, Chris Terrell-AT&T, Doug Denney-Eschelon, Bonnie Johnson-Eschelon, Tom Hyde-Cbeyond, Rosalin Davis-MCI, Chad Warner-MCI, Cindy Buckmaster-Qwest, Jill Martain-Qwest, Bob Mohr-Qwest, Robyn Libadia-Qwest, Pat Finley-Qwest, Vicki Dryden-Qwest, John Hansen-Qwest, Susan Lorence-Qwest, Jennifer Fischer-Qwest, Pete Budner-Qwest, Chris Quinn Struck-Qwest, Peggy Esquibel Reed-Qwest. DISCUSSION: Peggy ER-Qwest stated that the purpose of the call was for Qwest to review the updates that will be made to PCAT documentation, for this CR. Cindy B-Qwest stated that in the last CMP Meeting, the CR revisions were communicated & that the CR was re-introduced. Cindy stated that Qwest received a lot of opposition in regard to the Regulatory designation. Cindy noted that Qwest agreed to remove the regulatory designation & moved this CR to a non-regulatory category. Cindy also stated that references to the law & regulatory were removed. Cindy noted that law was the reason for the change, but Qwest would now show this CR as non-regulatory. Cindy stated that the changes are based

on Qwest not being obligated to provide products added to the CR. Cindy noted that future changes will affect product offerings & that they would be noticed. Cindy stated that the PCATs are identified & the products are included in the CR. Cindy then stated that there would be a simple change at the beginning of the PCATs that will state that this PCAT change details changes to availability of certain Unbundled Network Elements (UNE) products pursuant to the U.S. Court of Appeals for the DC Circuit decision 00-1012 ('USTA II') which vacated some of the FCC's unbundling rules, & the FCC's Interim Rules, which preserved some of the unbundling rules vacated in USTA II. In accordance with these orders & findings, the 'product specified' is/are no longer available to CLECs unless the most current, effective version of CLEC's Interconnection Agreement (ICA) or Amendment includes terms, conditions, & pricing for the products before 6/15/04. Bonnie J-Eschelon asked if they would be sent out for review. Cindy B said yes & stated that Qwest is not changing the availability to those who have via an ICA; & would make available for CLECs who do not have an ICA. Tom H-Cbeyond asked for the timing of giving DS1 wire center information. Cindy B-Qwest stated that there would be no wire center information & stated that Qwest is standing by for further instructions from the FCC. Cindy stated that the order is not yet posted & said that once it is posted, Qwest would then have it go into effect in 30-days. Cindy noted that the process would be followed & that notices would be sent to communicate the changes.Tom H-Cbeyond stated that he had a concern regarding timing, & noted that by 3-14, major changes would be involved & concerned as to how quickly Qwest would get the changes out. Tom stated that all need to make changes & need time to react. Cindy B-Qwest stated that Qwest would not make changes without the proper timeframes in place. Sharon VM-AT&T asked if this information was in the CR. Peggy ER-Qwest stated that this discussion would be in the meeting minutes of this call. Liz B-Covad stated that if Qwest did not want to receive comments, Qwest needs to state clearly in the notices. Jill M-Qwest stated that the revised & noted Description of Change would also help. Liz B-Covad stated that Qwest needs to provide the intent of the changes & who would be impacted. Jill M-Qwest stated that what Cindy B-Qwest is proposing will be clear in the notices. Liz B-Covad stated that what Cindy B-Qwest related would go a long way & asked to confirm that once the FCC rules are permanent, that Qwest would adhere to the timeframes and go thru the Regulatory process. Jill M-Qwest said that she agreed that if a particular change is a result of the TRO or is a regulatory change, Qwest would follow that process & would provide the appropriate information. Liz B-Covad asked what level of change the PCATs would be. Jill M-Qwest stated that they would be Level 4 Notices. Liz B-Covad stated that she recommends time be provided, due to Cbeyond's concern. Bonnie J-Eschelon said that she had a global comment that she has noticed that the notices do now have additional information included. Bonnie then thanked Qwest for providing that additional information. There were no additional questions or comments. The call was concluded.

1-21-05 Email to Cbeyond: Mr. Hyde, I received your email & will make note of your comments in the CR. As a result of the Oversight meeting that was held with this CR, Qwest is moving forward with the ad hoc call, & if the final rules warrant a change, we will address it at that time. Thank you, Peggy ER Qwest CMP CRPM

1-21-05 Email from Cbeyond: Once again, it is premature to hold any discussion until the permanent FCC rules are issued in the next few weeks. Among other things, the permanent rules allow DS1 loops & EELs in many-if not most-Qwest locations. Any attempt to implement prior to reading the FCC's final order is an exercise in futility & a waste of precious resources.

1-10-05 CMP Ovrsght Mtg. PURPOSE: This was the second meeting of the CMP Oversight Committee to review an issue submitted to the committee on 11/30/04 by Liz Balvin of Covad. The following is the write-up of the discussion. Attendees: Jen Arnold-TDS Metrocom/U S Link, Liz Balvin-Covad, Becky Quintana-Colorado PUC, Bonnie Johnson-Eschelon, Sharon Van Meter-AT&T, Amanda Silva-VCI, Susie Bliss-Qwest, Susan Lorence-Qwest, Bill Campbell-Qwest, Cindy Macy-Qwest, Peggy Esquibel Reed-Qwest, Linda Sanchez-Steinke-Qwest. DISCUSSION: Linda SS-Qwest stated that on Friday Qwest sent an e-mail to Oversight members

explaining that we would prefer to revise the CR PC102704-1ES. By revising the CR the historical information is preserved & the references to law would be removed & the title would be changed. Attached to the e-mail was a redlined CR with the proposed changes. The proposed deletions would become the revised title & the revised description of change keeping the original title & the original description of change within the CR. The Oversight members stated they had received & reviewed. Liz B-Covad stated she did not think this process would preserve the CR history & recalled from the last meeting the only recommendation was to defer the CR until the final rules were issued. Susie B-Qwest stated Qwest reviewed three options for the CR; defer until final rules, amend the CR or withdraw the CR & issue a new CR. Liz B. asked if Qwest was going to consider deferring until the rules are permanent. Susie B. said that the approach was considered & voiced concern that the products are currently not available & current contracts are expiring. Bonnie J-Eschelon stated there are products in the PCAT that cannot be ordered because they are not in the CLEC's contract. Bonnie said she was trying to understand why the CR is needed. Bill C-Qwest explained that the PCATs are based on the approved SGATs & the SGATs can be different from the ICA. We try to time the CMP update changes with the SGAT changes & Qwest did put together SGAT changes. However, the SGAT's have been pulled back with concurrence of the states due to the unsettled regulatory situation post USTA II, post interim order & pre final FCC order. Qwest has changed the ICA language template (insert comment) but the current SGAT's do not accurately reflect the prods Qwest offers & Qwest (end comment) feels it is important to notify CLECs on the changes to the prods. Liz B countered that if the legal implications were removed, the situation is in flux, the permanent rules will be issued later this month & the CLECs are restricted from ordering existing products that are not included in their ICA. Bill C. responded after 6/15/04 CLECs without the ICA including the products do not have the option of ordering the prods. Qwest is choosing to move forward with the CR because the final FCC rules although scheduled to be finalized in January and effective in March, it would most likely be June before changes tothe order are made. Liz B. felt that the process was backward because if a CLEC wants these products they would work with the negotiation team and would not go through CMP (insert comment) because CMP specifically call out ICA's override (end comment). Bill C. discussed that Qwest has an obligation to notice the change in the PCAT when the SGAT has not changed. Bonnie J. said that product availability is based on the ICA and even though Qwest notices about product availability, CLEC's can't get the products without an agreement including the product. Bill C. explained that new CLECs may go to the Qwest website to find which products are available & then would be given a contract that does not list all the products that were available on the website. Normally the SGAT change would force the change in the PCAT. Liz Balvin stated that Qwest restricting products to CLECs who don't have them in their ICA is different than limiting the product availability. The intent of the CR was drawn from legal rules & the permanent rules could change the offering. Bill C responded that the CR would have to be changed. Bonnie J asked if traditionally a new CLEC would go to the SGATor PCAT to see what is available & they are not in sync. Bill C. explained that the PCAT & SGAT are in sync but they are not in sync with Qwest policy.The states are not accepting SGAT changes at this time & the SGAT & PCAT are in sync but the ICA template is different. Becky Q-COPUC asked if Qwest was considering filing the SGAT prior to the final rules or waiting & Bill C.stated that Qwest is waiting, although we did file prior to the USTA decision, but withdrew the filings when it was clear that the states did not believe the timing was right to make the proposed changes knowing full well any state proceedings would have to be revisited. Becky Q voiced concerned that the SGAT on file & the Wholesale tariff are not the current Qwest offering. Liz B & Bill C agreed that the CR was issued as a result of law. Liz was concerned that Qwest would be restricting CLECs from gaining the product going forward but it is available for CLECs with an ICA. Liz B stated that she continues to see the only option is deferring to keep the history of the CR & that not all the history is maintained about the Escalation & Oversight review. Susie B said at the last meeting the committee was polled on the options.Liz B and Bill C discussed whether the CR is limiting products (as called for in the CMP document), restricting new CLECs from getting these products & if a CLECs contract expires then they would be restricted from the product availability. Liz B stated that the CR should identify the interim

rules as the basis for notifying the CLECs of 6/15 product changes & that Qwest is not going to file the SGAT until the permanent rules are available. Bill C agreed that the CR is based on the USTA II rules & that Qwest has restricted the products & changes will have to be made to comply with the final rules. Liz B stated the basis is USTA II & Bill C said he agreed that the basis is USTA II, & under the FCC guidance, are no longer required to provide unbundled elements. Liz B said Qwest's current position needs to be identified in the CR. Bill C said that AT&T & Eschelon have a different opinion. Bonnie J said AT&T & Eschelon agree this is not a Regulatory CR & restated Liz's concern if it was appropriate to issue the CR at all if the guidelines are not followed. We agreed the CR is not regulatory because Qwest was not ordered, Qwest made the choice not to offer the products. Bill C asked Liz if we include the language & make it a regulatory CR. Liz B said that the genesis of the change was the USTA II decision & now Qwest wants to remove that. Bill C stated that during the last meeting it was clear this was not a Regulatory CR. USTA II was a court opinion about what needed to be offered. Bonnie J said that is what takes it out of Regulatory CR classification. Liz B argued that the rules are 'as is' until the permanent rules come out & since it is just an opinion & believes Qwest should follow the SGATs until the rules are permanent. Bill C stated that the DC court vacated the FCC rules & in a sense undermined them & took away the unbundled rules. The FCC said here is the interim rules & will freeze prior to 6/15 until we can put out the final rules. Qwest doesn't want to put the CR in deferred status. Bonnie J said Eschelon does not have an objection to Qwest updating the existing CR (insert comment) because Eschelon has updated CRs without the clock starting over. Becky Q questioned whether the CLECs were arguing the merits of the CR rather than the process that Qwest used. Liz B said the CR could be updated & requested information relating to Oversight & Escalation be included. Linda SS stated that Qwest has not included Escalation response or Oversight minutes in other CRs as the Escalation & Oversight minutes are found in another location on the web site. There was agreement that the CR would provide the revised title, original title, revised description of change, original description of change & url links to the Escalation & Oversight web locations. CR PC120803-1 was provided as an example of a CR that has been revised. Bonnie stated that the history is captured & that this CR is an anomaly because it had the regulatory issue & was not just a systems to process crossover, but does not agree with the CR & does understand what Qwest is trying to accomplish & Qwest feels the need to move forward. Sharon VM stated that AT&T does not think this is a regulatory CR & would like the CR to include the history of what has been discussed. Deferring the CR would be better & revising is acceptable if the history is included. Liz B agreed deferring would be better & revising the CR sets a precedent that the CR is regulatory but not identifying in that way. There was recommendation from Covad, Eschelon, AT&T, TDS/MetroCom & MCI that the CR be deferred until permanent rules are issued. Becky Q stated that without making any statement on the merits of the CR, she believed that Qwest should go ahead with the CR because she agreed with Bill Cs estimated timeline for permanent rules. Qwest would like to move forward by revising the CR. The Oversight Recommendation will include the different recommendations from the Oversight members. Bonnie J & Becky Q discussed the merit of language changes to the CMP process. Liz B & Bonnie J stated that the CR should not have defaulted to CMP as it was not the appropriate approach & the importance of keeping the CMP guidelines in tact. The meeting was concluded.

1-4-05 CMP Ovrsght Mtg. PURPOSE: This was a meeting of the CMP Oversight Committee to review an issue submitted to the committee on 11/30/04 by Liz B-of Covad. The following is the write-up of the discussion. Attendees: Jen Arnold-TDS Metrocom/U S Link, Liz Balvin-Covad, Becky Quintana-Colorado PUC, Bonnie Johnson-Eschelon, Kim Isaacs-Eschelon, Sharon Van Meter-AT&T, Kathy Stichter-Eschelon, Doug Denny-Eschelon, Amanda Silva-VCI, Jeff Sonnier-Sprint, Susie Bliss-Qwest, Susan Lorence-Qwest, Cindy Buckmaster-Qwest, Bill Campbell-Qwest, Cindy Macy-Qwest, Jill Martain-Qwest, Linda Sanchez Steinke-Qwest DISCUSSION: The meeting began with Qwest making introductions. Linda S-S-Qwest reviewed the issue Covad submitted to Oversight on 11/30/04. Linda read from the Description of the Issue; Qwest inappropriate use of CMP to drive legal interpretation of the Law, & the desired resolution; the proposed changes (PC102704-1ES) be withdrawn until Qwest can properly follow the

CMP governing document. Qwest responded on 12/10/04 requesting that Oversight meet to discuss how to move forward with the CR. Liz B reviewed the history of the issue & stated Covad's position that the biggest issue is Qwest is out of scope of CMP. She stated that the first problem is that the Systems CR SCR102704-1RG was identified as Regulatory & did not follow the process of referencing the page & paragraph & called into question the law or mandate. The second problem is that six CLECs objected to the regulatory classification of the CR & the objections should have been addressed. The CR was then converted to Prod Proc, the regulatory classification removed, & Qwest did not follow the crossover guidelines. Qwest's binding response to the Covad escalation continued to assert that Prod Proc is not the correct category & it is a regulatory CR. Qwest has been out of scope of CMP for this CR. [Comment received from Covad: Qwest's binding response to the Covad escalation continued to base decision on USTA II & FCC interim rules but not call regulatory. Qwest has been out of scope of CMP for this CR.]Susie B-Qwest stated Qwest's position was when objections to the regulatory classification were received, the regulatory definition in CMP did not fit. There was not unanimous agreement that the CR was regulatory. Section5.1.1 states that if there is not unanimous agreement then the CR will be treated as non-regulatory. PCAT changes need to be made & when PCAT changes are made, Qwest is obligated to notify the CLECs by following 5.4.5 limiting the product availability. Qwest proceeded as a Prod Proc Level 4 change. Liz B & Susie B discussed the concern that CLECs were not given a chance to discuss the CR & whether Qwest was limiting or restricting availability of products. [Comment received from Covad: Liz B stated that CLECs were not given the opportunity to iron out whether the CR should have been categorized as regulatory. Susie B indicated that Qwest has the right to limit the availability of products based on the CMP document. Liz Balvin stated that Qwest is not limiting, but restricting products that other carriers continue to be able to purchase.]Bonnie J-Eschelon stated that Qwest can not make a decision as a company & not allow the customer to order the product any longer. It is required to provide the basis under which the product is removed. Bill C-Qwest, Liz B, Bonnie J, & Susie B discussed resolving the issue by providing the USTA II document & identifying for each product the page & paragraph reference. Liz B & Bonnie J were concerned that CMP process has not been followed, & stated the CR is lacking the steps required. Susie B asked if citing the paragraph would resolve. Liz recalled that the CMP document was written to address regulatory CRs & that Qwest tried to remove the regulatory classification & page & paragraph of law should be provided to move forward with the change. Cindy B-Qwest restated Liz's position; Covad does not want the Regulatory classification removed, but instead would like Qwest to add the page & paragraph. [Comment received from Covad: Cindy B-Qwest asked to restate Liz's (Covad's) position; does Covad want the Regulatory classification removed or Qwest to cite add the page & paragraph. Liz's stated that Qwest continues to call into question the law but not want to cite page & paragraph, there is a difference.] Further discussion ensued between Liz B & Cindy B whether appropriate to revise the CR or leave the CR as is currently. Susan L-Qwest added that when grandparenting products, the CRs remove the product availability. Liz B felt that Qwest has called into question the law & has jerry rigged the CMP process to meet Qwest's needs because there are system edits in place to restrict ordering the products. [Comment received from Covad: products & that the notifications, even level 4 notices carry the clause that IA supercede PCAT documents.]Becky Q-COPUC asked if Liz's issue was there is not a way the CR can be categorized as a regulatory CR. Liz Balvin responded that Qwest has called into question the law & should follow the CMP guidelines & provide page & paragraph. Becky Q stated that if Qwest withdraws the CR & then re-submits the CR as regulatory it is not clear how the CLECs could object. Sharon VM-AT&T stated AT&T had objected to the regulatory classification & read the AT&T attorney position. Cindy B. interjected that this is the very objection that resulted in Qwest removing Regulatory classification from the CR. A number of CLECs objected on this basis & that is where Qwest took its action from. Liz indicated that may have been some CLEC prematurely showing part of their hand but she didn't see these remarks nor a response from Qwest on these remarks & therefore didn't know Qwest had this information. Bonnie J, Bill C. & Cindy B. discussed that a regulatory classification means Qwest cannot (by law) provide the product & a non-regulatory classification means that Qwest

does not have an obligation to & chooses not to provide the product. It was agreed this CR is non-regulatory. Becky Q. added that it is now clear why this is not a regulatory CR. Liz B-Covad stated that had objected to the Systems CR & then escalated the Prod Proc CR. If Qwest had followed the process, the CLECs would have discussed the objections and Qwest's responses to the objections. Qwest is aware of all the other CLEC's positions. [Comment received from Covad: Liz Balvin stated it is easy for Qwest, now that it has all the information in hand, to take this new position. If Qwest had followed the process, the CLECs would have discussed the objections & Qwest's responses to the objections. Qwest is aware of all the other CLEC's positions & by not following the CMP guidelines has eliminated CLECs insight to all that Qwest has.] Cindy B. requested input on how the CR could be moved forward. Liz B. requested that Qwest respond to the objections. There was discussion between Linda S-S, Liz B.& Susie B. concerning Section 5.1.1 related to any requirement that Qwest respond to objections. There was further discussion between Liz B, Susie B, Cindy M & Susan L regarding the CMP voting process, classification of the CR, following CMP guidelines for the CR & the precedent that has been set with change to disposition requests. Liz felt these were different situations. [Comment received from Covad: Liz stated these situations were different because no one has requested a change in disposition.]Becky Q. asked if the concern was that Qwest did not follow the process outlined in 5.1.1 or if the concern would be the same if 5.1.1 were followed. Liz B said she couldn't say for sure because Qwest has all the ammunition & we have none. Bonnie J & Becky Q discussed Qwest exercising their rights to limit product availability, basis for product limitation as it relates to PCAT comments, limiting of products prematurely, & appropriateness of legal discussion on Prod Proc changes.[Comment received from Eschelon: Bonnie J & Becky Q discussed Qwest exercising their rights to limit product availability, basis for product limitation as it relates to PCAT comments, Bonnie said Qwest is limiting products prematurely & Becky agreed. Becky & Bonnie discussed the appropriateness of legal discussion on Prod Proc changes.]Susan L. & Liz B. discussed processing grandparenting change requests, the tariff reference being out of CMP scope & whether the products are currently ordered by CLECs. Liz felt this CR is different because Qwest is citing the law. [Comment received from Eschelon: and on grandparenting CRs no CLECs order the products.][Comment received from Covad: Liz stated that whenever Qwest grandfather's a product, the first question from CLECs is whether anyone is ordering the products.]Cindy B. responded that Qwest has the right to not have to offer products based on the law. Kim I-Eschelon said that the title of the CR, USTA II, implies that the change is based on the law. Cindy B. said that she was not involved when the CR was initiated or when it was decided it was a regulatory CR. The change is not a mandate & Qwest is obligated to notify CLECs of the change. There has been no effort to jerry rig CMP. Qwest is notifying CLECs the products will not be available on a going forward basis. Liz B & Becky Q discussed if notification should be through CMP & PCAT changes. Bill C said a note in the PCAT stating if the CLEC does not have these products in the current ICA then these products are not available. Bill C, Liz B & Cindy B continued discussing options to process the CR, ability to vote down a regulatory CR & then move it to prod proc. Re-issuing the CR & starting the clock over based on conversation & intent, changing the title & editing the CR, & posting of historical information to the CR. Bonnie J asked that the meeting minutes reflect all of the conversation that has taken place. [Comment received from Eschelon: Bonnie said Qwest often reflects their views but not CLECs.]Liz B, Sharon VM, Susie B & Becky Q presented options to process the CR; changing it to a regulatory CR because it is citing the law, submitting a new ProdProc non-regulatory CR stating intentions, changing the CR title, deferring, amending the current CR & maintaining the history. Susan L suggested Oversight members take a poll on which would like to modify the existing CR, which would like a new CR .Bill C, Becky Q, Cindy B, Bonnie J, & Liz B discussed options related to the CR. The CR is currently accurate & may change soon. When the final rules are issued DS1 & DS3 loops may not be accurate. [Comment received from Eschelon: When the final rules are issued this will change because DS1& DS3 loops may not be accurate.] Bill C asked if the CR is moved to deferred status if the CLEC community is willing to waive the notification requirement. Kim I & Bill C discussed SGAT changes, PCAT changes & the ICA negotiations. [Comment received from Eschelon: Bill said that the current negotiation

template reflects the correct information but the SGATs have not been updated. Bonnie asked if there was a particular CLEC that was challenging Qwest on this issue & if that is why Qwest needed to update PCATs.]Cindy B, Bonnie J & Liz B continued discussion related to processing the CR, Bonnie J, Bill C & Liz B discussed how CLECs should be notified of the product change & the PCAT reflecting the SGAT, notification through change of law, how contracts override the PCATs, & product availability is negotiated through the ICA agreements. [Comment received from Eschelon: Bonnie said if Qwest will limit product availability in its existing ICA, Qwest would need to notify Eschelon through the change in law provision of its contract and not through a PCAT CMP notice. Bill agreed.] Becky Q suggested that Qwest discuss the CR options internally. The Oversight committee agreed to meet again on 1/10/04 at 3:00 p.m. MT. The meeting was concluded.

1-19-05 Prod Proc CMP Mtg: Jill M-Qwest stated that a meeting was held & that the CR Title was revised. Cindy B-Qwest provided history of the CR & noted that the CR was issued as Regulatory & it limited the availability on certain products. The CR designation changed, in 11-2004, to a Prod Proc CR & that several elements remained on the request. Cindy noted that there was discussion in December & on a 1-5 ad-hoc meeting. Cindy stated that the CR was again revised & noted that there is no law forcing Qwest to make this decision. Cindy stated that this is an opportunity that Qwest is taking advantage of. Cindy noted that the CRs Title & Description were changed to remove references to USTA II. Cindy then reviewed the new Title and Description. Cindy stated that the CR Description states "any future changes of law may impact this notification & will be supported by the applicable notification". Cindy stated that the CR is in Development status & will notify the CLECs, on a going forward basis, the dates that the products cannot be ordered. Cindy then noted that there is an ad-hoc meeting scheduled for 1-25 to review the changes. Linda SS-Qwest stated that Qwest sent a notice on 1-17 and as there was no recommendation from Oversight, the notice included the competing recommendations. Jill M-Qwest asked if there were any questions or comments. Bonnie J-Eschelon stated that she has not yet reviewed the revisions & will reserve comments for the ad-hoc meeting. [1/28/05 Comment from Eschelon: and/or comment cycle.]

12-2005 CMP Mtg: Cindy B-Qwest advised that we have suggested an Oversight Committee meeting be held. Qwest has scheduled the meeting for 12-20 at 1:00 p.m. MT. Liz B-Covad advised that Qwest continues to site law without issuing the CR as Regulatory. Covad believes system edits are in place to not allow CLECs to order products not available. If Qwest sites legal interpretation of law the page & paragraph must be included. Covad is not saying that CMP is or isn't the right forum, but Qwest is trying to make a unilateral decision & we do not know what law Qwest is citing. Qwest doesn't believe the CLECs need to know what page & paragraph are referenced, as the CMP document states. It was agreed more discussion would take place at the Oversight meeting. This CR will move to Development Status.

11/17/04 CMP Mtg: Cindy B-Qwest stated that this CR has drawn quite a bit of attention. Qwest would like to clarify the intent of the CR. Cindy advised that we are having an ad hoc meeting on Friday, 11-19 to review the documentation & take issues. Qwest apologizes for the confusion as we issued the CR two times. The CR was modified to clarify the scope to include USTA II & FCC Interim Rules. Cindy B.advised that CLECs who have language in their ICA can continue to order these products & CLEC who do not have language in their ICA can not order the products nor amend their ICA to include such language. Cindy listed the products affected. Josh T-TelWest asked what if a CLEC opts into an existing contract? Cindy B-Qwest advised that you are permitted with the exception of the elements cited. David M-TelWest questioned without signing a TRO USTA II agreement a CLEC can opt into a contract? David advised that Qwest Regulatory has said CLECs can not do this. Cindy B-Qwest said that the contract would be modified as it has to be TRO & USTA II compliant. Liz B-Covad advised that we continue to object that Qwest bring (insert comment from Covad/Eschelon) to CMP its legal interpretation. Liz advised that Qwest is using ad hoc meetings to gain insight into the CLECs view of

the law and it is inappropriate (end comment). Cindy B-Qwest advised this has nothing to due with Qwest telling our interpretation of the law. This is in CMP to advise about a product that is being limited. Liz B-Covad stated that this is more than a product being discontinued.In addition, Qwest can not cite the law & then not call it a Regulatory CR. There are legal means to negotiate agreements. Cindy B. advised this CR was initially a Regulatory CR & it was opposed. That is why we changed it to a Prod Process CR. We are only telling you that you can't have the product if you don't have it in your contract. Liz B-Covad advised the reason they objected to the Regulatory classification is that Qwest didn't cite the page & paragraph. Qwest is still citing the law, [comment from Covad/Eschelon) not calling it a regulated changed and that is still out of scope for CMP. Liz advised that Qwest should have followed CMP governing document & not simply converted the systems CR to prod proc, that the objections should have been addressed & if agreed to by the community, the CR would have 'crossed over' to prod proc. Qwest is trying to manipulate the CMP process to fit their needs. Liz advised that it is inappropriate for Qwest to host an ad hoc meeting. Without following the CMP governing documentation, Qwest is asserting its legal interpretation, & that is the problem (end comment) This should be handled through arbitration of contracts. Cindy B. restated that if you do not have the products in your contract you can not order them. Qwest does not have an obligation to offer this. David M-TelWest said it is not important to me what Qwest's interpretation is. It should be arbitrated & not unilaterally implemented by Qwest. Cindy B. summarized & clarified the discussion-if Qwest sites the page & paragraph, and why it is the law, & if we come to agreement on the language in the CR, than we can move it forward in CMP. Bonnie J-Eschelon said whether or not we agree on the language, this should not be discussed in CMP. We do not discuss legal interpretation in CMP. This should be done in a different forum. Liz B-Covad stated that this is an ICA negotiation discussion. David M-TelWest stated that he still has a concern with how we are treating CLECs without an existing ICA & that they can not opt into existing ICAs. I think the interpretation is wrong & CLECs should be able to do this. Qwest agreed to cancel the 11-19 ad hoc meeting, review the CR, & provide additional information at a later date. This CR will move to Presented Status. (comment from Eschelon) Cindy B. said like in the words of Arnold Swartzager I'll be back (end comment).

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Information Current as of 3/26/2007

Resources Change Management Process (CMP)

Open Product/Process CR PC102704-1ES2 Detail

Title: CR 2: New Revised title effective 1/11/05: Certain Unbundled Network Elements (UNE) Product Discontinuance (see Description of Change for previous title) CR 1 = PC102704-1ES

CR Number	Current Status Date	Area Impacted	Products Impacted
PC102704-1ES2	Completed 3/21/2007		See Description of Change

Originator: Whitt, Michael

Originator Company Name: Qwest Corporation

Owner: Buckmaster, Cindy

Director: Campbell, Bill

CR PM: Esquibel-Reed, Peggy

Description Of Change

THIS DOCUMENTATION IS CONTINUED FROM PC102704-1ES

Revised Description of Change effective 3/1/05:

This CR will be implemented as a product/process CR as there are no CLEC facing system changes.

This CR details changes to availability of certain Unbundled Network Elements (UNE) products.

The following UNE products are no longer available to CLECs unless the most current effective version of the CLEC's Interconnection

Agreement (ICA) of Amendment includes terms, conditions, and pricing for the products before 6/14/04.

Unbundled Network Element (UNE)- Switching (UBS)
http://www.qwest.com/wholesale/pcat/unswitch.html

Unbundled Network Elements- Platform (UNE-P)-General Information
http://www.qwest.com/wholesale/pcat/unep.html

Unbundled Network Elements - Platform (UNE-P) - Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI)

http://www.qwest.com/wholesale/pcat/unepisdnbri.html

Unbundled Network Elements-Platform (UNE-P)-Centrex
http://www.qwest.com/wholesale/pcat/unepcentrex.html

Unbundled Network Elements-Platform (UNE-P)-Public Access Lines (PAL)
http://www.qwest.com/wholesale/pcat/uneppal.html

Unbundled Network Elements- Platform (UNE-P)- Private Branch Exchange (PBX) Trunks http://www.qwest.com/wholesale/pcat/uneppbx.html

Unbundled Network Elements - Platform (UNE-P)-Plain Old Telephone

Service (POTS) http://www.qwest.com/wholesale/pcat/uneppots.html

Unbundled Network Elements - Platform (UNE-P) - Digital Switched Service (DSS) http://www.qwest.com/wholesale/pcat/unepdss.html

Unbundled Network Elements -Platform (UNE-P) - Integrated Services Digital Network (ISDN) Primary Rate Interface (PRI)

http://www.qwest.com/wholesale/pcat/unepisdnpri.html

The remaining products on this CR are being revised due to changes based on the FCC Order received 2/4/05. The following products will be revised and will be noticed on a future date associated with this change request.

Unbundled Local Loop-General Information

Unbundled Local Loop-Digital Signal Level 1 (DS1) Capable Loop

Unbundled Local Loop-Digital Signal Level 3 (DS3) Capable Loop

Enhanced Extended Loop (EEL)

Loop MUX Combination (LMC)

Unbundled Dark Fiber (UDF)

Unbundled Dedicated Interoffice Transport (UDIT)

Unbundled Customer Controlled Rearrangement Element (UCCRE)

As always, any future changes of law may impact this notification and will be supported by the applicable notification.

Expected Deliverables/Proposed Implementation Date (if applicable):

Implement PCAT changes retroactive to 6-15-04 subject to CMP Guidelines

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Revised Description of Change effective 1/11/05:

This CR will be implemented as a product/process CR as there are no CLEC facing system changes.

This CR details changes to availability of certain Unbundled Network Elements (UNE) products.

The following UNE products are no longer available to CLECs unless the most current effective version of the CLEC's Interconnection Agreement (ICA) of Amendment includes terms, conditions, and pricing for the products before 6/14/04.

-All Enterprise and Mass Market Unbundled Network Elements Switching (UBS) products, detailed in the following Product Catalog

(PCAT): http://www.qwest.com/wholesale/pcat/unswitch.html

-All Enterprise and Mass Market Unbundled Network Elements-Platform (UNE-P) products, detailed in the following PCAT:

http://www.qwest.com/wholesale/pcat/unep.html

-DS1 Unbundled Loop detailed in the following PCAT:
http://www.qwest.com/wholesale/pcat/unloopds1caploop.html

-DS3 Unbundled Loop detailed in the following PCAT:
http://www.qwest.com/wholesale/pcat/unloopds3caploop.html

-Unbundled Dark Fiber (UDF), including E-UDF and Meet-Point UDF, detailed in the following PCAT:

http://www.qwest.com/wholesale/pcat/darkfiber.html

-DS1 and DS3 Unbundled Dedicated Interoffice Transport (UDIT), including E-UDIT and M-UDIT, detailed in the following PCAT:

http://www.qwest.com/wholesale/pcat/udit.html

-DS1 and DS3 Enhanced Extended Loop (EEL) detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/eel.html

-Unbundled Customer Controlled Rearrangement Element (UCCRE) detailed in the following PCAT:

http://www.qwest.com/wholesale/pcat/uccre.html

-DS1 and DS3 Loop Mux Combo detailed in the following PCAT:
http://www.qwest.com/wholesale/pcat/lmc.html

As always, any future changes of law may impact this notification and will be supported by the applicable notification.

Expected Deliverables/Proposed Implementation Date (if applicable):

Implement PCAT changes retroactive to 6-15-04 subject to CMP Guidelines

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Previous Title and CR Description of Change - see below for information prior to 1/10/05. This CR was Revised on 1/11/05

Previous Title:

U.S. Court of Appeals for the DC Circuit decision (USTA II) Decision No. 00-1012, and FCC Interim Rules Compliance: Certain Unbundled Network Elements (UNE) Product Discontinuance

Previous Description of Change:

This CR will be implemented as a product/process CR as there are no CLEC facing system changes.

This CR details changes to availability of certain Unbundled Network Elements (UNE) products pursuant to the U.S. Court of Appeals for the DC Circuit decision 00-1012 ('USTA II') which vacated some of the FCC's unbundling rules, and the subsequent FCC Interim Rules which preserved some of the unbundling rules vacated in USTA II.

In accordance with these orders and findings, the following UNE products are no longer available to CLECs unless the most current, effective version of the CLEC's Interconnection Agreement (ICA) or Amendment includes terms, conditions, and pricing for the products before 6/15/04:

-All Enterprise and Mass Market Unbundled Network Elements Switching (UBS) products, detailed in the following Product Catalog (PCAT):
http://www.qwest.com/wholesale/pcat/unswitch.html

-All Enterprise and Mass Market Unbundled Network Elements-Platform (UNE-P) products, detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/unep.html

-DS1 Unbundled Loop detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/unloopds1caploop.html

-DS3 Unbundled Loop detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/unloopds3caploop.html

-Unbundled Dark Fiber (UDF), including E-UDF and Meet-Point UDF, detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/darkfiber.html

-DS1 and DS3 Unbundled Dedicated Interoffice Transport (UDIT), including E-UDIT and M-UDIT, detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/udit.html

-DS1 and DS3 Enhanced Extended Loop (EEL) detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/eel.html

-Unbundled Customer Controlled Rearrangement Element (UCCRE) detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/uccre.html

-DS1 and DS3 Loop Mux Combo detailed in the following PCAT: http://www.qwest.com/wholesale/pcat/lmc.html

Expected Deliverables/Proposed Implementation Date (if applicable):

Retroactive to 6/15/04 pursuant to FCC Interim Rules, subject to CMP Guidelines.

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Status History

Date	Action	Description
1/30/2007	Related Change Request	PC102704-1ES
1/30/2007	Record Update	THIS STATUS HISTORY IS CONTINUED FROM PC102704-1ES
1/17/2007	Discussed at Monthly CMP Meeting	Discussed in the January Monthly Product Process CMP Meeting.
2/6/2007	General Meeting Held	Ad Hoc with CLEC Community Held
2/21/2007	Discussed at Monthly CMP Meeting	Discussed in the February Monthly Product Process CMP Meeting
3/5/2007	Related Change Request	PC013007-1
3/5/2007	Related Change Request	PC013007-2

Project Meetings

DOCUMENTATION FOR THIS CR IS CONTINUED FROM PC102704-1ES. PLEASE SEE PC102704-1ES FOR PRIOR PROJECT MEETINGs INFORMATION FOR THIS CHANGE REQUEST.

- February 21, 2007 Product Process CMP Meeting: Mark Coyne-Qwest stated that at the end of the last ad hoc call it was mentioned that Qwest would schedule additional calls in order to continue the discussions on this CR to categorize products on the TRRO Product matrix and try to move forward with a prioritization of products. The original Qwest plan to gain CLEC input on the priority of the various products has not been as

successful as we planned or hoped. We heard all the comments on that call and considered all the feedback that another call would just be rehashing the same things again. We then took all that feedback and gave it some additional thought in order to determine what the most logical next step would be, to allow Qwest and the CLEC community to continue to move forward on this issue. What makes sense at this point, to Qwest, is that we issue individual CMP CRs for the products that need to be addressed in CMP and hold discussions for specific CRs or product groupings. That would allow those CLECs with impact on those specific products to have a CMP forum for input on the process related changes associated with these products. It should provide a more meaningful and valuable method for proceeding with this effort for Qwest and for those CLECs who are impacted by these changes. Some, if not all, of those CRs will be submitted for the March 21st CMP Meeting. Bonnie Johnson-Eschelon stated that on the last call, Cindy Buckmaster (Qwest) committed to taking one of her products, due to Integra's concerns regarding the PCATs, and to re-do the PCAT and meet on those changes. Bonnie asked if Qwest is now not going to do that. [Comment Received from Eschelon: Bonnie Johnson-Eschelon stated that on the last call, Cindy Buckmaster (Qwest) committed to taking one of her products, due to Integra's concerns regarding Qwest cut an pasting information from the ICA into the PCATs, and to re-do the PCAT and meet on those changes. Bonnie asked if Qwest is now not going follow through with that commitment.] Mark Coyne-Qwest stated that we internally evaluated what would work best and determined that the next step should be to issue the CRs. Bonnie Johnson-Eschelon stated that she had no comment at this time.

February 6, 2007 Qwest/CLEC Ad Hoc Meeting: ATTENDEES: Mary Roberts-Unicon, Sue Yoder-Iowa Telecom, Pam Trickel-TDS MetroCom, Julie Redmond Carter-McLeodUSA, Kathy Lee-AT&T, Peter Huley-TDS MetroCom, Lynn Oliver-Covad, Ken Black-McLeodUSA, Sheila Harris-Integra, Steve Fisher-Integra, Jay Newsbom-Integra, Nancy Thompson-Wisor, Joyce Bilow-McLeodUSA, Karen Clausen-Eschelon, Doug Denney-Eschelon, Bonnie Johnson-Eschelon, Colette Davis-Covad, Rod Cox-TDS MetroCom, Cindy Buckmaster-Qwest, Susan Lorence-Qwest, Candace Mowers-Qwest, Vicki Dryden-Qwest, Lynn Stecklein-Qwest, Peggy Esquibel Reed-Qwest, Karen Chandler Ferguson-Qwest, Mark Coyne-Qwest DISCUSSION: Peggy Esquibel Reed-Qwest stated that the purpose of this meeting was to continue with the open dialogue for the TRO/TRRO CMP CR. The documents for this meeting can be accessed from the Wholesale calendar out on the CMP web site, by clicking on the entry for this call. Those documents are the PCAT Impacts Matrix and 2 other documents which are the CRs for this effort. PC102704-1ES which is the original CR and contains the history thru January 10th. It references PC102704-1ES2 for the continuation of the history for this effort. The creation of PC102704-1ES2 was necessary due to the character limitation being reached for the original CR, in our data base that houses the CR information. This means that that the PC102704-1ES record/CR could not house any more data or content. PC102704-1ES2 was then created in order to continue with the documentation of this effort. The 2 CRs (-1ES and -1ES2) have a complete accounting of all that has transpired, all the history, regarding the calls and communications that have been held and documented. There was a concern, received in an email, that 2 CRs creates the impression that there is no earlier status history. That should not be the case because the 2 CRs are VERY clearly marked and cross referenced in 6 different places: 1) The numbering of the CRs carries the same number with the 2 added to the end of the continuation CR. 2) The CR Titles are the same and make reference to the other CR 3) The first statement in the CR descriptions note that 'Documentation for this CR is continued on/from the other CR number' 4) There is a Status History Line that indicates that there is a Related CR and notes the CR that is continued to/from 5) There is a second Status History Line of a Record Update stating that documentation is continued to/from the other CR 6) The Project Meetings portion of the CRs each contains a statement AT THE TOP that documentation is continued to/from the other CR. Again, there has been no loss of any history for this CR, the history is complete. Both CRs are active and are available via the Interactive Reports out on the web site. The call today as well as future communications will be documented on the continuation CR PC102704-1ES2. There were no comments or questions. Peggy Esquibel Reed-Qwest then noted that the last call was held on

January 11th and its purpose was to start the discussions regarding the PCAT Impacts Matrix and getting items in the appropriate buckets in order to proceed and move forward. There were some CLECs on that call who were not comfortable discussing the Matrix without obtaining input from their regulatory folks so that discussion had to be rescheduled and that is why we are meeting today. Details of that January 11 call are in the meeting minutes of the CR, in case you have not yet had the opportunity to read them. Peggy then stated that this brings us all up to date and that today's discussion would be started by Cindy Buckmaster (Qwest). Doug Denney-Eschelon asked for the meaning of the terms going forward and proceeding. Peggy Esquibel Reed-Qwest stated that we would like to move forward with the open dialogue and the discussion on the moving of the bucketed items in the appropriate place on the PCAT Impacts Matrix. Cindy Buckmaster-Qwest stated that our intent is to identify all product documentation associated with TRO TRRO that are impacted by law. Cindy stated that a list was compiled and that it is separated into sections, the first section identified items that were already introduced, in 2005. Cindy stated that the 2nd list is the products with changes that were postponed and removed from the initial effort of PC102704-1ES. Cindy noted that those products were moved to Category 2. Cindy stated that the 3rd set is yet to be introduced and that no discussions have yet taken place for them. Cindy then stated that the last set is those products that are currently in litigation. Cindy noted that the 4th set is a subset of the 2nd bucket. In the last meeting there was a concern regarding litigation and a desire to have identified where changes have been made in the catalogues. Qwest's intent is not to usurp litigation and noted that these discussions are so all know what to expect if have signed TRRO agreement. Cindy then noted that at the last call, the CLECs said that they wanted to bring their regulatory/legal people on the call in order to help identify the items, in the buckets, that should be moved to bucket 4. Cindy stated that the intent is then to discuss items that are not in bucket 4, or are in bucket 4, with the CLECs that want to discuss them. Doug Denney-Eschelon stated that there are a lot of assumptions on how processes apply to each CLECs ICAs. Doug noted that the wire center litigation is one example. Cindy Buckmaster-Qwest stated that these discussions have been for the entire CLEC Community and Qwest is happy to let the CLECs structure the calls. Cindy stated that Qwest has no pre-conceived notion of what will or will not be discussed. Cindy stated that Qwest would discuss what the CLECs want to discuss. Cindy then stated that Qwest would take feedback as to what additional items need to be moved into Bucket 4, if the CLECs want to share that information. Karen Clausen-Eschelon stated that an assumption, in the Matrix, is that if you want to talk about it, the discussion starts with the non-TRRO PCATs. Karen stated that was her observation. Karen then noted that Eschelon had provided the list of items that are in litigation to Qwest and stated that Qwest needs to tell them what is in litigation. Cindy Buckmaster-Qwest stated that she is neither in legal nor in the regulatory group. Cindy then stated that she would not force discussions and would discuss what the CLECs want to discuss. Cindy stated that the starting place could be the PCATs Impact Matrix and the documents on the main web site, www.qwest.com. Cindy stated that we could also discuss the changes that were made for the TRRO web site. Steve Fisher-Integra stated that every PCAT that is related to TRRO is far reaching. Steve then asked that if a PCAT is related to TRRO and there are ICA negotiations occurring, why the PCATs had so much relationship to the ICAs. Cindy Buckmaster-Qwest stated that the PCATs contain a general description and the flow of a product. Cindy stated that this is how to do business to business. The contracts are not intended to carry the detail of business to business relationships. Steve Fisher-Integra stated that the new PCATs are far reaching into TRRO and are not product specific. Steve stated that we are blurring the distinction between the ICA and the PCAT and there needs to be discussion. Karen Clausen-Eschelon stated that she disagrees with what was just said and stated that it was asked that issues be brought into negotiations. Karen stated that Qwest is trying to draw a distinct line and that some issues do belong in contracts. Karen then stated that in the CMP Document, the scope will sometimes overlap with an ICA and states that the ICA will have control. Karen then stated that she agreed with Integra and that Qwest should negotiate that. Karen Clausen-Eschelon then noted that Cindy (Buckmaster-Qwest) was not regulatory and that Cindy had asked CLEC regulatory personnel to be present on this call. Karen then asked if there was Qwest legal representation on the call. Cindy

Buckmaster-Qwest stated that she did not request that CLEC regulatory or legal personnel be on the call, the CLECs said that they wanted regulatory and/or legal folks on the call. Karen Clausen-Eschelon stated that they had already identified that all products are in litigation. Cindy Buckmaster-Qwest asked that for bucket 1, which includes UBS and UNE-P, if anybody believes that these products are in litigation. Cindy then stated that Qwest believes that these have been completed. Cindy asked if anyone disagreed that they have been completed. Doug Denney-Eschelon stated that Qwest has filed a tariff, in Colorado, to amend SGATs and noted that this is part of that filing and that investigation is suspended. Cindy Buckmaster-Qwest stated that if we were to take that approach then we could never have a CMP call due to changes to the tariff and/or SGAT. Cindy stated that could be pushing the envelope and that this call was for discussion of PC102704-1ES/-1ES2 ONLY. Karen Clausen-Eschelon stated that if Qwest had read what they submitted the day before, that PC102704-1ES/-1ES2 should be left in bucket A. Cindy Buckmaster-Qwest stated that the matrix is to identify all products that are impacted by TRRO. Cindy then noted that she saw, in the email, that Eschelon agrees that those items are closed. Cindy then stated that we have not heard from the other CLECs as to the completion on March 18, 2005, for the items in bucket A. Cindy asked if all on the call agree that all items in bucket a are closed. Steve Fisher-Integra stated that if you go into UBS PCAT, there are links that are in the PCATs that link to other documents that might not yet be closed. Steve stated that he would be hesitant to agree that bucket A is closed due to those links to the other documents. Cindy Buckmaster-Qwest stated that was a very good point and noted that the PCAT, as it specifically relates to UBS is closed. Cindy asked if all were in agreement that UBS is not offered by Qwest and asked if all agreed that UNE-P as identified on the matrix is not offered by Qwest. Karen Clausen-Eschelon asked Cindy (Buckmaster-Qwest) if she was asking the CLECs to agree and comment. Cindy Buckmaster-Qwest said that she was only saying that the CR was closed in March 2005 and at that time CLECs had no issue with those items. Karen Clausen-Eschelon stated that Cindy was then asking two questions. Karen Clausen-Eschelon stated that yes, the CR was closed in March 2005 and agreed that all are not subject to TRRO. Karen stated that no items are open and noted that there is a fuzzy line. Karen stated that the question is if Qwest intend to make similar filings (tariffs in lieu of SGATs) in other states. She stated that she has asked that question a number of times, specifically asked it in a pre-meeting e-mail and expected it to be answered on this call. Cindy Buckmaster-Qwest stated that did not fall into her area of responsibility and noted that the question is not for this call. Cindy stated that this call is for the discussion of TRRO PCATs ONLY. Karen Clausen-Eschelon asked if Cindy (Buckmaster-Qwest) was going to find out who would answer her question. Cindy Buckmaster-Qwest said no and advised Karen (Clausen-Eschelon) that she would trust that Karen would obtain that information from one of the other avenues, within Qwest, that she has probably already asked. Karen Clausen-Eschelon stated that if Qwest's intent was to insult Eschelon that they had. Cindy Buckmaster-Qwest stated that it was not her intent to insult Eschelon and apologized. Cindy stated that she was not sure if there were filings in other states as that is not her decision or area of responsibility. Karen Clausen-Eschelon stated that she understood that Cindy (Buckmaster-Qwest) does not know the answer. Cindy Buckmaster-Qwest asked if there were any items in the third bucket, such as 800 data base query, that were involved in litigation. Karen Chandler Ferguson-Qwest stated that Qwest is not aware of any current arbitration or litigation that was occurring for items in that third bucket. Karen Clausen-Eschelon stated that Qwest had Eschelons written response and stated that she would not go thru the matrix again. Cindy Buckmaster-Qwest asked if there were any CLECs on the call that believed that items in that third bucket were in litigation or arbitration. Karen Clausen-Eschelon stated yes, for all items. Cindy Buckmaster-Qwest asked for input from other CLECs. McLeod agreed with Eschelon and stated that they were not in a position to discuss, due to negotiations. Integra stated that they echo McLeods comment. Karen Chandler Ferguson-Qwest stated that 800 data base is offered via the tariff and asked if it was in arbitration. McLeod said no and stated that they are moving from negotiations to arbitration. McLeod then stated that Qwest needs to give them the next steps. McLeod then stated that they have a confidentiality agreement. McLeod then stated that all products on the matrix fall under TRRO and that they need to protect McLeod. McLeod stated that they were not in a

position to discuss this now. Cindy Buckmaster-Qwest stated that the discussion has made it clearer and thanked the CLECs for their input. Karen Clausen-Eschelon stated that Eschelon has taken time to respond and noted that they have been more clear than Qwest. Karen Chandler Ferguson-Qwest apologized and stated that Eschelon did not want to respond further on this call and stated that McLeod's explanation did make it clearer. Karen Clausen-Eschelon stated that the law is taking something away and stated that all is subject to arbitration and litigation as to how and when this will be handled. Karen stated that all read an order that something has gone away and Qwest is now asking broad statements as to what is in arbitration and litigation. Cindy Buckmaster-Qwest asked if there was any CLEC on this call that is interested in discussing the changes for 800 database service. Karen Clausen-Eschelon asked what those changes were. Cindy Buckmaster-Qwest stated that she does not yet have the proposed changes and stated that what those changes will be is what needs to be discussed. Cindy stated that for bucket 2, the PCATs may be a starting place for the discussion and the same could be true for bucket 3. Karen Clausen-Eschelon stated that Eschelon will discuss in the ICA negotiations. Cindy Buckmaster-Qwest stated that she is hearing Eschelon saying that Eschelon does not want to discuss 800 data base. Karen Clause-Eschelon asked Cindy (Buckmaster-Qwest) to not recap what she said because she will disagree with Cindy's recap. Cindy Buckmaster-Qwest asked if there was any CLEC on the call that is interested in discussing 800 data base. Integra said no. Karen Clausen-Eschelon stated that it might be better to ask if any one was interested in discussing by bucket instead of by product. Cindy Buckmaster-Qwest asked if there was any CLEC that is interested in discussing bucket B. Karen Clausen-Eschelon asked if the discussion would be in the context of CMP. Cindy Buckmaster-Qwest said yes. Steve Fisher-Integra said no because TRRO is far reaching and he needs to know what the PCAT changes are. Steve stated that the PCATs needed to be slimmed down. Cindy Buckmaster-Qwest stated that the matrix identifies by product and has a link to the PCAT in column C. Cindy asked the CLECs to help her understand how they want the PCATs slimmed down. Steve Fisher-Integra stated that the product descriptions are too far reaching and stated that the content copied from the Contract should not be in a PCAT, it should be in the ICAs. Karen Chandler Ferguson-Qwest stated that everyone's PCAT could then be different and stated that the CLECs contracts do govern how Qwest does business with your business. Karen stated that the PCATs could be general and that each individual contract would govern. Steve Fischer-Integra stated that it would need to be negotiated between two parties and stated that the CLECs would not have to agree on them. Steve stated that the PCAT dictates how Qwest deals with a CLEC and stated that is what they are disagreeing with. Cindy Buckmaster-Qwest asked if that is different then how they deal with Verizon, BellSouth, or AT&T, for example. CLEC said yes and noted that if they do not agree, they file changes and/or disputes. McLeod stated that they did not like the idea of committing now and discussing generically. McLeod noted that they may not have any issues now but that they might have issues later and does not want to have to go through CMP later because of TRO/TRRO arbitration. Cindy Buckmaster-Qwest thanked McLeod for the input and then asked if there was any CLEC under a TRRO amendment, not in litigation, that is interested in discussing in CMP, these items. No response. Cindy Buckmaster-Qwest asked if the silence meant no. Colette Davis-Covad stated that Covad has signed TRRO agreements with Qwest and stated that any changes that Qwest is proposing, with Covad, needs to be in CMP. Colette noted that she also handles BellSouth and Sprint in the same manner. Colette stated that if an ILEC wants to make changes to a process, it is evaluated. Colette stated that if something is in arbitration, it is then between that CLEC and Qwest. Colette stated that proceeding forward is also important. Colette stated that, from one side, she can see what everyone on the call is saying and on the other side, we need to move forward and see what Qwest recommends and challenge via CMP if need to. Colette stated that if there is a disagreement related to changes in requirements, CLECs can then file a complaint or go into mediation or arbitration for an issue. Colette stated that we need to collaboratively move forward and stated that the CLECs need to arbitrate independently of CMP and that mixing the two together is a problem and why we come to a crossroad. Colette stated that not all CLECs are arbitrating the same thing and noted that Covad's position is a collaborative position. TRRO or CMP will go through proper channels and if

the CLECs need to challenge Qwest's position, they can go to the FCC or the PUC. Colette stated that she is trying to get a better sense of what the CLECs want out of this call. Karen Clausen-Eschelon stated that Qwest asked Regulatory and Legal reps to come to the call. Karen stated that the CMP document says that there could be overlap with CMP and the contracts and that the ICAs would have control. The problem is when things are in an ICA when discussing TRRO and Qwest is trying to move forward in CMP and negotiations for ICAs could be an issue. Karen stated that if Qwests purpose is to remove products from the PCATs, it clearly belongs in an ICA and the ICA does control. Karen stated that they were asked what was in litigation and Qwest doesn't have their people on the call. Karen stated that they are being asked to agree and commit and she is asking agree to what. Colette Davis-Covad stated that with CMP, it gets down to a granular change and that is where it needs to be evaluated. Colette stated that if there is a process that needs to be changed, generally an ICA does not rule, where there is a contract change, the ICA does rule. Steve Fisher-Integra stated that the issue is that a process is in a PCAT. Cindy Buckmaster-Qwest stated that the intent of the PCAT is to contain general information about the product and further define the how-to (for process purposes). Steve Fisher-Integra stated that if he needs to find out if he can have Inter Office Transport, he would go to his ICA to see if he can have it and that the PCAT would tell him how. Cindy Buckmaster-Qwest said Yes! That is the intent of the PCAT. The PCAT structure is such that it begins with a general description of the product and then identifies more of the 'how to' about a product request. Cindy stated that Qwest wants the PCATs to be of value to the CLECs. Cindy noted that the ICAs do govern but that the PCATs should tell the CLECs how to submit an LSR. Steve Fisher-Integra asked Cindy to show him a PCAT that is showing him that. Cindy Buckmaster-Qwest stated that she would but that is not the purpose of this particular call. Colette Davis-Covad stated that is the gap, CMP addresses processes and procedures. Product availability is generally conrolled via an ICA. Colette stated that the PCAT is redundant with the ICA and asked why ICA language is in a PCAT. Colette stated that CMP should be focused on giving the CLECs ordering instructions. The FCC & PUC issue orders on what Qwest can and cannot provide to the CLECs. CMP should be focused on giving CLECs information on how to order products and services. The issue is that Qwest is putting ICA language in the PCATs and Qwest needs to stick to publishing how to order products. Jay Newsbom-Integra stated that they would not write the PCATs for Qwest and stated that Qwest is putting the cart before the horse in trying to write processes before the ICAs are done. Cindy Buckmaster-Qwest stated that she does not want to discuss processes with those CLECs who do not want to discuss. Cindy asked that in the next meeting, if we can get those who have already signed or who are about to sign, interested in discussing. Colette Davis-Covad stated that this should not impede the process on how to order out of a non-impaired wire center. Cindy Buckmaster-Qwest stated that Utah has already reviewed the wire center list and decided what is and what is not impaired. Cindy noted that they need that avenue to tell the CLECs how to order that product. Colette Davis-Covad stated that she does not see a problem. Karen Clausen-Eschelon stated that the PCATs on the matrix may be different than those telling me how to order. Karen stated that she believes that these conversations should occur in negotiations and stated that she will not be told to talk about it in CMP. Karen stated that the discussions need to be in negotiations. Karen stated that they were asked about legal issues that Qwest wants to remove from PCATs and that those are in arbitration and/or negotiations. Cindy Buckmaster-Qwest stated that there is no underlying intent, then asked if there were any CLECs who have signed or are about to sign, that want to discuss any item on the matrix, in CMP. Steve Fisher-Integra said not the way that they are currently structured. Cindy Buckmaster-Qwest stated that we can discuss and change the template, if this one is not of value, but proposed we get through the discussion of topics before PCAT format is discussed. Karen Clausen-Eschelon asked if Cindy (Buckmaster-Qwest) was offering to update the template in CMP. Cindy Buckmaster-Qwest said No, she is offering to update the matrix in CMP. She further stated that if any 'template' is to change via CMP it would be the PCAT template and not the Negotiations Template. Steve Fisher-Integra stated that he was not sure that it needed to be updated. Cindy Buckmaster-Qwest asked the CLECs to look at item #3 Line Sharing. Cindy stated that this was removed as a result of TRRO, is available in a Commercial Agreement, and proposed

changes have been made in the PCAT that have not yet been shared. Karen Clausen-Eschelon stated that was Qwests legal view and stated that Qwest could voluntarily offer it, under 251. Karen stated that Qwest needs to get their ducks in order before the PCATs can be updated. Cindy Buckmaster-Qwest stated that if we are talking to those who have signed, the horse is where it belongs, before the cart. Colette Davis-Covad stated that the operational details are not yet in the contract. Karen Clausen-Eschelon asked if it is Qwests position that the Commercial Agreement processes go through CMP. Cindy Buckmaster-Qwest stated that Line Sharing has not yet been addressed in any CMP CR and noted that changes that affect how to order it would be communicated via CMP (for example that you first have to have a Commercial Agreement). Steve Fisher-Integra stated that the Commercial Agreements are separate from this process. Karen Clausen-Eschelon asked if we had gone beyond the scope of this call. Cindy Buckmaster-Qwest said no, that the scope of this call is to determine if there is any CLEC interested in discussing items on a matrix. Cindy then noted that this call started with no structure in mind and stated that everything now seems to be in bucket 4. Cindy stated that process changes, the operational way we do work applies to all CLECs. The TRRO, and how it applies to CLECs, is what we want to discuss. Jay Newsbom-Integra asked why Qwest doesn't just send out the changes. Cindy Buckmaster-Qwest stated that the changes that have been made are already in bucket 2, such as EEL and LMC. Steve Fisher-Integra asked that everything that is in the ICA be taken out of the PCAT and for Qwest send the changes out to the CLECs. Cindy Buckmaster-Qwest asked that we discuss product related items. Colette Davis-Covad stated that this could interfere or compromise where Covad is, in their negotiations. Colette stated that process can be discussed; and legal positions are not to be discussed. Cindy Buckmaster-Qwest stated that process is what Qwest wants to discuss. Karen Clausen-Eschelon stated that the term 'process' is also in litigation. Karen then stated that she does not agree that process belongs in the PCAT, as opposed to a Commercial Agreement. Karen stated that she opposes using TRRO PCATs as a starting place, for discussions. Karen stated that Qwest is claiming that existing processes are to be discussed and that they need to edit PCATs before Qwest can send them out for review. Cindy Buckmaster-Qwest stated that Qwest is not attempting to force anything down anyone's throat. Cindy stated that she wants to talk to CLECs who want to discuss the items. Cindy asked if there would be value if we had another call. Steve Fisher-Integra stated that they want a call and don't want it to be structured. Cindy Buckmaster-Qwest stated that she was fine with that and asked the CLECs what the next call length should be. Karen Clausen-Eschelon stated that she only wanted to discuss the ICA negotiations. Susan Lorence-Qwest recommended that the next call be 2 hours because there are CLECs who do want to discuss. Susan then suggested that a PCAT be reviewed on that next call. Karen Clausen-Eschelon stated that Eschelon will not discuss issues that are in litigation. Cindy Buckmaster-Qwest stated that if a CLEC does want to discuss an item that is on the matrix, that is fine…they don't eed to come to the call. She stated she wants to have that discussion with CLECs who do want to discuss. Karen Clausen-Eschelon stated that she wanted a document that contains only the processes. Cindy Buckmaster-Qwest stated that she would not edit a PCAT without knowing what the CLECs want and what would be of value to them. Cindy noted that she did not want a separate copy, for Eschelon. Jay Newsbom-Integra stated that if Qwest does not provide a document, the next discussion will be the same as today's discussion. Cindy Buckmaster-Qwest stated that she does not know what the CLECs want in the PCATs or want to discuss. Jay Newsbom-Integra stated that Qwest heard their concerns; the ICA language in the PCATs, and he wants the PCATs edited down to processes and procedures. Cindy Buckmaster-Qwest stated that she would research the difference between other ILEC PCATs and Qwest's PCATs for one of her products if that would help the discussion move back to TRRO changes and doesn't plan to allow the discussion to be derailed by discussion about format of the PCAT. If that proves to be do-able before the next call, she will complete a re-write of that one PCAT. Jay Newsbom-Integra stated that they need to see how to do things. Cindy Buckmaster-Qwest stated that is how we will proceed. Cindy stated that proposed PCAT language would be provided at least 3 days prior to the next call. Cindy then noted that the next call would be scheduled for 2 hours. There were no additional comments or questions. The call was concluded. -- February 5, 2007 Email

Received From Eschelon: Peggy, Thank you for the response. We have asked specific questions and will look forward to Qwest's responses on the call. Bonnie Johnson Director Carrier Relations Eschelon Telecom Inc. -- February 5, 2007 Email Sent to Cbeyond: Tom, Your email below was received. The Ad Hoc call scheduled for tomorrow will continue to take place in order for the open dialog to continue and for Qwest to address CLEC concerns. If Cbeyond cannot attend the call, the meeting minutes will be posted to the CMP CR, for your future reference. Peggy Esquibel-Reed Qwest Wholesale CMP -- February 5, 2007 Email Sent to Eschelon: Bonnie, Your email below was received. The Ad Hoc call scheduled for tomorrow will continue to take place in order for the open dialog to continue and for Qwest to address CLEC concerns. Peggy Esquibel-Reed Qwest Wholesale CMP -- Email Received From Tom Hyde, Cbeyond: Cbeyond objects to the Ad-Hoc Meeting scheduled for 2/6/2007 as premature. Qwest has not yet furnished sufficient information to make the call meaningful. If Qwest decides to continue requesting a call on this issue with CLEC legal and regulatory personnel, Qwest should provide the necessary information, as well as Qwest's proposal(s), sufficiently in advance of any call so that CLECs and their attorneys and regulatory personnel may review the information and proposal and be prepared to respond. A call, if it is to be held, should be rescheduled until Qwest provides this information. Cbeyond may not be able to participate on tomorrow's call. Cbeyond reserves all of its rights -- February 5, 2007 Email Received From Bonnie Johnson, Eschelon SUBJECT: Information for tentative call tomorrow - CMPR.01.30.07.F.04487.TRROAdHocMeeting Qwest asked CLEC regulatory/legal personnel to answer questions regarding the status of litigation for each item on Qwest's matrix of the "buckets" in which Qwest placed certain products. Enclosed is Eschelon's response to Qwest's questions. Also enclosed is a copy of Qwest's matrix, with letters and row numbers added in the margin for ease of reference. (This numbering had to be added manually, as Qwest provided the document only in PDF format.) Please explain Qwest's reason and agenda for a call given that: (1) except for items that are completed (Bucket A), the items are in litigation (a fact known to Qwest, as Qwest is a party to each litigation), and Qwest's position is that "Disputed items will not immediately be processed through CMP," (2) Qwest has provided no proposal (see 12/14/06 minutes); and (3) Qwest needs to provide additional information (see Eschelon's Response to Bucket C) on the items that Qwest identifies as "Not Yet Covered in any CR." If Qwest continues to request a call on this issue and/or with CLEC legal/regulatory personnel, Qwest should provide the requested information, as well as Qwest's proposal, sufficiently in advance of any call so that CLECs and their attorneys/regulatory personnel may review the information and proposal and be prepared to respond. A call, if it is to be held, should be rescheduled until Qwest provides this information. Also, please indicate whether Qwest will initiate any proceeding/make any filing similar to its filing in Colorado Commission Docket No. 07S-028T (with respect to a tariff, SGAT, Qwest's template, etc.) in any other state. (Please either provide this information before any call or, if a call is held tomorrow and Qwest has not responded, please respond on the call.) If a call is held, Karen Clauson, an attorney and Sr. Director of Interconnection, will represent Eschelon on the call, per Qwest's request that CLECs bring legal representation to the call. In addition, Doug Denney, a witness familiar with issues in litigation, will participate as well. Eschelon reserves all of its rights. ATTACHMENT included with this Email: ESCHELON RESPONSE TO QWEST'S QUESTION AS TO WHICH ITEMS ON QWEST'S CHART ARE SUBJECT TO LITIGATION/ARBITRATION February 5, 2007 If a call is held, please add these comments to the meeting minutes for the call. If not, please add these minutes to the status history for the CR. (Please note that Qwest has inappropriately separated out the CR into two numbers, with one being followed by '-2', which creates the impression that there is no earlier status history, when there is additional information that is part of the history of events. Qwest needs to put them back together, so the single status history is complete.) Qwest CMP Minutes of 1/11/07 Ad Hoc Call: "Cindy Buckmaster-Qwest confirmed that the CLECs will take this information back. She said that she would still like to go through the matrix line-by-line in the next adhoc meeting. Cindy states that we need to ask two questions: 1) Is this in litigation and why, and 2) Can we get consensus if something is in litigation where we can move it on the list." -- See Eschelon responses below to each of these questions for each Qwest Bucket on Qwest's matrix. Qwest CMP Minutes of 11/15/06

Monthly Call: "Cindy said Qwest is asking to release the undisputed items, those not in arbitration or items being challenged under law. Disputed items will not immediately be processed through CMP." Qwest CMP Minutes of 12/14/06 Monthly Call: "Bonnie J-Eschelon stated that in regard to Qwest's proposal, she is hearing that Qwest does not really have one. Cindy B-Qwest stated that was correct." Minnesota Arbitrators' Report, Qwest-Eschelon ICA MN Arbitration, ¶¶21-22: "The CMP document itself provides that in cases of conflict between changes implemented through the CMP and any CLEC ICA, the rates, terms and conditions of the ICA shall prevail. In addition, if changes implemented through CMP do not necessarily present a direct conflict with an ICA but would abridge or expand the rights of a party, the rates, terms, and conditions of the ICA shall prevail. Clearly, the CMP process would permit the provisions of an ICA and the CMP to coexist, conflict, or potentially overlap. The Administrative Law Judges agree with the Department's analysis that any negotiated issue that relates to a term and condition of interconnection may properly be included in an ICA, subject to a balancing of the parties' interests and a determination of what is reasonable, non-discriminatory, and in the public interest. Eschelon has provided convincing evidence that the CMP process does not always provide CLECs with adequate protection from Qwest making important unilateral changes in the terms and conditions of interconnection." QWEST BUCKETS FROM QWEST'S CHART (enclosed) A = "Products/Processes Introduced on PC102704-1ES" B = "Products/Processes Postponed on PC102704-1ES" C = "Products/Processes Not Yet Covered on any CR" D = "Products Known to be in Arbitration/Litigation" NOTE: Eschelon disagrees with Qwest's characterizations, as further described in Eschelon's testimony in the Qwest-Eschelon ICA arbitrations. QWEST BUCKET A All nine of the items listed in Qwest Bucket A (A1-A9) deal with UNE-P. Qwest has indicated that items A1-A9 were completed in CMP. In addition, CLECs have signed amendments regarding elimination of UNE-P (at least some in conjunction with QPP), and the terms of those agreements control. Eschelon is not aware of pending litigation regarding UNE-P. As Qwest has said it intends to discuss which products or terms relating to its identified items are subject to litigation, if Qwest is a party to, or aware of, any pending litigation, Qwest should provide this information to CLECs (before a call, if any call is held). RESPONSE TO QWEST #1: Not in litigation to Eschelon's knowledge. RESPONSE TO QWEST #2: Leave in Bucket A and note in final column ("Notes"): "Completed in CMP." There is no need to "release the undisputed items" because they are completed. QWEST BUCKET B All eleven of the items in Qwest Bucket B (B10 - B20) are subject to litigation. Qwest repeats B(10), B(15), B(17), and B(18) in Qwest's Bucket D (which identifies these items as known to be in litigation). Qwest does not explain why it does not also include the other items, which are also in litigation (often in the same cases). See Colorado Commission Docket No. 07S-028T, The Investigation and Suspension of Tariff Sheets Filed by Qwest Corporation with Advice Letter No. 3058. See also Wire Center Dockets: AZ Docket Nos.T-03632A-06-0091; T-03267A-06-0091; T-04302A-06-0091; T-03406A-06-0091; T-03432A-06-0091; and T-01051B-06-0091; CO Docket No. 06M-080T; MN Docket Nos. P-5692, 5340, 5643, 5323, 465, 6422/M-06-211 and P-5692, 5340, 5643, 5323, 465, 6422/M-06-685; OR Docket No. UM 1251; UT Docket No. 06-049-40. See also Qwest-Eschelon ICA arbitrations: AZ T-03406A-06-0572, T-01051B-06-0572 CO 06B-497T MN P5340, 421/IC-06-768 OR ARB 775 UT petition not yet filed WA UT-063061 As Qwest has said it intends to discuss which products or terms relating to its identified items are subject to litigation, if Qwest is a party to, or aware of, any additional pending litigation, Qwest should provide this information to CLECs (before a call, if any call is held). RESPONSE TO QWEST #1: In litigation. RESPONSE TO QWEST #2: Move to Bucket D. QWEST BUCKET C All thirteen of the items in Qwest Bucket C (C21-C33) have related terms that is subject to approval before becoming effective in the Qwest-Eschelon ICA arbitrations and/or Colorado Docket No. 07S-028T. In addition, C31 (Reclassification of Terminations for UNE Conversions, APOTs) relates to open disputed language in the Qwest-Eschelon ICA arbitrations. For all thirteen of the items in Qwest Bucket C (C21-C32), Qwest identifies them as "not yet covered." Depending on what these items entail, additional issues could be subject to litigation. See Colorado Commission Docket No. 07S-028T, The Investigation and Suspension of Tariff Sheets Filed by Qwest Corporation with Advice Letter No. 3058. See also Qwest-Eschelon ICA arbitrations: AZ T-03406A-06-

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are not prepared to discuss legal issues. Tom Hyde-Cbeyond stated that they need their Regulatory people involved in these discussions. Jeff Sonnier-Sprint Nextel stated that he agreed with Eschelon and that their Regulatory people need to be involved. Cindy Buckmaster-Qwest said that we could arrange a call with their Regulatory people or the CLECs could take this information to their Regulatory Teams for review and bring back to discuss in an adhoc meeting. Bonnie Johnson-Eschelon stated that Eschelon's position when Qwest introduced this CR and looking at the escalation from Covad that the introduction of TRO is considered a change of law and that some are done in Commission Oversight or in negotiations. She said that CMP is not the appropriate area to discuss because this is a change of law. Bonnie said that in June of 2005, Qwest said that they were updating SGATs and that the PCATs should be updated appropriately. Cindy Buckmaster-Qwest stated that we are in between two different circumstances. She said that the CR was introduced to make a process change to align with the law and that there is no other way to do this except in CMP. Bonnie Johnson-Eschelon said that the operations people don't take part in the Wire Center hearings and the discussion in those hearings are done at a high level with little detail. She said that they have been clear that they are trying to negotiate in the Interconnect Agreement. Bonnie reiterated that she is on the operations side and not an attorney. Cindy Buckmaster-Qwest stated that the Interconnect Agreement does not cover process and process was never part of the Commission Oversight. Bonnie Johnson-Eschelon stated that if you read their proposal, that we are back to square one and that we are talking about an interpretation of orders. Bonnie said that she does not believe that CMP is appropriate arena to discuss Cindy Buckmaster-Qwest stated that she was very clear when we talked in the Monthly CMP Meeting that this was our intent. She said that she would like to take a vote from the CLECs on the call to determine if everyone agrees that these items can be discussed today. Bonnie Johnson-Eschelon stated that Qwest did not want to talk about items in litigation. Cindy Buckmaster-Qwest said that we are not here to override the FCC or State level. She said that we want to communicate processes associated with TRO. Cindy said that 8 items were implemented on March 18, 2004 Bonnie Johnson-Eschelon said that those associated with UNE-P were completed with the Commission Oversight. Tom Hyde-Cbeyond stated that the effective dates are confusing on the matrix. Cindy Buckmaster-Qwest stated that the algorithm was adding a 1 to the date and that we will get that corrected. Bonnie Johnson-Eschelon stated that she thought they made it clear in the CMP meeting and in the minutes and that Qwest agreed that these items were in litigation and would not be discussed. Cindy Buckmaster-Qwest stated that we are not here to override any topics outside of litigation. She said that there is no hidden agenda and that she thought we made our intent very clear. Cindy stated that there are more CLECs that have signed up to do business with Qwest under the TRRO. She said that the reason we delayed was because TRO was in an appeal status. She said we want to provide the process for those CLECs doing business with us or for those who will be. She also said that she would challenge that there are items on the list that nobody cares about. She stated that all we want to do is put a note in the column for example that this item is in litigation. Bonnie Johnson-Eschelon stated once again that the people on the phone don't know that answer. Cindy Buckmaster-Qwest asked if there was consensus that we can't discuss this topic. Sue Wright-XO Communications stated that they do not have the answers and can't discuss. Tom Hyde-Cbeyond stated that if something is in litigation they can't discuss the process on items not yet decided on. Bonnie Johnson-Eschelon stated that was her concern at CMP and should have made her concern clearer. Sue Wright-XO Communications stated that they might not be in litigation but someone else may be. Tom Hyde-Cbeyond stated that he is not tapped to testify. Lynn Hankins-Covad said that Covad is not prepared to discuss this either and that she reviewed the CR and is not completely sure of what Qwest is trying to do. Ken Black-McLeod stated that McLeod is not up to speed either. Cindy Buckmaster-Qwest stated that we have consensus and that the CLECs will take this item to their Regulatory Teams for discussion. She said that is may be easier to have their Regulatory people attend the meetings. Jeff Sonnier-Sprint Nextel stated that the Regulatory people should sort this out. Sue Wright-XO Communications agreed. Bonnie Johnson-Eschelon also agreed and that they need to get their Regulatory Teams engaged. She said that she is not in a position to make that decision. Sue Wright-XO

Communications said that they might find that they don't want to discuss in CMP. Cindy Buckmaster-Qwest confimed that the CLECs will take this information back. She said that she would still like to go through the matrix line-by-line in the next adhoc meeting. Cindy stated that we need to ask two questions – 1) Is this in litigation and why, and 2) Can we get consensus if something is in litigation where can we move it on the list. Bonnie Johnson-Eschelon said that she thought we were going to discuss processes and that the TRO PCATs exist and that without CLEC input and that Qwest just changed unilaterally. Cindy Buckmaster-Qwest asked what processes Eschelon was referring to and that we have been discussing this topic for over a month. Bonnie Johnson-Eschelon asked what was being done with the PCATs and that Qwest has not been clear on what they are trying to do. Cindy Buckmaster-Qwest stated that this is not any different than any other CLEC CMP change. She said that we need to look at the number of CLECs operating under the new process, look at recommendations. She said that we need to determine if there any questions and go through step by step to make sure everyone understands. Cindy said that we need to set up a hierarchy of what to go through 1st Sue Wright-XO Communications asked if there was a Regulatory review prior to implementation. Cindy Buckmaster-Qwest stated that Regulatory always looks at the process changes if necessary. She said that regardless of the operating environment we try to implement with as little risk as possible. Tom Hyde-Cbeyond stated that he was looking at the PCATs on the website and does not see the proposed changes. Cindy Buckmaster-Qwest stated that is what we want to discuss. She said that EEL, for example, if you click on the link, you will see the TRRO version of the EEL PCAT. Tom Hyde-Cbeyond said that he missed the TRO PCAT on the website but he will review. Cindy Buckmaster-Qwest stated that it could be a matter of interpretation but that we just want to get the process communicated. Cindy Buckmaster-Qwest stated that the CLECs will bring information from their Regulatory Teams to the next adhoc meeting and that we will prioritize the list and discuss with those CLECs who are interested. Lynn Stecklein-Qwest asked for input on when the next meeting should be scheduled. Sue Wright-XO Communications asked if 2 weeks was enough time for the CLECs to contact their Regulatory people. Ken Black-McLeod stated that his contacts are out of the office until February. Bonnie Johnson-Eschelon stated that the week of February 5th looked good with the exception of the afternoons of February 6th and 7th. Lynn Stecklein-Qwest stated that a meeting would be scheduled sometime during that week.

<Back

Information Current as of 3/26/2007

From: Johnson, Bonnie J.
To: Johnson, Bonnie J.; [Qwest CMP email redacted]
Cc: Isaacs, Kimberly D.; Johnson, Bonnie J.
Subject: Information for tentative call tomorrow - CMPR.01.30.07.F.04487.TRRO_Ad_Hoc_Meeting
Sent: Mon 2/5/2007 2:23 PM
Attachments:


Escheloncommentson QwestBuckets.doc


QwestBuckets.pdf

Qwest asked CLEC regulatory/legal personnel to answer questions regarding the status of litigation for each item on Qwest's matrix of the "buckets" in which Qwest placed certain products. Enclosed is Eschelon's response to Qwest's questions. Also enclosed is a copy of Qwest's matrix, with letters and row numbers added in the margin for ease of reference. (This numbering had to be added manually, as Qwest provided the document only in PDF format.)

Please explain Qwest's reason and agenda for a call given that: (1) except for items that are completed (Bucket A), the items are in litigation (a fact known to Qwest, as Qwest is a party to each litigation), and Qwest's position is that "Disputed items will not immediately be processed through CMP," (2) Qwest has provided no proposal (see 12/14/06 minutes); and (3) Qwest needs to provide additional information (see Eschelon's Response to Bucket C) on the items that Qwest identifies as "Not Yet Covered in any CR." If Qwest continues to request a call on this issue and/or with CLEC legal/regulatory personnel, Qwest should provide the requested information, as well as Qwest's proposal, sufficiently in advance of any call so that CLECs and their attorneys/regulatory personnel may review the information and proposal and be prepared to respond. A call, if it is to be held, should be rescheduled until Qwest provides this information.

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Bonnie Johnson
Director Carrier Relations
Eschelon Telecom Inc.
[Contact information redacted]

ESCHELON RESPONSE TO QWEST'S QUESTION AS TO WHICH ITEMS ON QWEST'S CHART ARE SUBJECT TO LITIGATION/ARBITRATION

February 5, 2007

If a call is held, please add these comments to the meeting minutes for the call. If not, please add these minutes to the status history for the CR. (Please note that Qwest has inappropriately separated out the CR into two numbers, with one being followed by "-2," which creates the impression that there is no earlier status history, when there is additional information that is part of the history of events. Qwest needs to put them back together, so the single status history is complete.)

Qwest CMP Minutes of 1/11/07 Ad Hoc Call: "Cindy Buckmaster-Qwest confirmed that the CLECs will take this information back. She said that she would still like to go through the matrix line-by-line in the next adhoc meeting. Cindy states that we need to ask two questions: 1) Is this in litigation and why, and 2) Can we get consensus if something is in litigation where we can move it on the list."

-- *See* Eschelon responses below to each of these questions for each Qwest Bucket on Qwest's matrix.

Qwest CMP Minutes of 11/15/06 Monthly Call: "Cindy said Qwest is asking to release the undisputed items, those not in arbitration or items being challenged under law. Disputed items will not immediately be processed through CMP."

Qwest CMP Minutes of 12/14/06 Monthly Call: "Bonnie J-Eschelon stated that in regard to Qwest's proposal, she is hearing that Qwest does not really have one. Cindy B-Qwest stated that was correct."

Minnesota Arbitrators' Report, Qwest-Eschelon ICA MN Arbitration, ¶¶21-22: "The CMP document itself provides that in cases of conflict between changes implemented through the CMP and any CLEC ICA, the rates, terms and conditions of the ICA shall prevail. In addition, if changes implemented through CMP do not necessarily present a direct conflict with an ICA but would abridge or expand the rights of a party, the rates, terms, and conditions of the ICA shall prevail.[1] Clearly, the CMP process would permit the provisions of an ICA and the CMP to coexist, conflict, or potentially overlap. The Administrative Law Judges agree with the Department's analysis that any negotiated issue that relates to a term and condition of interconnection may properly be included in an ICA, subject to a balancing of the parties' interests and a determination of what is reasonable, non-discriminatory, and in the public interest. Eschelon has provided convincing evidence that the CMP process does not always provide CLECs with adequate protection from Qwest making important unilateral changes in the terms and conditions of interconnection."

[1] Ex. 1 (Albersheim Direct) at RA-1, part 1.0, page 15.

QWEST BUCKETS FROM QWEST'S CHART (enclosed)

A = "Products/Processes Introduced on PC102704-1ES"
B = "Products/Processes Postponed on PC102704-1ES"
C = "Products/Processes Not Yet Covered on any CR"
D = "Products Known to be in Arbitration/Litigation"

NOTE: Eschelon disagrees with Qwest's characterizations, as further described in Eschelon's testimony in the Qwest-Eschelon ICA arbitrations.

QWEST BUCKET A

All nine of the items listed in Qwest Bucket A (A1 – A9) deal with UNE-P. Qwest has indicated that items A1-A9 were completed in CMP.[2] In addition, CLECs have signed amendments regarding elimination of UNE-P (at least some in conjunction with QPP), and the terms of those agreements control. Eschelon is not aware of pending litigation regarding UNE-P. As Qwest has said it intends to discuss which products or terms relating to its identified items are subject to litigation, if Qwest is a party to, or aware of, any pending litigation, Qwest should provide this information to CLECs (before a call, if any call is held).

RESPONSE TO QWEST #1: Not in litigation to Eschelon's knowledge.
RESPONSE TO QWEST #2: Leave in Bucket A and note in final column ("Notes"): "Completed in CMP." There is no need to "release the undisputed items" because they are completed.

QWEST BUCKET B

All eleven of the items in Qwest Bucket B (B10 - B20) are subject to litigation. Qwest repeats B(10), B(15), B(17), and B(18) in Qwest's Bucket D (which identifies these items as known to be in litigation). Qwest does not explain why it does not also include the other items, which are also in litigation (often in the same cases).

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AZ Docket Nos.T-03632A-06-0091; T-03267A-06-0091; T-04302A-06-0091; T-03406A-06-0091; T-03432A-06-0091; and T-01051B-06-0091; CO Docket No. 06M-080T; MN Docket Nos. P-5692, 5340, 5643, 5323, 465, 6422/M-06-211 and P-5692, 5340, 5643, 5323, 465, 6422/M-06-685; OR Docket No. UM 1251; UT Docket No. 06-049-40.

See also Qwest-Eschelon ICA arbitrations:

AZ T-03406A-06-0572, T-01051B-06-0572
CO 06B-497T

[2] Qwest provides a CMP effective date in the second to last column. In addition, the URLs provided in the third column do not use the term "TRRO," as do the non-CMP TRRO PCAT URLs in other columns.

MN P5340, 421/IC-06-768
OR ARB 775
UT petition not yet filed
WA UT-063061

As Qwest has said it intends to discuss which products or terms relating to its identified items are subject to litigation, if Qwest is a party to, or aware of, any additional pending litigation, Qwest should provide this information to CLECs (before a call, if any call is held).

RESPONSE TO QWEST #1: In litigation.
RESPONSE TO QWEST #2: Move to Bucket D.

QWEST BUCKET C

All thirteen of the items in Qwest Bucket C (C21 – C33) have related terms that is subject to approval before becoming effective in the Qwest-Eschelon ICA arbitrations and/or Colorado Docket No. 07S-028T. In addition, C31 (Reclassification of Terminations for UNE Conversions, APOTs) relates to open disputed language in the Qwest-Eschelon ICA arbitrations. For all thirteen of the items in Qwest Bucket C (C21 – C32), Qwest identifies them as "not yet covered." Depending on what these items entail, additional issues could be subject to litigation.

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FOR C(21)-C(30) & C(32)-C(33):
RESPONSE TO QWEST #1: In litigation.
RESPONSE TO QWEST #2: As "not yet covered" by Qwest, Qwest to provide (before a call, if any call is held) a written proposal identifying the changes it wants to make to the existing PCAT and indicating, for each change, whether all ICAs have been amended accordingly.

FOR C(31):
RESPONSE TO QWEST #1: In litigation.
RESPONSE TO QWEST #2: Move to Bucket D.

QWEST BUCKET D

All four of the items in Qwest Bucket D (D34 – D37) are subject to litigation, per Qwest's own inclusion of them in the bucket for "Products Known to be in Arbitration/Litigation." (Qwest provided no docket numbers. Eschelon has provided docket numbers below.) Qwest's list is incomplete (see above). For example, Qwest omits Commingled EELs (B19), Reclassification of Terminations for UNE Conversions (APOTs) (B19), Loop Mux Combination (B11), UCCRE (B13), TRRO compliance and transition procedures (B20) from its Bucket D, even those issues are clearly subject to litigation in the Qwest-Eschelon ICA arbitrations and wire center proceedings and are subject to change of law provisions requiring ICA terms (*see*, *e.g.*, TRRO ¶196).

See Colorado Commission Docket No. 07S-028T, The Investigation and Suspension of Tariff Sheets Filed by Qwest Corporation with Advice Letter No. 3058.

See also Wire Center Dockets:

AZ Docket Nos.T-03632A-06-0091; T-03267A-06-0091; T-04302A-06-0091; T-03406A-06-0091; T-03432A-06-0091; and T-01051B-06-0091; CO Docket No. 06M-080T; MN Docket Nos. P-5692, 5340, 5643, 5323, 465, 6422/M-06-211 and P-5692, 5340, 5643, 5323, 465, 6422/M-06-685; OR Docket No. UM 1251; UT Docket No. 06-049-40.

See also Qwest-Eschelon ICA arbitrations:

AZ	T-03406A-06-0572, T-01051B-06-0572
CO	06B-497T
MN	P5340, 421/IC-06-768
OR	ARB 775
UT	petition not yet filed
WA	UT-063061

As Qwest has said it intends to discuss which products or terms relating to its identified items are subject to litigation, if Qwest is a party to, or aware of, any additional pending litigation, Qwest should provide this information to CLECs (before a call, if any call is held).

RESPONSE TO QWEST #1: In litigation.
RESPONSE TO QWEST #2: Remain in Bucket D (Bucket D should also be expanded to include the items identified above as in litigation and belonging in Bucket D).

	Product	PCAT(s)/Business Procedure(s)	PCAT/Business Procedure URL	Date Presented in CMP	Notes
A	**Products/Processes Introduced on PC102704-1ES**				
1	Unbundled Network Element (UNE)-Switching (UBS)	Unbundled Network Element (UNE) - Switching (UBS) - V36.0	http://www.qwest.com/wholesale/pcat/unswitch.html	PC102704-1ES Presented 11/17/04 - Effective 3/18/05	
2	Unbundled Network Elements - Platform (UNE-P)-General Information	Unbundled Network Elements - Platform (UNE-P) - General Information - V65.0	http://www.qwest.com/wholesale/pcat/unep.html	PC102704-1ES Presented 11/17/04 - Effective 3/18/05	
3	Unbundled Network Elements - Platform (UNE-P) - Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI)	Unbundled Network Elements - Platform (UNE-P) - Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI) - V21.0	http://www.qwest.com/wholesale/pcat/unepisdnbri.html	PC102704-1ES Presented 11/17/04 - Effective 3/18/05	
4	Unbundled Network Elements - Platform (UNE-P) - Centrex	Unbundled Network Elements - Platform (UNE-P) - Centrex - V49.0	http://www.qwest.com/wholesale/pcat/unepcentrex.html	PC102704-1ES Presented 11/17/04 - Effective 3/18/05	
5	Unbundled Network Elements - Platform (UNE-P) - Public Access Lines (PAL)	Unbundled Network Elements-Platform (UNE-P) - Public Access Lines (PAL) - V20.0	http://www.qwest.com/wholesale/pcat/uneppal.html	PC102704-1ES Presented 11/17/04 - Effective 3/18/05	
6	Unbundled Network Elements - Platform (UNE-P) - Private Branch Exchange (PBX) Trunks	Unbundled Network Elements- Platform (UNE-P) - Private Branch Exchange (PBX) Trunks - V32.0	http://www.qwest.com/wholesale/pcat/unepppbx.html	PC102704-1ES Presented 11/17/04 - Effective 3/18/05	
7	Unbundled Network Elements - Platform (UNE-P) - Plain Old Telephone Service (POTS)	Unbundled Network Elements - Platform (UNE-P) - Plain Old Telephone Service (POTS) - V36.0	http://www.qwest.com/wholesale/pcat/unepppots.html	PC102704-1ES Presented 11/17/04 - Effective 3/18/05	
8	Unbundled Network Elements - Platform (UNE-P) - Digital Switched Service (DSS)	Unbundled Network Elements - Platform (UNE-P) - Digital Switched Service (DSS) - V32.0	http://www.qwest.com/wholesale/pcat/unepdss.html	PC102704-1ES Presented 11/17/04 - Effective 3/18/05	
9	Unbundled Network Elements -Platform (UNE-P) - Integrated Services Digital Network (ISDN) Primary Rate Interface (PRI)	Unbundled Network Elements - Platform (UNE-P) - Integrated Services Digital Network (ISDN) Primary Rate Interface (PRI) - V36.0	http://www.qwest.com/wholesale/pcat/unepisdnpri.html	PC102704-1ES Presented 11/17/04 - Effective 3/18/05	
B	**Products/Processes Postponed on PC102704-1ES**				
10	Enhanced Extended Loop (EEL)	TRRO/OFO - Enhanced Extended Loop (EEL) - V22.0	http://www.qwest.com/wholesale/pcat/trroeel.html	PC102704-1ES Presented 11/17/04 - Deferred	
11	Loop MUX Combination (LMC)	TRRO/OFO - Loop MUX Combination (LMC) - V18.0	http://www.qwest.com/wholesale/pcat/trrolmc.html	PC102704-1ES Presented 11/17/04 - Deferred And	
12	SubLoop - Feeder	TRRO/OFO - Sub - Loop - V4.0	http://www.qwest.com/wholesale/pcat/trrosubloop.html	PC102704-1ES Presented 11/17/04 - Deferred	
13	Unbundled Customer Controlled Rearrangement Element (UCCRE)	Unbundled Customer Controlled Rearrangement Element (UCCRE) - V4.0	http://www.qwest.com/wholesale/pcat/uccre.html	PC102704-1ES Presented 11/17/04 - Deferred	
14	Unbundled Dark Fiber (UDF)	TRRO/OFO - Unbundled Dark Fiber (UDF) - V5.0	http://www.qwest.com/wholesale/pcat/trroudf.html	PC102704-1ES Presented 11/17/04 - Deferred	
15	Unbundled Dedicated Interoffice Transport (UDIT)	TRRO/OFO - Unbundled Dedicated Interoffice Transport (UDIT) - V8.0	http://www.qwest.com/wholesale/pcat/trroudit.html	PC102704-1ES Presented 11/17/04 - Deferred	

	Product	PCAT(s)/Business Procedure(s)	PCAT/Business Procedure URL	Date Presented in CMP	Notes
16	Unbundled Loop - General Information	TRRO/OFO - Unbundled Local Loop - General Information - V10.0	http://www.qwest.com/wholesale/pcat/trrounloop.html	PC102704-1ES Presented 11/17/04 - Deferred	
17	Unbundled Loop - Digital Signal Level 1 (DS1) Capable Loop	TRRO/OFO - Unbundled Local Loop - Digital Signal Level 1 (DS1) Capable Loop - V9.0	http://www.qwest.com/wholesale/pcat/trrounloopds1.html	PC102704-1ES Presented 11/17/04 - Deferred	
18	Unbundled Loop - Digital Signal Level 3 (DS3) Capable Loop	TRRO/OFO - Unbundled Local Loop - Digital Signal Level 1 (DS1) Capable Loop - V9.0	http://www.qwest.com/wholesale/pcat/trrounloopds1.html	PC102704-1ES Presented 11/17/04 - Deferred	
19		TRRO – Commingling and Unbundled Network Elements - Combinations (UNE-C) V3.0 - Applies to All of the Above	http://www.qwest.com/wholesale/clecs/trrocommingunec.html	PROS.09.12.05.F.03236.TRRO_Login_Product_Page - Non-CMP	
20		TRRO Compliance and Transition Procedures - V3.0 - Applies to All of the Above	http://www.qwest.com/wholesale/clecs/trrocompliancetransition.html	PROS.01.18.06.F.03571.TRRO_Compl_Transition_V1 Non-CMP	
C	**Products/Processes Not Yet Covered by any CR**				
21	8XX Database Query Service	8XX Database Query Service - V5.0	http://www.qwest.com/wholesale/pcat/8xx.html		
22	Advanced Intelligent Network (AIN)	Advanced Intelligent Network (AIN) - V4.0	http://www.qwest.com/wholesale/pcat/ain.html		
23	CCSAC-SS7-Finished	Common Channel Signaling Access Capability (CCSAC)/Signaling System 7 (SS7) - Finished - V11.0	http://www.qwest.com/wholesale/pcat/ccsacss7.html		
24	CCSAC-SS7-Unbundled	Common Channel Signaling Access Capability (CCSAC)/Signaling System 7 (SS7) - Unbundled V14.0	http://www.qwest.com/wholesale/pcat/unccsacss7.html		
25	Customized Routing	Customized Routing - V13.0	http://www.qwest.com/wholesale/pcat/customrouting.html		
26	InterNetwork Calling Name (ICNAM)	InterNetwork Calling Name - V4.0	http://www.qwest.com/wholesale/pcat/icnam.html		
27	Line Information DataBase (LIDB)	Line Information DataBase (LIDB) - V5.0	http://www.qwest.com/wholesale/pcat/lidb.html		
28	Line Sharing	Line Sharing/Shared Loop - V28.0	http://www.qwest.com/wholesale/pcat/linesharing.html		
29	Local Interconnection Service (LIS)	Local Interconnection Service (LIS) - V15.0	http://www.qwest.com/wholesale/pcat/lis.html		
30	Shared Distribution Loop	Shared Distribution Loop - V16.0	http://www.qwest.com/wholesale/pcat/shareddistloop.html		
31		TRRO - Reclassification of Terminations for Unbundled Network Element (UNE) Conversions - V2.0	http://www.qwest.com/wholesale/pcat/trroreclassuneterm.html	PROS.07.21.06.F.04074.TRRO_Reclass_Termin_V1 - Non-CMP	
32	Unbundled Loop - OCN	Unbundled Local Loop - Optical Carrier Level n (OC	http://www.qwest.com/wholesale/pcat/unloopocn.html		
33	Unbundled Packe t Switching	Unbundled Packet Switching (UPS) - V15.0	http://www.qwest.com/wholesale/pcat/ups.html		
D	**Products Known to be in Arbitration/Litigation**				
34	Enhanced Extended Loop (EEL)	TRRO/OFO - Enhanced Extended Loop (EEL) -	http://www.qwest.com/wholesale/pcat/trroeel.html		

	Product	PCAT(s)/Business Procedure(s)	PCAT/Business Procedure URL	Date Presented in CMP	Notes
35	Unbundled Dedicated Interoffice Transport (UDIT)	TRRO/OFO - Unbundled Dedicated Interoffice Transport (UDIT) - V8.0	http://www.qwest.com/wholesale/pcat/trroudit.html		
36	Unbundled Loop - Digital Signal Level 1 (DS1) Capable Loop	TRRO/OFO - Unbundled Local Loop - Digital Signal Level 1 (DS1) Capable Loop - V9.0	http://www.qwest.com/wholesale/pcat/trrounloopds1.html		
37	Unbundled Loop - Digital Signal Level 3 (DS3) Capable Loop	TRRO/OFO - Unbundled Local Loop - Digital Signal Level 1 (DS1) Capable Loop - V9.0	http://www.qwest.com/wholesale/pcat/trrounloopds1.html		

Eschelon/Qwest email exchanges regarding Qwest closing PC102704-1ES and PC102704-1ES-2 titled Certain Unbundled Network Elements (UNE) Product Discontinuance

From: Johnson, Bonnie J.
Sent: Wednesday, March 28, 2007 5:06 PM
To: 'New Cr, Cmp'; cmpcr@qwest.com
Cc: Isaacs, Kimberly D.; Johnson, Bonnie J.
Subject: RE: Eschelon comments regarding Qwest closing PC102704-1ES and 1ES-2/Certain Unbundled Network Elements (UNE) Product Discontinuance

Eschelon continues to believe Qwest is not in compliance with CMP closing codes. Not all of the Change Request was completed, but Qwest appears to be treating it all as completed. More importantly, as Eschelon has said before, changes regarding TRRO are considered change in law and should be handled via negotiations and perhaps also in some type of forum, such as changes to the SGAT, where there is also Commission oversight.

Bonnie Johnson
Director Carrier Relations
Eschelon Telecom Inc.
Phone [Contact Information Redacted]
Fax [Contact Information Redacted]
Cell [Contact Information Redacted]
[Contact Information Redacted]

From: New Cr, Cmp [Contact Information Redacted]
Sent: Monday, March 26, 2007 11:41 AM
To: Johnson, Bonnie J.; cmpcr@qwest.com
Cc: Isaacs, Kimberly D.
Subject: RE: Eschelon comments regarding Qwest closing PC102704-1ES and 1ES-2/Certain Unbundled Network Elements (UNE) Product Discontinuance

Bonnie,

The CRs (PC102704-1ES and PC102704-1ES2 have been revised to indicate that some products were removed from the original CRs and that the effort for some of those products would occur via separate CRs. The products that were not removed from the CRs were the products that were completed, therefore the status of Completed would be appropriate. Withdrawal is not appropriate, as some of the products were completed and Defer would also not be appropriate as there is no more action for these specific Change Requests. The history continues to be retained on PC102704-1ES and PC102704-1ES2 and those CRs continue to be available via the Interactive Reports on the Qwest Wholesale web site. None of the documentation has been or will be lost. The email below has been added to PC102704-1ES2, as requested.

Peggy Esquibel-Reed
Qwest Wholesale CMP

From: Johnson, Bonnie J. [Contact Information Redacted]
Sent: Friday, March 23, 2007 11:49 AM
To: Bonnie Johnson; cmpcr@qwest.com
Cc: Isaacs, Kimberly D.; Johnson, Bonnie J.
Subject: Eschelon comments regarding Qwest closing PC102704-1ES and 1ES-2/Certain Unbundled Network Elements (UNE) Product Discontinuance

Eschelon's position has not changed regarding PC102704-1ES and 1ES-2. Changes regarding TRRO are considered change in law and should be handled via negotiations or in some type of forum, such as changes to the SGAT, where there is Commission oversight.

In addition, the CR is not completed so a status of complete is not appropriate. Will Qwest be withdrawing or deferring this CR?

Please add this comment to the CR before changing the status.

Thanks,

Bonnie Johnson
Director Carrier Relations
Eschelon Telecom Inc.
Phone [Contact Information Redacted]
Fax [Contact Information Redacted]
Cell [Contact Information Redacted]
[Contact Information Redacted]

Eschelon-Qwest email exchange and excerpts from the attached document regarding Qwest's March CMP meeting minutes and Eschelon's red line of those minutes for discussion about PC102704-1ES and PC102704-1ES-2

QWEST REQUEST FOR REVIEW OF CMP MONTHLY MEETING MINUTES

From: Stecklein, Lynn [Contact Information Redacted]
Sent: Tuesday, March 27, 2007 2:16 PM
To: Isaacs, Kimberly D.; Fredricksen, Laurie (Integra); Sonnier, Jeff J [NTK]; annelyn.aficial (CGI)[Contact Information Redacted]; Bilow, Joyce E.; heatherk (BBC)[Contact Information Redacted]; Hines, Leilani J; Davis, Colette; jnelson(Popp)[Contact Information Redacted]; pamela; DC (AT&T)[Contact Information Redacted]
Cc: Esquibel-Reed, Peggy
Subject: ACTION REQUIRED: March Prod/Proc & Systems Meeting Minutes for Review & Feedback

Good Afternoon,

I have attached the minutes from the March Product/Process and Systems CMP Meetings. Please review the documents to ensure that your comments were captured accurately. Please provide your proposed changes no later than 5:00 p.m. DST, Friday, March 30, 2007. Please track your changes.

Thank you,

Lynn Stecklein

Qwest Wholesale CMP


CMPMeetingMinutesPP2007-03-21.doc


CMPMeetingMinutesSystems2007-03-21.dc

EXCERPTS FROM THE ENCLOSURES TO QWEST'S REQUEST

"PC102704-1ES CR 1: New Revised title effective 1/11/05: Certain Unbundled Network Elements (UNE) Product Discontinuance (see Description of Change for previous title) CR 2 = PC102704-1ES2

PC102704-1ES CR 2: New Revised title effective 1/11/05: Certain Unbundled Network Elements (UNE) Product Discontinuance (see Description of Change for previous title) CR 1 = PC102704-1ES

Mark Coyne-Qwest stated that these are the two TRRO CRs that were opened a few years ago. Mark then stated that based on the discussion at the February CMP Meeting, where Qwest acknowledged that the effort was moving forward with individual CRs, Qwest is moving to close these two CRs. Mark stated that all the history and notes will be retained and are available via the interactive reports on the web site. Mark stated that none of the information would be lost and

asked if there was any objection to the closure of PC102704-1ES and PC102704-1ES2. There were no objections to the closure of the two CRs."

ESCHELON RESPONSE TO QWEST'S REQUEST FOR REVIEW OF CMP MONTHLY MEETING MINUTES

From: Isaacs, Kimberly D.
Sent: Tuesday, March 27, 2007 5:20 PM
To: 'Stecklein, Lynn'; Fredricksen, Laurie (Integra); Sonnier, Jeff J [NTK]; annelyn.aficial (CGI)[Contact Information Redacted]; Bilow, Joyce E.; heatherk (BBC)[Contact Information Redacted]; Hines, Leilani J; Davis, Colette; jnelson(Popp)[Contact Information Redacted]; pamela; DC (AT&T)[Contact Information Redacted]
Cc: Esquibel-Reed, Peggy; Johnson, Bonnie J.
Subject: RE: ACTION REQUIRED: March Prod/Proc & Systems Meeting Minutes for Review & Feedback

Attached are Eschelon's changes to the Product Process meeting minutes.

Kim Isaacs
Eschelon Telecom, Inc.
ILEC Relations Process Specialist
Ph: [Contact Information Redacted]
Fax: [Contact Information Redacted]
Email: [Contact Information Redacted]

CMPMeetingMinutesPP2007-03-21 (3).doc

EXCERPTS FROM THE ENCLOSURES TO ESCHELON'S RESPONSE

"PC102704-1ES CR 1: New Revised title effective 1/11/05: Certain Unbundled Network Elements (UNE) Product Discontinuance (see Description of Change for previous title) CR 2 = PC102704-1ES2

PC102704-1ES CR 2: New Revised title effective 1/11/05: Certain Unbundled Network Elements (UNE) Product Discontinuance (see Description of Change for previous title) CR 1 = PC102704-1ES

Mark Coyne-Qwest stated that these are the two TRRO CRs that were opened a few years ago. Mark then stated that based on a number of meetings and ~~the~~ discussions including a discussion at the February CMP Meeting, where Qwest acknowledged that the effort was moving forward with individual CRs, Qwest is moving to close these two CRs. Mark stated that all the history and notes will be retained and are available via the interactive reports on the web site. Mark stated that none of the information would be lost ~~and asked if there was any objection to the closure of PC102704-1ES and PC102704-1ES2. There were no objections to the closure of the two CRs.~~"

QWEST NON-CMP TRRO PCATS AS OF March 9, 2007

1. **TRRO/OFO - Loop MUX Combination (LMC) - V18.0**[1]
   http://www.qwest.com/wholesale/pcat/trrolmc.html
   History Log:
   http://www.qwest.com/wholesale/downloads/2006/061113/HL_TRRO-LoopMuxCombinationLMC_V18.doc

2. **TRRO - Reclassification of Terminations for Unbundled Network Element (UNE) Conversions – V2.0**
   http://www.qwest.com/wholesale/pcat/trroreclassuneterm.html
   History Log:
   http://www.qwest.com/wholesale/downloads/2006/060907/HL_Reclassification_TerminationV2.doc

3. **TRRO/OFO - Unbundled Local Loop - Digital Signal Level 1 (DS1) Capable Loop – V10.0**
   http://www.qwest.com/wholesale/pcat/trrounloopds1.html
   History Log:
   http://www.qwest.com/wholesale/downloads/2007/070115/HL_TRRO-UBL-DS1-V10.doc

4. **TRRO/OFO - Unbundled Dedicated Interoffice Transport (UDIT) – V8.0**
   http://www.qwest.com/wholesale/pcat/trroudit.html
   History Log
   http://www.qwest.com/wholesale/downloads/2006/061113/HL_TRRO-UDIT_V8.doc

5. **TRRO - Field Connection Point (FCP)/Cross-Connect Collocation - V2.0**
   http://www.qwest.com/wholesale/pcat/trrofcpcrossconnect.html
   History Log:
   http://www.qwest.com/wholesale/downloads/2006/060602/HL_TRRO_FCP-CrossConnect_V2.doc

6. **TRRO/OFO - Sub - Loop – V5.0**
   http://www.qwest.com/wholesale/pcat/trrosubloop.html
   History Log:
   http://www.qwest.com/wholesale/downloads/2007/070115/HL_TRRO_Sub-Loop_V5.doc

[1] "V" = "Version" number. Each time Qwest changes a TRRO PCAT via a non-CMP notification, the version number of the PCAT increases by one. Version 18 + Version 2 + Version 10 + Version 8 + Version 2 + Version 5 + Version 7 + Version 22 + Version 5 + Version 10 + Version 3 + Version 3 = 95 Versions (as of March 9, 2007).

7. **TRRO/OFO - Unbundled Local Loop – Digital Signal Level 3 (DS3) Capable Loop – V7.0**
   http://www.qwest.com/wholesale/pcat/trrounloopds3.html
   History Log:
   http://www.qwest.com/wholesale/downloads/2006/061109/HL_TRRO-UBL-DS3-V7.doc

8. **TRRO/OFO - Enhanced Extended Loop (EEL) - V22.0**
   http://www.qwest.com/wholesale/pcat/trroeel.html
   History Log:
   http://www.qwest.com/wholesale/downloads/2006/061113/HL_TRRO_EnhancedExtendedLoop-EEL_V22.doc

9. **TRRO/OFO - Unbundled Dark Fiber (UDF) – V5.0**
   http://www.qwest.com/wholesale/pcat/trroudf.html
   History Log:
   http://www.qwest.com/wholesale/downloads/2006/061013/HL_TRRO-Unbundled_Dark_FiberUDF_V5.doc

10. **TRRO/OFO - Unbundled Local Loop - General Information – V10.0**
    http://www.qwest.com/wholesale/pcat/trrounloop.html
    History Log:
    http://www.qwest.com/wholesale/downloads/2006/061109/HL_TRRO-UBL-GeneralInformation-V10.doc

11. **TRRO – Commingling and Unbundled Network Elements - Combinations (UNE-C) V3.0**
    http://www.qwest.com/wholesale/clecs/trrocommingunec.html
    History Log:
    http://www.qwest.com/wholesale/downloads/2006/061002/HL_TRRO-Commingling-UNE-C-V3.doc

12. **TRRO Compliance and Transition Procedures - V3.0**

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

    History Log:
    http://www.qwest.com/wholesale/downloads/2006/060414/HL_TRRO_Compliance_and_Transition_Procedure_V3.doc