

**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-48

TO THE

SURREBUTTAL TESTIMONY OF BONNIE J. JOHNSON

ON BEHALF OF ESCHELON TELECOM, INC.

APRIL 3, 2007

CLEC Adhoc Meeting
PROS.09.27.06.F.04235.Dispatch_and_MR_Overview
October 10, 2006

Attendees: Bonnie Johnson – Eschelon, Kim Isaacs – Eschelon, Tom Hyde – Cbeyond, Laurie Fredricksen – Integra, Sue Wright – XO Communications, Georganne Weidenbach – Qwest, Cindy Buckmaster – Qwest, Mark Dyson – Qwest, Cathy Garcia – Qwest, Don Tolman – Qwest, Cim Chambers – Qwest, Bud Witte – Qwest, Alan Braegger – Qwest, Mark Coyne – Qwest, Susan Lorence – Qwest, Lynn Stecklein - Qwest

Lynn Stecklein – Qwest stated that the purpose of this meeting is to discuss a level 1 process notice that was distributed on September 27th. The proposed documentation update on this notice was to the Dispatch and the Maintenance and Repair Overview PCATs. Qwest received comments and/or questions from multiple CLECs regarding this notice. Qwest retracted this notice on September 28th in order to work with the CLEC Community to resolve any outstanding issues. This adhoc meeting was scheduled to further clarify that these documentation updates are not a change in Qwest’s process and to answer any questions the CLECs may have.

Lynn Stecklein – Qwest stated that the document in question – Dispatch V4.0 and the Maintenance and Repair Overview V66 can be found on the Product/Process Document Review and Response Archive if anyone wanted to refer to them during this discussion.

Georganne Weidenbach – Qwest stated that Qwest’s intention on this notice was to get the Dispatch PCAT in sync with the Maintenance and Repair PCAT. She said that words were added to provide clarity on tagging and that the existing Qwest process was not changing.

Bonnie Johnson – Eschelon said she thought we were all clear on the tagging process and policy with documentation back to January/February 2004 and asked if Qwest was now saying that is not the policy.

Georganne Weidenbach – Qwest stated that there are many variables associated with this process design, non design, before and after 30 days.

Tom Hyde – Cbeyond said that he agreed that the changes made to the Maintenance and Repair PCAT is not a clarification but a change. He said there was a situation beyond the 30 day timeline and tagging was done at no charge. Tom said that this tells him the practice is inaccurate.

Georganne Weidenbach – Qwest reiterated that there are so many variables and asked if the situation Cbeyond was referring to was a POTS service.

Tom Hyde – Cbeyond said that they only deal in design UBL.

Georganne Weidenbach – Qwest asked Cbeyond if the technician went out to install and did not tag.

Tom Hyde – Cbeyond stated that in the Denver market they never reuse and that there are always new loops and 100% dispatched.

Georganne Weidenbach – Qwest asked if the technician waived the fee on repair.

Cindy Buckmaster – Qwest stated that the current process is that when a technician is dispatched and the tag is not there, they will tag.

Tom Hyde – Cbeyond stated that the PCATs removed references.

Cindy Buckmaster – Qwest stated that the distinction on the variables was there and we are now reinforcing it in the PCAT.

Tom Hyde – Cbeyond stated that it is not clear.

Alan Braegger – Qwest asked if the repair was an out of service scenario.

Tom Hyde – Cbeyond stated that they never request a dispatch for tagging only.

Alan Braegger – Qwest said that tagging was done incidentally to repair and not billed because there was already a dispatch.

Tom Hyde – Cbeyond stated that this is not clear in the PCAT.

Bonnie Johnson – Eschelon stated that there has been a lot of discussion about tagging. She said that Qwest has never said in the PCAT that they will tag at the time of repair or installation in the PCAT, passed 30 days, within 30 days; on some products and that charges apply to some products.

Cindy Buckmaster – Qwest suggested that we read through the language and see if we could clarify.

Bonnie Johnson – Eschelon asked if anyone could tell her if Qwest tags when dispatching on installation.

Georganne Weidenbach – Qwest stated that we will tag on design with provisioning and on POTS and will tag if asked for free if it is within 30 days.

Cindy Buckmaster – Qwest asked how we could make this clear.

Bonnie Johnson – Eschelon said that this practice is very different from what Qwest has told them.

Cindy Buckmaster – Qwest said that if it is clear they would not have had to ask. She said that if it is not clear then we need to clarify and sync up the language. She said that it should not be in 2 places because it causes confusion and that is why we want to keep the documents in sync and follow the existing process.

Susan Lorence – Qwest asked if we should look at the dispatch PCAT, remove the language and point to the Maintenance and Repair language to determine what needs to be clarified.

Bonnie Johnson – Eschelon said that we should go back the way it was documented 2 to 3 years ago. She said that the intent in the M & R PCAT was to say that you don't tag on POTS orders.

Georganne Weidenbach – Qwest asked if Eschelon meant on provisioning.

Bonnie Johnson – Eschelon said yes.

Susan Lorence – Qwest asked everyone to go to the September Document Review site to look at the language.

Georganne Weidenbach – Qwest reviewed the language in the M&R PCAT.

Tom Hyde – Cbeyond stated that this is a significant change in the M & R PCAT.

Georganne Weidenbach – Qwest said that the Dispatch PCAT did not get to the nitty gritty.

Bonnie Johnson – Eschelon said that in 1st paragraph in the M&R PCAT it says that if no dispatch is required on new service, you don't tag. She said it does not say anything for POTS.

Cindy Buckmaster – Qwest stated that is why we need to make the language clearer as there is additional information and detail later in this paragraph.

Tom Hyde – Cbeyond said that POTS have never been tagged. He said this was a SR out of AT&T.

Cindy Buckmaster – Qwest said that was 20 years ago and we need to look at it now.

Bonnie Johnson – Qwest said that with a dispatch, the technician was responsible for tagging.

Cindy Buckmaster – Qwest said that we need to fix that and say that the technician may be responsible for tagging.

Georganne Weidenbach – Qwest said that we will be happy to tag if asked to on POTS.

Bonnie Johnson – Eschelon asked if they would be required to drop their orders to manual handling.

Georganne Weidenbach – Qwest stated that we would need to look at the process beyond 30 days.

Bonnie Johnson – Eschelon stated that she was talking on installation and not beyond 30 days.

Cindy Buckmaster – Qwest said that Eschelon is reading this literally in the 1st sentence but that they have to read further into the document.

Bonnie Johnson – Eschelon said she wants clarification on design and non design.

Cindy Buckmaster – Qwest said that we are looking at maintenance and repair and not installation. She said that we are trying to communicate what the current process is. She asked that we be given the opportunity to capture and clarify the thought.

Bonnie Johnson – Eschelon said that after all the conversations with Qwest she is surprised Qwest first said that they tagged on dispatch but now they are saying that they don't.

Georganne Weidenbach – Qwest said that Eschelon does not have very many POTS and asked if we were delving into an area we don't need to worry about.

Bonnie Johnson – Eschelon said that this is something we need to pay attention to.

Cindy Buckmaster – Qwest said that we are also flabbergasted and struggle when we hear that Qwest does this inequitably.

Bonnie Johnson – Eschelon said that if you look at the documentation in the dispatch PCAT it says you tag.

Cindy Buckmaster – Qwest stated that sentence really belongs in the provisioning PCAT.

Georganne Weidenbach – Qwest stated that we want to make the process clear.

Bonnie Johnson – Eschelon said that it is pretty clear and that you can't interpret.

Cindy Buckmaster – Qwest said that you have to read the paragraph in the PCAT in conjunction with the entire document and that you can't read just that 1 sentence.

Susan Lorence – Qwest stated that where it says 'was responsible' in that paragraph is contingent with what is in design and POTS. She said that you have to read the details under design and POTS. She said that you can't take that sentence by itself. Susan said that the 1st sentence should be "may be responsible..." and "see below for further details".

Georganne Weidenbach – Qwest stated that we are missing finite details and continuity and that customers need those details to understand going forward.

Susan Lorence – Qwest stated that when you have these things in multiple places you tend to have piece parts and that is not enough. Susan asked if we could start with saying details are provided below.

Bonnie Johnson – Eschelon stated that you need to do what you think is appropriate. She said that the way it is worded in the PCAT is clear and supported by years of the process. She said that Qwest said if they dispatched they would tag and now we are being told that we can't take what you say at face value.

Cindy Buckmaster – Qwest stated that when we say "may dispatch and tag" is under question. She said that a lot of good issues are being raised and we want to address and fix those issues.

Tom Hyde – Cbeyond said that he would like clarity on what the conditions are and what Qwest will and won't do.

Cindy Buckmaster – Qwest agreed that we are trying to provide clarity on this issue.

Laurie Fredricksen – Integra stated that in looking at the Provisioning PCAT there is a sentence regarding premise visits.

Cindy Buckmaster – Qwest stated it is further defined later in the document and that we need to make it more clear.

Bonnie Johnson – Eschelon said that it is defined differently for design vs. non-designed products.

Georganne Weidenbach – Qwest stated that it is the same issue with broad statements and that we need to bring it all in sync.

Cindy Buckmaster – Qwest said that we need to make sure everything is all aligned and that we do not intend to change or defraud – we just want to clarify.

Georganne Weidenbach – Qwest said that reviewing the language is a team effort and we need to make it clearer.

Lynn Stecklein – Qwest asked if we are agreeing to take an action item to make the language more clear in the M&R PCAT.

Vicki Dryden – Qwest said that we need to look at not only the M&R PCAT but the Dispatch PCAT as well as the Provisioning and Installation language.

Georganne Weidenbach – Qwest said that we want to make the language match across the PCATs.

Bonnie Johnson – Eschelon said that it does match.

Georganne Weidenbach – Qwest said that it needs more detail.

Bonnie Johnson – Eschelon said that they need to understand the differences for installation and after installation.

Susan Lorence – Qwest asked if it was appropriate to get a tentative agreement that the installation PCAT will have detail and the M&R PCAT will point to the installation PCAT for details.

Bonnie Johnson – Eschelon said that you have to say when you tag for non-designed or how do we find out.

Cindy Buckmaster – Qwest said that the decision was based on the premise that residential units were single family dwellings and not POTS. She said that we are now into large structures with retail users and POTS type services.

Georganne Weidenbach – Qwest said that you can still ask for tagging to be done.

Bonnie Johnson – Eschelon stated that she was in disbelief after fighting for so many years to hear that Qwest never tags POTS services. She said if you need to make a distinction then do so.

Georganne Weidenbach – Qwest asked if the examples Eschelon was referring to were UBL or resale.

Bonnie Johnson – Eschelon said that they were POTS.

Georganne Weidenbach – Qwest asked if they were POTS UNE-P or QPP and said we need to clarify the process for all services. She said that it has never been the process to tag on POTS provisioning but that you could always request it. She said that it is protocol on design. Georganne said that we need to regroup internally to get the documentation to match and send it

out for review. She said that if we make a change to the process we will follow the appropriate process for that change. Georganne asked if everyone was ok with this 2 step approach.

Tom Hyde – Cbeyond said that he was ok with the 2 step approach but was not sure if we could reach agreement. He said that a great deal of work is needed on the PCATs. He also stated that he will advise his Company to dispute the billing on loop until the circuit is tagged because tagging is required on design services. He said that if the tag blows off, the technician did not install it correctly and that tags don't blow off.

Georganne Weidenbach – Qwest said that was just an example and that tags can be torn off.

Tom Hyde – Qwest stated that it would be the ILEC technician tearing it off.

Georganne Weidenbach – Qwest said that there are a lot of variables. She said that there is a process in place to contact Qwest if you want a circuit tagged. She asked again if everyone was ok with moving forward with clarifying the language.

Tom Hyde – Cbeyond said he was ok with moving forward.

Susan Lorence – Qwest stated that Qwest would review the documents to add clarification and would re-issue this notice as a Level 2 to document the existing process. She said that if changes are needed we can use other means to change the process.

Cindy Buckmaster – Qwest asked if we could have discussions prior to updating the documentation.

Susan Lorence – Qwest said that we could follow up with another adhoc meeting and can all work together to get the language where it needs to be.

Bonnie Johnson – Eschelon asked what she was supposed to tell their people and customers. She said that Qwest doesn't tag and that they need to ask for it and the customer get it 5 days later.

Georganne Weidenbach – Qwest said that you can always ask for tagging upfront.

Bonnie Johnson – Eschelon said that we should meet again to review the revised language.

Susan Lorence – Qwest asked if there was anything we could change immediately in the language.

Cindy Buckmaster – Qwest said that would not solve anything because we should be reading more than 1 sentence.

Georganne Weidenbach – Qwest said that we will attempt to revise the redline documents and review as a team with the CLECs.

Tom Hyde – Cbeyond said that the billing issues may need to be addressed as well. He said that the billing should not start until tagged. He said tagging is part of installation.

Georganne Weidenbach – Qwest said that don't always dispatch.

Tom Hyde – Cbeyond stated that dispatch is required on design services and billing should not start until tagging is complete.

Cindy Buckmaster – Qwest said that this would be a process change.

Georganne Weidenbach – Qwest said that if the circuit is accepted and working, billing should start.

Lynn Stecklein – Qwest asked if there any other questions or comments. There were none.

The meeting was adjourned at 4:00 pm.



Announcement Date: December 01, 2006
Proposed Effective Date: January 15, 2007
Document Number: PROS.12.01.06.F.04363.Tagging_of_Circuits
Notification Category: Process Notification
Target Audience: CLECs, Resellers
Subject: CMP - Multiple PCAT update for Tagging of Circuits
Level of Change: Level 3

Summary of Change:

On December 1, 2006, Qwest will post planned updates to its Wholesale Product Catalog that include new/revised documentation for Dispatch V5.0, Maintenance and Repair V68.0 and Provisioning and Installation Overview - V99.0. These will be posted to the Qwest Wholesale Document Review Site located at <http://www.qwest.com/wholesale/cmp/review.html>

On September 27, 2006, Qwest sent a Level 1 PROS.09.27.06.F.04212.Dispatch_and_MR_Overview notice to synch up language in the Dispatch and the Maintenance and Repair PCATs. As a result of questions and comments from multiple CLECs regarding this update, Qwest retracted this via PROS.09.28.06.F.04222.Dispatch_MR_Retraction. During an adhoc call held on October 10, 2006 Qwest agreed to review the PCATs impacted and agreed to re-issue notice as a Level 2. Since that time, Qwest has determined that a change should be made to the tagging of circuit process and is sending this notice of change as a Level 3.

Updates are associated with a change to the tagging of circuits process. When you report a repair condition and also request tagging on this circuit, and a dispatch to the premises is required, Qwest will perform tagging at no charge to you.

The updates to the Maintenance and Repair Overview will be found in the CLEC Roles and Responsibilities section under Demarcation Points and Tagging of Circuits which describes the change in the tagging of circuits process.

The updates to the Provisioning and Installation Overview will be found in the Additional Miscellaneous Work Activities section under Tagging of Circuits at the Demarc, Qwest will clarify the current process for tagging of circuits.

The updates to the Dispatch PCAT will be found in the Description section. Qwest will update the language by providing links to the Maintenance and Repair Overview and the Provisioning and Installation Overview for dispatch information and the associated charges. In the Pricing section under Rate Structure, Qwest will add language which pertains to a Conversion activity.

Also throughout the PCATs mentioned above additional minor updates will be made.

Current operational documentation for this product or business procedure is found on the Qwest Wholesale Web Site at this URL:

<http://www.qwest.com/wholesale/clecs/dispatch.html>
<http://www.qwest.com/wholesale/clecs/maintenance.html>
<http://www.qwest.com/wholesale/clecs/provisioning.html>

Comment Cycle:

CLEC customers are encouraged to review these proposed changes and provide comment at any time during the 15-day comment review period. Qwest will have up to 15 days following the close of the comment review to respond to any CLEC comments. This response will be included as part of the final notification. Qwest will not implement the change sooner than 15 days following the final notification.

Qwest provides an electronic means for CLEC customers to comment on proposed changes. The Document Review Web Site provides a list of all documents that are in the review stage, the process for CLECs to use to comment on documents, the submit comment link, and links to current documentation and past review documents. The Document Review Web Site is found at <http://www.qwest.com/wholesale/cmp/review.html>. Fill in all required fields and be sure to reference the Notification Number listed above.

Timeline:

Planned Updates Posted to Document Review Site	Available December 01, 2006
CLEC Comment Cycle on Documentation Begins	Beginning December 02, 2006
CLEC Comment Cycle Ends	5:00 PM, MT December 16, 2006
Qwest Response to CLEC Comments (if applicable)	Available December 31, 2006 http://www.qwest.com/wholesale/cmp/review_archive.html
Proposed Effective Date	January 15, 2007

If you have any questions on this subject, please submit comments through the following link: <http://www.qwest.com/wholesale/cmp/comment.html>.

Sincerely

Qwest Corporation

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

If you would like to unsubscribe to mailouts please go to the "Subscribe/Unsubscribe" web site and follow

the unsubscribe instructions. The site is located at:

<http://www.qwest.com/wholesale/notices/cnla/maillist.html>

Eschelon's 12/15/06 comments on Qwest's 12/01/06 Level 3 notice

Thank you for submitting your comments through the Qwest CMP Document Review and Comment Process:

The information you entered is listed below.
If you have any questions, please direct them to cmpcomm@qwest.com.

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Notice Number: 1956_CNL3_PROS.12.01.06.F.04363.Tagging_of_Circuits

Document Name:

Document Version Number:

Document History Log Line Number:

Comment:

Eschelon objects to Qwest noticing this as a level three change. Eschelon asks Qwest to withdraw this notice and submit Qwest's proposal as a level four change request (CR) for the reasons provided below. Eschelon also objects to the content of the redlines for numerous reasons, which should be discussed further in the context of a change request.

Qwest's proposed changes (shown in its red lined Dispatch, P&I and M&R PCATs) have a significant change to CLEC operating procedures.

From the redlines of the PCATs, Qwest appears to be attempting to implement new rates through CMP. If Qwest is not attempting to do so, Qwest can explain in the context of discussing a CR and then revise its proposal. A comment period connected with a notice is insufficient to deal with these extensive changes.

Qwest described its current policy/process on the October 10th, 2006 call regarding tagging the demarc. Qwest's proposed changes do not reflect that description (see excerpts from 10/10/2006 ad hoc call below).

On that call, Qwest also said it would draft the language and review with CLEC input (see excerpts from 10/10/2006 ad hoc call below). Qwest has not scheduled the ad hoc call it committed to schedule to discuss the changes.

The multiple proposed PCATs conflict with each other and, in some cases, there are conflicts within a single PCAT.

Examples of comments from the October 10th, 2006, meeting minutes regarding the current process:

“Cindy Buckmaster – Qwest stated that the current process is that when a technician is dispatched and the tag is not there, they will tag.”

“Georganne Weidenbach – Qwest stated that we will tag on design with provisioning and on POTS and will tag if asked for free if it is within 30 days.”

“Georganne Weidenbach – Qwest said that we will be happy to tag if asked to on POTS.”

Examples of comments from the October 10th, 2006, meeting minutes regarding obtaining CLEC input and working as a team:

“Georganne Weidenbach – Qwest said that reviewing the language is a team effort and we need to make it clearer.”

“Cindy Buckmaster – Qwest asked if we could have discussions prior to updating the documentation.”

“Susan Lorence – Qwest said that we could follow up with another adhoc meeting and can all work together to get the language where it needs to be.”

“Georganne Weidenbach – Qwest said that we will attempt to revise the redline documents and review as a team with the CLECs.”

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Name: Kim Isaacs
Title: ILEC Relations Process Specialist
Phone Number: [redacted]
E-mail Address: [redacted]



Announcement Date: December 19, 2006
Effective Date: Immediately
Document Number: PROS.12.19.06.F.04415.QwestDelayedResp-TaggingC
Notification Category: Process Notification
Target Audience: CLECs, Resellers
Subject: CMP - Qwest Delayed Response - Multiple PCAT update for Tagging of Circuits
Level of Change: Level 3

Qwest recently posted proposed updates to Dispatch V5.0, Maintenance and Repair V68.0 and Provisioning and Installation Overview - V99.0. CLECs were invited to provide comments to these proposed changes during a Document Review period from December 02, 2006 through December 16, 2006.

Because of the complexity of CLEC comments, Qwest is unable to meet the required 15-day timeline for comment response. However, Qwest will provide a response to these comments a minimum of 15 days prior to the implementation of the proposed updates. These responses and implementation dates will be provided through a subsequent final notification.

Resources:

Customer Notice Archive <http://www.qwest.com/wholesale/notices/cnla/>
Original Notice Number PROS.12.01.06.F.04363.Tagging_of_Circuits

If you have any questions on this subject, please submit comments through the following link:
<http://www.qwest.com/wholesale/cmp/comment.html>.

Sincerely

Qwest Corporation

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.

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the unsubscribe instructions. The site is located at:

<http://www.qwest.com/wholesale/notices/cnla/maillist.html>

From: Coyne, Mark [email redacted]
Sent: Tuesday, January 09, 2007 1:43 PM
To: Isaacs, Kimberly D.; Isaacs, Kimberly D.
Cc: Johnson, Bonnie J.; Novak, Jean; Linse, Philip; Lorence, Susan; Stecklein, Lynn; Esquibel-Reed, Peggy; Johnson, Bonnie J.; Novak, Jean; Linse, Philip; Lorence, Susan; Stecklein, Lynn; Esquibel-Reed, Peggy
Subject: Tagging of Circuits

Kim,

I'm sending this email to try and help clarify our position and understanding on changes being noticed on PROS.12.01.06.F.04363.Tagging _of_Circuits.

Contrary to Eschelons understanding Qwest does not tag every time they dispatch to the customer premises - this misunderstanding was clarified during the interconnection negotiations. Therefore, it was agreed that CLECs will follow Qwest's normal practice and request tagging to ensure it takes place.

Qwest original intention was to correct the PCATs (Maintenance and Repair, Dispatch, and Provisioning and Installation) to comport with its existing processes.

Qwest scheduled and held its first adhoc call to discuss this and agreed to take CLEC comments into consideration. After the adhoc call, during ICA negotiations with Eschelon, Qwest agreed to tag circuits without charge anytime Qwest is dispatched to an end-users premise and tagging is requested. Because this agreement was reached during negotiations, it is Qwest's intent to make the process change (it is not a rate change) agreement available to the entire CLEC community and submitted the change as a level 3, which differs greatly from the original intention of correcting and clarifying the existing PCAT language.

The previous process would have charged CLECs additionally for tagging designed circuits during repair if requested.

Qwest is following the CMP requirements in Section 5.4.4.1 and will add this item to the agenda for the next CMP meeting. However, Qwest would prefer not issuing a level 4 CR that will delay implementation of this process change that benefits the full CLEC community.

If there are any questions about the specific contract language, contact your Qwest Service Manager or Phil Linse.

Mark Coyne
Qwest Manager/CMP
[contact information redacted]

This communication is the property of Qwest and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

From: Johnson, Bonnie J. [email redacted]
Sent: Tuesday, January 16, 2007 2:49 PM
To: Coyne, Mark; Isaacs, Kimberly D.; Coyne, Mark; Isaacs, Kimberly D.
Cc: Novak, Jean; Linse, Philip; Lorence, Susan; Stecklein, Lynn; Esquibel-Reed, Peggy; Johnson, Bonnie J.; Novak, Jean; Linse, Philip; Lorence, Susan; Stecklein, Lynn; Esquibel-Reed, Peggy; Johnson, Bonnie J.
Subject: RE: Tagging of Circuits

Mark,

Thanks for your response. From your email, it sounds as though Qwest's goal is to have the PCAT reflect the language that will be in the Qwest-Eschelon interconnection agreement. (Let me know if that is incorrect.) After reviewing Qwest's language, we don't believe the language meets that goal. It also has some other problems, such as dealing with an issue that is unrelated to tagging, inconsistency in presentation of information that may lead to confusion, etc. We may discuss these types of things in tomorrow's meeting.

We continue to request a change in status to a Level 4. Qwest's proposal is a significant change from Qwest's existing process as reflected in the PCAT. (We also continue to disagree with your description of "existing processes" and your description of when charges apply under those processes. The existing process is reflected in the long-standing PCAT language that says, for example: "Whenever a Qwest technician is dispatched to a premise, the Qwest demarcation point will be tagged if a tag is not present." [1]). You indicate that you would prefer not issuing a Level 4 CR, but you did not give any reason why it would not be a Level 4 CR. If you have a preference that is different from the actual level of the request, you need to request an exception. You indicate that this change benefits the full CLEC community, but that is for the CLEC community to decide. Eschelon was willing to sacrifice some of the benefits of the current process (such as requesting tagging in some cases when a request is not currently required under the existing process as reflected in Qwest's PCAT) in order to close this issue, other CLECs may make a different choice. You would need to request an exception, etc., to find out.

Thanks and we look forward to discussing this issue tomorrow,

[1] See Qwest's PCAT, *Dispatch – V 3.0* available at <http://www.qwest.com/wholesale/clecs/dispatch.html>.

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



February 21, 2007

Product/Process CMP Team Meeting

Distribution Package

Qwest Wholesale Change Management Process (CMP) Meeting Minutes

Tagging of Circuits

Mark Coyne-Qwest stated that Qwest issued a Level 1 notice in October with the intent to provide consistent documentation in the Provisioning, Installation and M&R PCATs. He said that this notice resulted in some CLEC comments and concerns and that Qwest held an adhoc meeting to discuss. Mark stated that Qwest moved forward with some additional updates on a Level 2 notice. He said that due to decisions made associated with the negotiations going on with Eschelon, Qwest was prompted to issue a Level 3 notice for more PCAT updates and a change in process. Mark said that we did receive comments requesting a change in disposition to a Level 4. He said that Qwest issued a delayed response and that we did receive additional comments from Eschelon. Mark stated that Qwest would like to move forward with a separate adhoc meeting to understand Eschelon's concerns and discuss what was discussed in negotiations. He stated that we would proceed with a Level 3 if we can reach agreement and if we can't reach an agreement, Qwest would open up a Level 4 CR.

Bonnie Johnson-Eschelon stated that at a high level there are inconsistencies in dispatch vs. provisioning and installation. She said that **(Comments to minutes from Eschelon 1/26/07) - the Dispatch PCAT refers you to the M&R PCAT** you refer to dispatch and the same should be done for in the Provisioning and Installation PCATs. Qwest also made a change under Service Wire Rearrangements and that has nothing to do with tagging. She also said that Additional Labor and Additional Labor - other **dispatch** are 2 different charges.

Cindy Buckmaster-Qwest said **(Comments to minutes from Eschelon 1/27/07 - yes she made that change as a clean up when she was going through the PCAT.)** She disagreed because they are the same charges.

Bonnie Johnson-**(Comments to minutes from Eschelon 1/26/07 - Eschelon provided Mark Coyne with a copy of Exhibit A and showed him the two different charges.** She said that some changes were not in the tagging section and some changes were made with no explanation as to why.

Cindy Buckmaster-Qwest said that she just saw what Eschelon was referring to and that maybe we should not have made the changes together.

Bonnie Johnson-Eschelon stated that discussions were held with Georganne Weidenbach (Qwest) and Cindy Buckmaster (Qwest) regarding **(Comments to minutes from Eschelon 1/26/07 - Qwest's changes the PCAT and these updates do not match what they said.** She said that **then they read Mark's e-mail and realized that Qwest was trying to make updates that matched what Eschelon had negotiated for its contract. Bonnie said Eschelon made some concessions and** also discussed their concerns regarding **ICA controls and if other CLECs want to opt in the can but are not required to** and that other CLECs need to provide input.

Cindy Buckmaster-Qwest stated that other CLECs do need to weigh in and that is why we have CMP. She said that we get feedback and decide if we move forward with a change. Cindy said that she and Georganne Weidenbach (Qwest) never said the PCATs were wrong but that the PCATs appeared to be inconsistent. She said that we were trying to clarify and acknowledge that they could be misleading if taken out of context.

Bonnie Johnson-Eschelon stated that Qwest said that the PCAT was wrong and **Qwest** has sworn testimony.

Mark Coyne-Qwest stated that we will schedule an adhoc meeting to address the differences and Qwest will determine if we need a Level 3 or 4.

Bonnie Johnson-Eschelon stated that she was ok with this path but **(Comments to minutes from Eschelon 1/26/07 - Eschelon will continue to ask that this be a level 4 change request.)**

Mark Coyne-Qwest asked why Eschelon is requesting a Level 4.

Bonnie Johnson-Eschelon stated that this looks like a major process change to Eschelon **(Comments to minutes from Eschelon 1/26/07 - and the previous Provisioning and Installation and Repair PCATs state Qwest will tag when they dispatch.**

Cindy Buckmaster-Qwest said **(Comments to minutes received from Eschelon 1/26/07 - UBLs are always tagged and the language Qwest proposed changes are different than the current process.** She said that we tried to address that the dispatch PCAT was written from a UBL perspective and not from a POTS perspective. She said that we found that the documentation needed distinction between POTS and design for tagging.

Mark Coyne-Qwest stated that an adhoc meeting will be scheduled.



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Meeting Title	CMP Ad Hoc Meeting - Tagging
Time	10:00 AM MT
Duration	1 Hour
Location	1-877-570-8688 Passcode 7807739#
Meeting Description	Discuss Provisioning, Installation & M&R PCATs (Tagging)
Documents	There are no additional documents for this event.
Contact Information	Lynn Stecklein

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