Attachment To AT&T's Response
To WA Bench Request No. 34

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of	)	
	)	Docket No. UT-033044
QWEST CORPORATION	)	
	)	
To Initiate a Mass-Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order	)	AT&T'S COMMENTS AND COUNTER PROPOSALS ON QWEST'S BATCH HOT CUT PROPOSAL

AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services on behalf of TCG Seattle and TGC Oregon (collectively "AT&T") submit the following comments and counter proposals to Qwest Corporation's ("Qwest") batch hot cut proposal.

I. INTRODUCTION

Fundamentally, every time a hot cut is performed, an incumbent local exchange carrier ("ILEC") technician must physically disconnect the customer's loop from the current carrier's switch and reconnect it to the new provider's network. Those same manual, loop-by-loop activities must be performed whether they are done for one customer or for a batch of customers. Qwest's proposal does nothing to change those fundamental facts. Instead, Qwest's proposal reinforces why the FCC found the hot cut process was a source of operational impairment and why the Federal Communications Commission ("FCC"): concluded that ILECs must offer competitive local exchange carriers ("CLECs") access to mass market switching.

That is not to say that AT&T is uninterested in having Qwest improve its current hot cut process. Any proposal that seeks to improve the efficiency, capacity, quality and

cost of the current individual hot cut process is a welcome step in the right direction. However, based on AT&T's review, Qwest's proposal is but a very small step in what may prove to be a long journey to get agreement on a batch hot cut process that the Commissions and the CLECs can support and meets the FCC's requirements. AT&T believes Qwest's proposal falls far short of curing the operational and economic impairments that exist with the current hot cut process.

AT&T finds Qwest's proposal to be either short on essential details or outright deficient in a number of critical areas such as cost, quality of service to the end user, scalability and functionality. As an initial matter, there are certain key principles that must be followed during the batch hot cut collaborative. The first key principle is that any process changes must consider the impact on Qwest, the CLEC(s)[1] and the CLEC's customer. For example, a process change that reduces Qwest's cost by $1.00 but increases a CLEC's cost by $2.00 is a change that should not be made. Qwest should not be the only party considered in the batch hot cut process design. A second key principle is that any process changes must consider the effect on all of the critical hot cut characteristics. For example, a change that reduces a cost but also increases the frequency of customer outages should not be made. Changes should not be viewed in isolation but should be viewed as part of the overall process. Unfortunately, many of Qwest's proposed changes fail to consider all of the affected parties or suboptimize one element at the expense of another. The following describes AT&T's primary concerns with each of these key areas. As AT&T better understands Qwest's proposal, it reserves the right to raise other concerns.

[1] Multiple CLECs will be involved for the migration of an unbundled loop from one CLEC's switch to another.

II. AT&T's CONCERNS

A. Cost of a Hot Cut

On page 3 of its proposal Qwest admits that it has not yet completed its detailed cost studies; however, they state "it appears that in **virtually every instance** these efficiencies will reduce Qwest's cost of performing a batch hot cut." Emphasis added. Qwest goes on to state on page 15 that "the batch conversion process that Qwest proposes above will yield significant additional efficiencies and in **most** states the CLEC community can expect to experience a significantly reduced rate." Emphasis added. The Commissions and the CLECs cannot rely on vague statements such as these to get a sense of whether Qwest's batch hot cut rates will even begin to address the economic impairment concerns expressed by the FCC in the Triennial Review Order ("TRO"). Before the Commission considers this proposal Qwest should be required to specifically state what its batch hot cut cost structure will be and provide the cost studies it conducted to support its proposed rates.

With respect to its current loop hot cut non-recurring costs, Qwest congratulates itself on page 15 of its proposal by stating, "As an initial matter, Qwest notes it is starting from a better position than many other incumbent LECs in this regard. The FCC found in the *Triennial Review Order* that currently hot cuts are '*often* priced at rates that prohibit facilities based competition for the mass market,' citing ILEC non-recurring charges exceeding $100 and as high as $185. But Qwest's hot cut charges across its region are not nearly this high. In virtually every state Qwest's current non-recurring charges for a basic hot cut range between $29.10 and $65.00." Footnotes omitted. What Qwest has failed to point out is that its coordinated installation with Cooperative Testing loop

installation option is as high as $171.87 per loop for the first installation. That rate would place Qwest at the upper end of the range discussed by the FCC. Even assuming a Qwest hot cut rate of $60[2] there remains much room for improvement to remedy the economic impairment experienced by the CLECs when trying to serve the mass market with unbundled loops. In contrast to the much less than $1.00 non-recurring charge the CLECs pay Qwest to migrate a customer to UNE-P, Qwest needs to make significant reductions in its hot cut non-recurring rates to make UNE-L a viable alternative for serving the mass market from a non-recurring charge perspective.[3]

B. Quality of Service

Using the current hot cut process, which requires a physical disconnection of the customer's line from its existing local service provider's switch and reconnecting it to the new service provider's switch, a service outage is unavoidable. When each of the steps of the process is done correctly this service outage can be measured in seconds. However, because of the manual nature of the process and all of the human touch points involved, there is a tremendous opportunity for human error and a resulting service outage. When performing an individual hot cut from retail to UNE-L these outages are a concern for the CLEC because it is the customer's first experience with the CLEC and the CLEC does not want it to be a negative experience. However, when this does happen, at least the CLEC can explain to its new customer that something went awry during the migration process. On UNE-P (or resale) to UNE-L conversions, where the

[2] The approved rate for a coordinated installation without cooperative testing is $59.81 in ten of the Qwest states.

[3] Of course there are other economic impairment issues that the CLECs will face when trying to serve the mass market with UNE-L such as the collocation and backhaul costs. These comments are only related to the economic impairment issues associated with the hot cut non-recurring charges.

batch hot cut process will most likely be used 100% of the time (see functionality section below), these service outages become even more of a concern for the CLEC. In these cases the customer already has his/her service with the CLEC and may have been doing business with that CLEC for an extended period of time. When a hot cut is performed on these customer's lines and an outage occurs, the customer can only think that the CLEC has a maintenance issue. Because the customer impacted by the outage did not request to have his/her service modified, any outage is viewed as poor performance on the part of the CLEC, even though it most likely would have been caused by Qwest. As far as this customer is concerned Qwest is not even in the picture. Therefore, it is of critical importance that hot cut migrations of existing CLEC UNE-P customers be as seamless and go as flawlessly as possible. It should also be noted that Qwest is not above taking advantage of quality problems experienced by CLEC customers that it may have created. Qwest has recently been running radio and television advertisements where it describes how a competitor "dropped the ball" with a customer and how Qwest saved the day.

Qwest's current batch hot cut proposal leaves much to be desired in the area of service assurance and quality. Fundamentally, Qwest's proposal sacrifices service assurance and quality for a reduction of a few process steps. There are many pitfalls Qwest's proposed process that put the CLEC's customers in jeopardy of an extended service outage. Some of the service quality concerns that AT&T has with Qwest's proposal include the following:

1. Batch Hot Cuts Limited to Basic Installation Only

One of the requirements of Qwest's proposed batch hot cut process is "basic installation only on batch conversions."[4] Qwest further underscores the unavailability of coordinated conversions when it states, "Coordinated and/or basic installation is still offered for business as usual activities – for example – requests not identified as part of the conversion or a part of a project managed hot cut."[5] Qwest's proposal to limit batch hot cuts to basic installation only significantly and negatively impacts the CLEC customer in two areas. The first area is that performance testing is not done with basic installation for existing customers. Qwest's SGAT states:

> 9.2.2.9.1.1 For an existing End User, the Basic Installation option is a "lift and lay" procedure. The Central Office Technician (COT) "lifts" the Loop from its current termination and "lays" it on a new termination connecting to CLEC. *There is no associated circuit testing performed*.[6]

Qwest identified the following testing activities as part of performance testing:

> 2-Wire and 4-Wire Analog Loops
>
> - No Opens, Grounds, Shorts, or Foreign Volts
> - Insertion Loss = 0 to -8.5 dB at 1004 Hz
> - Automatic Number Identification (ANI) when dial-tone is present[7]

While Qwest does propose to check for dial tone and ANI, its proposal does not include the other types of performance testing. Qwest's proposal of only basic installation for batch hot cuts is nothing more than reducing the amount and level of testing that it typically does for hot cuts. Qwest's proposal to reduce testing will potentially result in negative impacts on CLEC customers.

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[4] Qwest BHCP – Exhibit 7, p. 1.
[5] *Id*.
[6] Colorado SGAT, March 4, 2003 (emphasis added).
[7] Colorado SGAT, March 4, 2003, § 9.2.2.9.6.

The second major problem with the basic installation only option is that it extends the period of time a customer cannot receive incoming calls. With a coordinated installation option, Qwest contacts the CLEC after the "lift and lay" procedure is completed. Once the CLEC is notified, the CLEC can complete the number portability activities. In contrast, with Qwest's new proposal, the CLEC will be notified only when every line in the batch has been completed.

Page 12 of Qwest's proposal states; "Upon completion of the orders identified on the batch spreadsheet, Qwest will notify the CLEC via email that it has completed the conversion. It remains the responsibility of the CLEC to ensure that each line is triggered for number porting upon completion of the order." This is totally unacceptable from a quality of customer service standpoint. From the moment that Qwest migrates the customer's line on the MDF to the time that the CLEC issues the trigger to port the customer's number, the customer cannot receive phone calls. Considering that Qwest has indicated that a batch project can be as many as 100 lines and Qwest has its technicians performing all of the work (e.g. pre-wiring, dial tone checks, telephone number verifications, and actual "lift and lay" cutover) to migrate these lines on the day of the cut it could literally take hours between the time the first lines are cut over to the CLEC and the CLEC is informed via email of the completion of the cutover. Leaving a customer without the ability to receive calls for this length of time is totally unacceptable. Qwest must revisit its position regarding the timing of the CLEC notification to make this proposal acceptable in this area.

Qwest's proposal of basic installation only clearly sacrifices the CLEC's customer's experience for some yet unquantified benefit.

2. Pre-wiring of the circuit

For individual hot cut orders, Qwest currently performs the Main Distribution frame ("MDF") pre-wiring of the CLEC's Connecting Facility Assignment ("CFA") to the loop two days prior to the cutover. This lead time gives the Qwest frame technician ample time to ensure all of the wiring work has been performed correctly, and is connected to the proper CFA assignment for CLEC's collocated equipment and to the proper cable and pair assignment for the customer's line. However, when this pre-wiring is performed on the day of the cutover, as proposed by Qwest's batch process, there is no margin for error on the part of the Qwest or the CLEC. Considering Qwest's frame technicians work on activities other than batch hot cuts, including individual hot cut orders, new line installs for both retail and wholesale customers, disconnect orders and trouble shooting of maintenance and repair trouble tickets, many times these technicians may be stressed to the limit to complete all of their work for that day. This is especially true in cases where the batch job approaches the Qwest proposed 100 line limit. AT&T feels that to help ensure continuity of customer service, this pre-wiring function must continue to have at least a one day lead time from the batch project due date. Qwest's proposal to eliminate the pre-wiring step sacrifices service quality and the customer's experience solely for Qwest's own efficiency.

3. Qwest's proposed spreadsheet

Qwest is short on details regarding how this spreadsheet is to be prepared and how it is going to be used. AT&T supports the use of an electronically prepared spreadsheet developed by Qwest's OSS's based on the information supplied on the

batch project LSRs. However, if it is Qwest's intention to develop these spreadsheets manually, this adds yet another human touch point to a process that is already very manual. Human errors on this spreadsheet will create confusion and possibly delay the project. They can also result in hot cuts being missed or service outages. Qwest must be required to provide additional details on how this spreadsheet is to be created, how it will be distributed to the stakeholders, what each stakeholder will use the spreadsheet for, how the spreadsheet will be synchronized with the CLEC's LSRs and Qwest's service orders and how errors found on the spreadsheet will be corrected. In addition, creation of a spreadsheet appears on Qwest's proposed process as a new step. It is likely that the spreadsheet creation step is going to put upward pressure on Qwest's already uneconomic hot cut costs.

4. Dial tone checks

Qwest's current hot cut process requires the central office frame technician to check for dial tone and verify the line for the proper telephone number two days prior to the scheduled cutover date. Whereas, Qwest's batch hot cut proposal has its technicians performing these verifications on the day of the cutover just prior to performing the conversion. If a problem is discovered with the CLEC dial tone, Qwest's proposal gives the CLEC one hour to remedy the problem. If the problem cannot be resolved, the affected line is removed from the project.

As was the case for the pre-wiring (item #2 above), AT&T is concerned that performing this quality check on the day of the cut leaves no margin for error for either Qwest or the CLEC. In cases where the no dial tone problem must be resolved by the CLEC, often times one hour is not going to be sufficient, especially in

instances where the CLEC must dispatch a technician to its collocated equipment. When the CLEC cannot quickly resolve these problems, the customer's line must be removed from the batch project. When this happens for multi-line customers, the CLEC must be assured that all lines for that customer are also removed from the project to insure continuity of features such as hunting arrangements. Considering the Qwest frame technicians will be working from either the individual internal service orders that are created for each line that is included in the project or from the proposed spreadsheet, it is not clear how the frame technician will be able to relate the orders to make the determination that the line with no dial tone is associated with a multi-line customer. It is also unclear how the technician will be able to determine the other lines that need to be removed from the project even though they are not experiencing the same no dial tone issues. Additionally, Qwest's proposal is silent on what occurs if the technician discovers a no dial tone condition or an incorrect telephone number on the customer's cable and pair on the line side of the frame.[8] This would be a problem that Qwest would need to correct. AT&T can only assume that these lines will also be removed from the project. If so, the same issue involving multi-line customers is of a concern. AT&T believes that without further details on how the dial tone checks will be performed and how the CLECs can be assured that the right lines are being removed from the project the proposal as written is too risky.

In addition, a Qwest decision to remove one or more lines from the project must be accompanied by a step to assure that Qwest does not disconnect the customer's service under the assumption that the cut would have been completed. In very short

[8] These problems can occur as a result of inaccurate cable and pair inventory records.

order, Qwest technicians must be able to communicate to Qwest's back office systems that an order has been removed from a project and to ensure that no associated disconnect orders are inadvertently completed.

5. CLEC notification

In addition to the previously mentioned problems with the timeliness of the notification, AT&T has a concern with regard to the quality of Qwest's notification process. Qwest's statement indicates that this notification will be based "upon completion of the orders identified on the batch spreadsheet" yet; as discussed in item 4 above, some line may have to be removed from the project even in cases where they did not have a no dial tone problem. Qwest has not indicated how the CLEC will know exactly which of the orders identified on the spreadsheet were cut over and which were not. Unless the CLEC has absolutely accurate information regarding the exact identification of the lines that were cut, the CLEC may port numbers that it should not be porting, thereby adversely impacting customer service.

C. Scalability

As an initial matter, Qwest claims that it provisions "1,000 hot cuts per day on average."[9] The most recent results that Qwest published for the OP-7 Coordinated "hot cut" interval – Unbundled loops – Analog measurement belie that claim. In September of 2003, Qwest completed 9,488 hot cuts in the entire 14-state region. Assuming a twenty day work month, Qwest averaged about 475 hot cuts a day in September of 2003 – nearly half of Qwest's claimed rate. Over the last year, Qwest's OP-7 results show that Qwest averaged about 400 analog loop hot cuts a day in its entire 14-state region. This

[9] Qwest Proposal, p. 7.

represents an average of 28 per workday per state. Qwest's current average daily volume of hot cuts in a state would barely make what Qwest identifies as a minimum batch for its proposed batch hot cut process. Either Qwest's claim of 1,000 hot cuts per day is erroneous, or Qwest is excluding significant volumes of hot cuts from the OP-7 results. Qwest needs to explain the incongruity between its claim of 1,000 hot cuts per day and its OP-7 results for analog loops.

The only specifics that can be found in Qwest's proposal regarding the scalability of the process is that an individual CLEC must have at least 25 and no more than 100 lines in a given CO to qualify for a batch project.[10] Qwest also, on page 14 of its proposal, makes the premature assumption of a finding of non-impairment and therefore lays out the timetable with vague and inaccurate formulas for determining how many hot cuts will be required to convert the embedded base of UNE-P customers. AT&T believes that the Commission should not take Qwest's assumption of a non-impairment finding seriously. Notwithstanding Qwest indulging itself with a little wishful thinking, Qwest needs to provide specific information in the following areas with respect to its ability to handle significantly larger numbers of hot cuts.

1. Limitations imposed on the process

Other than the stated limit of one project consisting of no more than 100 lines per day per CLEC, what other limits does Qwest impose on its process? Some examples of questions that Qwest needs to address are:

- Will Qwest work with multiple CLECs in the same central office on the same day if the sum of the CLECs' batch projects does not exceed 100 lines (e.g. four different CLECs where each CLEC had a bulk project of 25 lines)?

[10] One can assume that CLEC's who have more than 100 lines may break them up into individual batches of less than 100, however, that is not specified in the Qwest proposal.

- Does Qwest impose any limits on the number of CLECs that can migrate 100 lines in a central office in a day?
- Will Qwest allow a CLEC that had two different collocation arrangements in the same CO to include facilities in each of the arrangements on the same project?[11]
- Are there any limitations on the number of simultaneous batch projects Qwest is capable of working within a given geographic area?
- Are these projects limited to central offices that Qwest has staffed on a full time basis or can a project be performed in any central office?

2. Potential Hot Cut Volumes

Qwest's formulas for estimating the potential hot cut volumes it will be faced with in a mass market environment do not provide any specifics with respect to the number of actual hot cuts Qwest estimates it will have to perform during the 27 month transition period. Instead Qwest states, "To calculate the expected monthly volumes in each state, the state commissions should apply the following formulas based on the volumes of UNE-P lines and UNE-L lines in each individual state." Rather than ask the state commissions to estimate the hot cut volumes based on a formula that is neither clear nor accurate (e.g., the formula does not account for the significant hot cut activity that will be required by customer churn and Qwest win-backs), Qwest should come forward on a state by state basis with its estimate of how many hot cuts will be required each month. Qwest must also provide the details on how it came up with this estimate.

3. Additional Qwest Personnel

Assuming that Qwest's work centers, field technicians and central office frame technicians are currently working at optimal capacity, Qwest needs to disclose how many additional people it will need to add to its staff to meet the hot cut demand

[11] CLECs will sometimes have multiple collocation arrangements in the same central office as a result of an acquisition of another CLEC.

estimated in item #2 above. Qwest also needs to specify how it arrived at this estimate and how it plans on recruiting, hiring and training these people to ensure that they are qualified to perform the work that will be required of them without impacting customer service. Additionally, Qwest needs to reveal how the hiring of these additional people will impact the CLEC's hot cut costs.

D. Functionality of the proposed process

The Qwest proposal is extremely short on many of the details needed to determine whether its proposed batch hot cut process will be functional. Additionally, in other areas where Qwest did provide specific information it is clear that there is much room for improvement to make the process of value. Following are some of the specific areas of concern for AT&T with respect to the functionality of the process.

1. Project Intervals

Qwest must clearly state what its interval is between the time the CLEC initiates a request for a batch hot cut project and the due date for the project. In a robust market with many CLECs requesting batch projects these intervals cannot be individually negotiated on a project-by-project basis. Qwest must publish its standard interval for these jobs and be measured on its performance in meeting these intervals. This is particularly critical if a CLEC wants to use this process for a migration from Qwest retail to UNE-L, a migration that Qwest states is supported by its bulk process. Unless the CLEC can give its prospective customer a date certain of when the migration will occur this process can never be used for the migration of retail customers to a CLEC.[12]

[12] It is critical to note that even with standard intervals, unless the interval is reasonable (e.g. 6 business days or less), this process will be virtually useless for migrating retail customers to UNE-L.

Additionally, the introduction of a standard interval for requesting a batch hot cut project will eliminate the time/resource consuming step of conducting the initial batch hot cut project coordination meeting required by the Qwest proposal. With a standard interval a CLEC can initiate a project via a simplified email notification to Qwest of its intent to engage in a batch project. This email would supply Qwest with the details it will need, such as the central office location, the desired project date and time and the number of customer accounts and lines involved with the project. Qwest can respond to this email with the project code and a confirmation of the date which would trigger the CLEC to issue its LSRs. While Qwest's proposal is not entirely clear, it appears that unique Qwest-supplied project codes would be required on the individual LSRs that a CLEC submits as part of the batch. Qwest needs to clarify whether unique project codes are required on an LSR; and, if so, how those project codes are obtained.

2. The process must be voluntary

Qwest's proposal indicates on page 11 that at the initiation of a project request "a CLEC will perform pre-order functions including an initial batch coordination meeting with Qwest." The initiation of a batch project must be at the option of the CLEC and cannot be dictated by Qwest. There are many factors that would prevent a CLEC from wanting to perform a batch hot cut job in a specific central office, even in cases where the CLEC may have the requisite quantity of lines to qualify for a batch project. These factors include, but are not limited to, not having a collocation arrangement in the central office, not having sufficient spare capacity on the collocated equipment that the CLEC has in the central office and a temporary

congestion problem that the CLEC may be experiencing on its network. There should be no mistake that the batch hot cut process that the parties will be creating is voluntary on the part of the CLEC. A CLEC may conclude that Qwest has not reduced the economic or operational impairments of hot cuts sufficiently to justify converting a UNE-P customer to UNE-L. The true measure of the worth of Qwest's batch hot cut process will be seen when CLECs voluntarily choose to exercise that process.

3. Limits on loop types

Qwest's proposal limits the loop types that qualify for a batch project to analog POTS loops and further underscores the operational impairment involved with hot cuts. On page 9 of its proposal Qwest states, "A batch conversion process is possible for these analog DS0 loops, which constitute the vast majority of Qwest's outside plant. But it is not feasible to gain these efficiencies when the underlying facility uses integrated digital loop carrier systems ('IDLC')." AT&T agrees that when the Qwest network is viewed as a whole, the analog DS0 loops do constitute the majority of the loops. However, the batch job is not performed on a network-wide basis; it is performed at a central office level.

When viewed at a central office level, the IDLC restriction becomes a bit more problematic. Qwest has many large central offices with over 30,000 lines that have 30% or more IDLC lines. This is particularly true in states such as Arizona, Washington and Colorado that have experienced a high degree of growth over the past 10 years. In these states, as well as in some of the other states, there are many central offices that would have a large proportion of the loops that terminate in the

office precluded from the batch hot cut process under the current Qwest proposal. In fact there are a number of offices that have more than 50% of their lines on IDLC facilities.[13]

To make this process functional in a mass market environment, Qwest needs to revisit its removal of IDLC lines from the process. In addition, Qwest needs to disclose to the commission and the CLECs what its capacity is for migrating these lines in the high density offices to non-IDLC facilities as required for a hot cut. In wire centers with a high number of hot cuts, Qwest may be limited in the amount of spare copper/UDLC facilities it can use to overcome the IDLC problem. Qwest needs to explain how it will ensure the necessary inventory of spare non-IDLC facilities.

In addition to the restriction of IDLC loops, Qwest's proposal restricts the migration of line splitting loops. Qwest's rational for this is two-fold. First, Qwest states, "The FCC expressly defined its batch-cut requirements in terms of developing a process to migrate loops "from one carrier's local circuit switch to another carrier's *local circuit switch*." The FCC's definition of a 'batch cut process' thus does not include conversions including loop-splitting arrangements that also connect an unbundled loop to a third carrier's *packet* switch." Footnote omitted; emphasis added. Qwest goes on to state, "conversions from UNE-P directly to loop-splitting arrangements cannot be consolidated into a batch because each loop must be individually checked to ensure it is capable of carrying DSL signals and, if not,

[13] Per Qwest's ICONN database. See www.qwest.com/iconn.

conditioned."[14] It seems that on both of these points Qwest seems to have misstated the facts.

To the first point, when cutting over a loop to a CLEC using a line splitting arrangement, the voice frequency portion of the loop does not go to the CLEC's packet switch. After the loop is connected to the CLEC's splitter, the voice frequency is connected to the CLEC's circuit switch. Therefore, the line is being connected "from one carrier's local circuit switch to another carrier's local circuit switch" just as the FCC had envisioned. Secondly, it is highly unlikely that a customer who is receiving standalone POTS service via UNE-P is going to need to be migrated to a DSL capable loop as described by Qwest. However, it is very likely that a customer who is currently on a line splitting arrangement today where the voice service is provided via UNE-P will need to be converted to line splitting when the CLEC is using Qwest's loop and connecting the voice frequency to a CLEC's switch. In these cases there is no need to determine whether the loop requires conditioning for the DSL service because the customer is already receiving DSL service on a loop that is already meeting the requirements for a DSL service. Qwest's rational for restricting line splitting loops from the batch process is without merit. AT&T believes that Qwest should remove this restriction from its proposed process.

4. CLEC-to-CLEC migrations

Qwest's proposal indicates that its batch process will support CLEC-to-CLEC of migrations. However, Qwest is silent on how it plans to include these migrations into the ordering flow for a batch hot cut. Given the current lack of industry procedures

[14] See Qwest's proposal on pages 9 and 10.

on CLEC-to-CLEC migrations, AT&T believes that Qwest needs to provide specific details on how it plans to incorporate these types of migrations into a batch project.

5. Project cutover times

Qwest's proposal on page 13 states; "The CLEC must make resources readily available to clear all loops identified on the batch spreadsheet in a timely manner between the hours of 3:00PM CST and 11:00PM CST." For any of us who have sat around waiting for the telephone installer or repair person who is supposed to show up between the hours of 8 AM and 5 PM, we know how inefficient a use of time this is for the person kept waiting. In addition to providing the CLEC more timely notice on the status of the project as described in the "Quality of Service" section of this document, Qwest needs to be more specific as to what time the project is going to start and what time it anticipates it will end to allow the CLEC to properly plan the workload for its staff members. Additionally, there are going to be times when, because of the nature of the customers being cutover, a CLEC may not wish to have the migrations performed between the hours of 3:00PM and 11:00 PM. In these cases the Batch process should be flexible enough to allow the CLEC to request a batch hot cut project at any time of the day and on any day of the week.

6. Pending orders

The Qwest process has the CLEC issuing LSRs for the lines involved in the project. However, as stated in #1 above, without knowing what the interval is for these LSRs,they may be waiting a considerable amount of time in Qwest's systems as pending orders before the due date of the batch project. Considering that these orders will most likely be exclusively for existing CLEC customers, it is not clear what

happens to that order should the CLEC needs to issue an interim order to make a change on the existing customer's account (e.g. a feature change to a UNE-P customer). Additionally, Qwest needs to clarify what the process is for ensuring that the customer's line does not get migrated as part of the batch process in cases where the customer churned over to another carrier in the time between when the batch order was issued and the due date of the batch project.

7. Service outages

Qwest needs to make clear what the process is for the CLEC to quickly resolve service outages discovered after the CLEC receives the project completion notification. Specifically, will there be a process in place for a "throw-back" of the affected customer's line to its original state to quickly restore the customer's service, or will the CLEC have to go through the normal trouble reporting process? AT&T believes that Qwest needs to have a process in place that will allow Qwest and the CLEC to work cooperatively to restore the customer's service in an expedited time frame.

8. Testing the process

Qwest's proposal is also silent on how it proposes to test its batch hot cut proposal to make sure it is operational. Because the industry has absolutely no experience with operating in a mass market environment using a manual hot cut process, any process being proposed must be thoroughly tested to guarantee its operational readiness. Because of the incentive that Qwest has to make such a test appear that its proposed process is flawless, AT&T believes that this testing should be closely monitored by the Commissions and an independent third-party tester. Additionally, AT&T believes

that this test should not impact any CLEC customer's service and, therefore, should be conducted by having Qwest using its proposed process to migrate a significant number of its own retail customers from a direct connection of the customer's line from the existing Qwest switch over to another Qwest switch connected via collocated equipment located in the original central office. Testing should include independent third-party monitoring of the conversion activities and monthly monitoring of performance results for the converted customers.

III. CONCLUSION

AT&T is encouraged by the fact that Qwest has taken the initial step to propose a batch hot cut process. However, as indicated by these comments, AT&T has many serious concerns about the cost, customer impact, scalability and functionality of the process that was outlined by Qwest in its batch hot cut proposal. Additionally, AT&T is also concerned about the necessary details that were *not* addressed by Qwest.

AT&T looks forward to working collaboratively with Qwest and the other industry participants to work through the Qwest proposal to resolve these initial issues identified by AT&T and issues that are raised by other participants. This collaborative should also determine what other improvements need to be made to improve upon the Qwest proposal and make the batch hot cut process one that is beneficial to Qwest, the CLECs and, most importantly, to the end-user consumer.

RESPECTFULLY SUBMITTED this 18th day of November, 2003.

AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC., AND AT&T LOCAL SERVICES ON BEHALF OF TCG SEATTLE AND TCG OREGON

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