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-50

TO THE

SURREBUTTAL TESTIMONY OF BONNIE J. JOHNSON

ON BEHALF OF ESCHELON TELECOM, INC.

APRIL 3, 2007

KEY:
JEOPARDY CLASSIFICATION AND FIRM ORDER CONFIRMATION:
EXAMPLES OF QWEST'S FAILURE TO PROVIDE AN FOC OR A TIMELY FOC

A = QWEST SAYS CLASSIFICATION CORRECT (DESPITE NO FOC AFTER PERTINENT[i] JEOPARDY): Qwest (1) admits that it is supposed to send an FOC after a Qwest facility jeopardy is cleared;[ii] (2) admits in this example that Qwest sent NO FOC; and yet (3) claims in this example that it is ok to attribute fault by assigning a Customer Not Ready (CNR) (i.e. Eschelon-caused) jeopardy.

> Row Numbers: 1, 2, 3, 4, 5, 6, 10, 4,16, 17, 18, 21   (12 total per Qwest)
> [Eschelon agrees Qwest sent no FOC, but disagrees that these should be classified as
> Eschelon-caused (CNR).]

B = QWEST SAYS CLASSIFICATION CORRECT (DESPITE UNTIMELY FOC AFTER PERTINENT JEOPARDY): Qwest (1) does not dispute that, although it sent an FOC, the FOC was not sent at least the day before; and yet (2) claims in this example that it is ok to attribute fault by assigning a Customer Not Ready (CNR) (i.e. Eschelon-caused) jeopardy. Qwest disputes that it agreed in CMP to send an FOC at least the day before.[iii]

> Row Numbers: 7, 8, **9,** 11, **13**, 19, 20, NA   (8 Total per Qwest)
> [Eschelon does not agree that a pertinent FOC was sent for Nos. 9 and 13 (*see* end note i);
> Eschelon disagrees that these should be classified as Eschelon-caused (CNR).]

C = QWEST ADMITS CLASSIFICATION INCORRECT (BUT DUE TO ANOTHER QWEST FACILITY ISSUE): Qwest (1) admits that it is supposed to send an FOC after a Qwest facility jeopardy is cleared; (2) admits in this example that Qwest sent NO FOC; (3) Qwest admits in this example that it was wrong to blame Eschelon by assigning a Customer Not Ready (CNR) jeopardy CNR; *but* (4) Qwest does not attribute the incorrect classification to the failure to send an FOC; rather, Qwest identified another facility issue (after the first one cleared) and should have sent another Qwest (*i.e*., "Qwest-caused) facility jeopardy notice instead of a CNR jeopardy.

> Row Numbers: 12, 15, 22 (3 Total per Qwest)
> [The companies agree that no FOC was sent. Eschelon agrees that the CNR classification was incorrect,
> but unlike Qwest considers the absence of an FOC sufficient reason to not assign CNR.]

"Qwest error"/"Possible Qwest error"[iv]
See next page for end notes

End notes for KEY to Jeopardy Classification and Firm Order Confirmation Exhibit
See next page for start of chart

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[i] Qwest asks the question "FOC Sent after *original* Jeopardy"? (emphasis added). By limiting the question to the "original" jeopardy, Qwest ignores the pertinent jeopardy. In cases with multiple Qwest facility jeopardies, the pertinent question (to determine whether CLEC had advance notice sufficient to prepare for delivery of the circuit), is whether Qwest sent an FOC after the Qwest facility jeopardy that is the ***final one before delivery*** (which is the question answered by Eschelon in Exhibit BJJ-6). For Row Number 9 (PON RA-R6 PON AZ591886T1FAC) and Row Number 13 (PON AZ602905T1FAC) in this exhibit, Qwest represents that it sent an FOC after the *original* jeopardy notice without pointing out that it did not send an FOC after the *pertinent* Qwest facility jeopardy notice. For these two examples, Qwest sent an FOC after the first Qwest facility jeopardy but the order went into a Qwest facility jeopardy a second time, and Qwest *did not send* an FOC after the second Qwest facility jeopardy notice. The most recent information available to Eschelon from the jeopardy/FOC notices, therefore, was that it should not expect delivery, because Qwest had a facility problem to resolve before it could deliver a circuit.

[ii] MN ICA Arbitration Transcript, Vol. I, p. 37, lines 20-23 (Ms. Albersheim): "Q So you agree with me that Qwest's current practice is to provide the CLEC with an FOC after a Qwest facilities jeopardy has been cleared; is that right? A Yes." *See also* ICA Section 9.2.4.4.1 (quoted in note 4).

[iii] MN ICA Arbitration Transcript, Vol. 1, p. 37, lines 16-23 (Ms. Albersheim). Qwest claims that Eschelon's proposed phrase "at least the day before" is not part of Qwest's current process. *See id*. p. 37, lines 11-19. (Other than that phrase, however, Qwest admits that the remainder of Eschelon's proposed language reflects Qwest's current process. *See id*. p. 37, lines 16-23.)

[iv] For Row Numbers 10 and 21 (which are rows 11 and 22 in Qwest Exhibit RA-28RT), Qwest inserts a note "Qwest error" and for Row Number 22 (which is row 23 in Qwest Exhibit RA-28RT), Qwest inserts a note "possible Qwest error." These three examples generally follow the same pattern as the others up through the point of Qwest assigning the Customer Not Ready (CNR) jeopardy. Generally, Eschelon supplements the order. In these three cases, after Eschelon supplemented the order, there was some unusual FOC activity (with Qwest sending FOCs after the completion notice). While it may have been an error for Qwest to send the additional FOC(s) after the completion notice, that type of error is not the issue here. The assignment of the CNR jeopardy when Qwest has either not sent an FOC or a timely FOC (with "timely" referring to "at least the day before") after the pertinent Qwest facility jeopardy. In other words, the damage had already been done (with "damage" referring to a delay in delivery due to failure of Qwest to provide sufficient advance notice of delivery). Note that these three Rows (for which Qwest admits an error or possible error) do not coincide with the three for which Qwest admits its CNR classification was incorrect. Only Row 22 falls into both. For Rows 10 and 21, Qwest identifies an error but says the CNR classification was correct. It is unclear, therefore, why Qwest even raised this point.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
1. 0R462897T1FAC	12971352	Releasing FOC for K 1 jep never sent. Qwest applied invalid CNR jeopardy	OR	N10835043	Although Qwest did not send a FOC prior to the DD of 1/1 1/05: Qwest started working with [ER][3] at Eschelon prior to 5 p.m. End result is that Eschlon was having wiring problems and	No FOC = Invalid CNR[4] In addition, with respect to Qwest's "Review": Qwest states the 1/11/05 is the "due date," but there is no "due date" for this request because Qwest did not send an FOC with the new due date.[5] Qwest	NO	NO	"A" No FOC = Invalid CNR

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[1] **Qwest Inconsistent Times**: Qwest does not record times consistently in its Review. Eschelon has compared the times with its own records and found that Qwest does not use military time consistently, and does not always indicate whether AM or PM, which affects the analysis.

[2] Qwest indicated it relied upon Qwest technical notes. See MN PUC Docket No. P-5340, 421/IC-06-768, Rebuttal Testimony of Renee Albersheim, p. 54, lines 19-24. Those notes may or may not be accurate. For purposes of this Exhibit only, Eschelon has accepted the statements in the notes.

[3] **Redacted**: ER = Eschelon contact name redacted.

[4] **ICA Section 9.2.4.4.1**: ". . . If Qwest must make changes to the commitment date, Qwest will promptly issue a Qwest Jeopardy notification to CLEC that will clearly state the reason for the change in commitment date. Qwest will also *submit a new Firm Order Confirmation* that will clearly identify the new Due Date." (emphasis added). This language appears in the SGAT and Qwest's negotiations template. *See also* the PCAT provisions (cited in footnote 5) for "DD Jeopardies" that indicate Qwest's process is to send an FOC after the facility jeopardy notice if the condition is resolved so that the CLEC should expect delivery.

[5] **DD Jeopardies Mean Expect No Delivery Unless Receive New FOC**: *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process states (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours." In other words, for this type of jeopardy, the CLEC is told to do nothing to prepare unless Qwest sends a notice indicating the condition has been resolved.   To disregard a jeopardy notice means to plan to prepare to accept delivery as though you had not received a notice. If "yes" is in the column, you do not prepare because you are being told that there is no need to do so *unless you receive a new FOC from Qwest*. Qwest's PCAT states at http://www.qwest.com/wholesale/clecs/provisioning.html:

"Qwest differentiates between DD jeopardies and Critical Date jeopardies. DD jeopardies indicate that your due date is in jeopardy; however, Critical Date jeopardies indicate that a critical date prior to the DD is in jeopardy. Critical Date jeopardies can be ignored by you. Critical Date jeopardies are identified in the Jeopardy Data document (see download in the following paragraph) in the column labeled "Is Due Date in Jeopardy?" If the DD is not in jeopardy, this column will contain "No" and you can disregard the jeopardy notice sent for this condition and continue your provisioning process with the scheduled DD. If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, we will advise you of the new DD when the jeopardy condition has been resolved. This is usually within 72 hours."

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
					[ER]at Eschelon indicated that he needed to dispatch a technician to the cage and [ER] said he would supp the order. Qwest subsequently received the supplement as indicated by Eschelon and [ER] at Eschelon accepted the service on 1/12 (Qwest installed the service prior to the supp'd due date of 1/17)	did not notify Eschelon that Qwest had cleared the K17[6] jeopardy condition so Eschelon staff and prepare to accept delivery of the circuit. Had Qwest notified Eschelon that there was a new due date, Eschelon could have dispatched to the cage and completed the required wiring thus resolved the issue before Qwest attempted to deliver the circuit. Qwest's failure to notify deprived Eschelon of this opportunity to prepare.			
2. UT474484T1FAC	13275636	Releasing FOC not sent the day prior to DD Qwest applied an	UT	N13197574	DD 2/9/05 missed due to Qwest reasons and a jeopardy	No FOC Day Prior = Invalid CNR In addition, with	NO	NO	"A" No FOC Day Prior =

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[6] **Jeopardy Codes ("K" jeps)**: Qwest Jeopardy Data Document (http://www.qwest.com/wholesale/downloads/2005/050812/Jeopardy_Data_Provisioning_August2005.doc) lists the jeopardy code (type) in the first column, the party responsible to resolve the problem in the second column, and whether the due date is in jeopardy in the third column. For example, on Page 6 of 10, in the last row, "K17" is column one; Qwest engineering is listed as the responsible party in column two; and "yes" is in column three. The example shows that: 1) The jeopardy is a K17 Qwest facility jeopardy (*i.e.* Qwest-caused); 2) Qwest engineering is the responsible party to resolve the jeopardy; and 3) The due date is null and void and CLEC is to do nothing unless Qwest sends an FOC with a new due date once the jeopardy condition has been resolved. In this Exhibit, the jeopardy code or type is provided in one of the two review columns (Qwest's or Eschelon's) or both. The codes are identified in Qwest Jeopardy Data Document available at http://www.qwest.com/wholesale/downloads/2005/050812/Jeopardy_Data_Provisioning_August2005.doc

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
		invalid CNR jeopardy.			of K45 was shown on the order in Qwest's systems as the original due date miss. Qwest contacted [ER] at Eschelon at 7:36 am on the DD to advise of possible miss. 2/10 at 7:18 called Eschelon and left Voice Mail that Qwest was ready to test and due date rescheduled for today. Eschelon never called back and a second DD jeopardy of C01 was posted against the order. C0l jeopardy notice	respect to Qwest's "Review": ***Qwest missed Eschelon's requested due date*** because of a Qwest facility jeopardy. Because Qwest then classified it as CNR, Qwest's missed due date will not count against its performance in the PIDs. In Qwest's review, Qwest said the time Qwest called Eschelon, on 2/9/05, to advise Eschelon Qwest would miss the due date as 7:36 ***AM***. Qwest said the time Qwest called Eschelon to deliver the circuit on 2/10/05, is 7:18 but does not say whether this was AM or PM.			Invalid CNR

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[7] Eschelon recorded the time directly from IMA while tracking DS1 capable loop jeopardies. Eschelon included the date and time in the spreadsheet it sent to its Service Management team at Qwest. As a rule, if Qwest applied the customer jeopardy to the request before 6 PM Central time on 2/10/05 (local time for this order), Eschelon should have received an automated jeopardy at 19:00 hours on 2/10/05. Eschelon recorded Qwest sending Eschelon the jeopardy at 5:50 AM the next morning. This would suggest that the Qwest may have placed the request in a customer jeopardy status after 6 PM local time on 2/10/05.

[8] **Business Hours**: *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says "Qwest normal business hours are Monday through Friday from 8 AM to 5 PM but may vary based on company policy, union contracts and location."

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	**LSR ID**	**Reason for Invalid Customer Not Ready (CNR) Jeopardy**	**ST**	**Order #**			**CNR Jeopardy in Error?**	**FOC Sent after original Jeopardy?**	*SEE* KEY AT END FOR "A" – "C"
				was sent to CLEC on the 10th. 2/14 supp to chg DD to 2/17; however Qwest still installed on the 14th.		Qwest's review says it sent the CO1 jeopardy on 2/10/05; however, Eschelon records show that Qwest sent Eschelon the C01 jeopardy at 5:50 AM on 2/11/05, the following morning.[7] If Qwest contacted Eschelon at 7:18 *PM*, Qwest's CNR jeopardy was in error. Qwest's hours for loop installation are 8 am to 5 pm local time. [8]			
NA[9]	NA	NA					NO	YES	NA
3. OR477412T1FAC	13349048	Releasing FOC for K I jep never sent. Qwest applied invalid CNR Jeopardy	OR	N14485305	Orig K17 jeop sent 2/22 at 6:02 pm. Jeopardy condition cleared on the DD. Contacted Eschelon to attempt to turn up the circuit. Eschelon indicated they would be avail after 5P Pac,	No FOC = Invalid CNR In addition, with respect to Qwest's "Review": Eschelon requested a due date of 2/23/05 and Qwest sent a Qwest facility jeopardy on 2/22/05 at 6:02 PM. There was no "due date" for this request because Qwest	NO	NO	"A" No FOC = Invalid CNR

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[9] NA = Not Applicable. PON CO477191T1FAC is included in Qwest's Exhibit RA-28RT. Eschelon removed this from the list of examples when it updated Exhibit BJJ-6 with Exhibit BJJ-35.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
					CLEC had equipment problems and C0l jeop posted; 2/24 supp to chg DD to 3/1; Qwest did install and Eschelon accepted on 2/24 instead of waiting until new DD of 3/1.	did not send an FOC with the new due date.[10] Qwest did not notify Eschelon that Qwest had cleared the jeopardy condition so Eschelon staff could prepare to accept delivery of the circuit. Had Qwest notified Eschelon that Qwest had cleared the jeopardy and there was a new due date, Eschelon may have resolved any equipment troubles prior to Qwest delivering the circuit.			
4. AZ485850T1FAC	13789261	Releasing FOC for K 1 jep never sent. Qwest applied invalid CNR jeopardy.	AZ	N17311757	Jeopardy notice was sent 3/16 and later cleared. No FOC resent. Talked to [ER]at Eschelon on the PTD	No FOC = invalid CNR In addition, with respect to Qwest's "Review": Qwest states 3/17/05 is the "due date," but	NO	NO	"A" No FOC = invalid CNR

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[10] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

[11] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
				3/16/05 at 13:5g, he was going to test and call back 3/17 no callback from CLEC. C01 jeop posted. 3/18 supp to chg DD to 3/23; Qwest installed the circuit on 3/18 with the CLEC instead of waiting for new 3/23 date.		there is no "due date" for this request because Qwest did not send an FOC with the new due date.[11] Per Qwest's Review, not only did Qwest not send Eschelon an FOC, but Qwest attempted to deliver the circuit the day *before* Eschelon's requested due date. Qwest inaccurately placed a CNR jeopardy on the request. Qwest should have at least called back on the requested due date to deliver the circuit.			
5. WA494646 T1FAC	14216585	Releasing FOC for K I jep never sent. Qwest applied invalid CNR jeopardy.	WA	N21366533	Kl7 jeop sent 4/1 3 and K43 on DD 4/14/05. Contacted [ER] at Eschelon at 16:58 he said he would test and call back. [ER] called back at 17:23 can't see signal. Problem	No FOC = invalid CNR In addition, with respect to Qwest's "Review": CNR was inappropriate for two reasons. The first is that Qwest did not send Eschelon an FOC and the second is	NO	NO	"A" No FOC = invalid CNR

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
					originally thought to be on CLEC side. 4/15 found trbl to be in Qwest wiring, fixed & CLEC accepted.	because Qwest placed the CNR jeopardy on the circuit before it checked wiring to ensure the trouble was not on the Qwest side. ***Qwest did not deliver a working circuit.*** However, in this example, had the circuit tested good and Qwest was delivering a working circuit, Eschelon would have accepted the circuit in spite of the fact that Qwest did not send Eschelon an FOC with a due date.[12]			
6. AZ510194 T1FAC	14657841	Releasing FOC for K I jep never sent. Owest applied invalid CNR jeopardy.	AZ	N26053835	Sent K17 jeop on 5/31 and a KI 8 on 6/3. DD 6/3/05 missed due to Qwest reasons and coded as such in Qwest internal systems. No FOC sent. 6/6 ref'd to CLEC who will test &	No FOC = invalid CNR In addition, with respect to Qwest's "Review": CNR was inappropriate for two reasons. The first is that Qwest did not send Eschelon an FOC and the second is	NO	NO	"A" No FOC = invalid CNR

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[12] Eschelon ICA Section 12.2.7.2.4.4.1 proposal: "CLEC will nonetheless use its best efforts to accept the service."

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
					call back C01 jeop; CLEC can't loop NIU; Originally problem thought to be on the CLEC side. 6/7 found trbl to be in Qwest wiring, fixed & CLEC accepted.	because Qwest placed the CNR jeopardy on the circuit before it checked wiring to ensure the trouble was not on the Qwest side. *Qwest did not deliver a working circuit.* However, in this example, had the circuit tested good and Qwest was delivering a working circuit, Eschelon would have accepted the circuit in spite of the fact that Qwest did not send Eschelon an FOC with a due date.[13]			
7. CO528230 T1FAC	15276469	Releasing FOC not sent the day prior to DD Qwest applied an invalid CNR jeopardy.	CO	N30873460	Sent KI7 jeoparrdy on 8/1. Sent K18 jeopardy on 8/4. Sent FOG 8/5 at 7:33 DD 8/5/05; 8/5 16:34 ref'd to CLEC; 19:23 no CLEC callback C01 jeop; 8/8 supp to chg DD to 8/1 1	No FOC Day Prior = Invalid CNR	NO	YES	**"B"** No FOC *Day Prior* = Invalid CNR

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[13] Eschelon ICA Section 12.2.7.2.4.4.1 proposal: "CLEC will nonetheless use its best efforts to accept the service."

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
				; 8/8 CLEC called to accept.					
8. WA535799T1FAC	15508546	Releasing FOC not sent the day prior to DD Qwest applied an invalid CNR jeopardy.	WA	N33388590	Initial jeop sent K17 on 8/29. Jeop K08 on 8/31 . 9/2 sent FOG with DD 9/2/05 at 3:05. 9/2 refd to [ER] at Eschelon at 16:13, [ER] advised to C01 jeop.C01 jeop; 9/6 supp to chg DD to 9/9; 9/7 CLEC accepted the circuit	No FOC Day Prior = Invalid CNR In addition, with respect to Qwest's "Review": Qwest first sent Eschelon two Qwest facility jeopardies. On the due date Eschelon's requested (9/2/05), Qwest sent Eschelon an FOC at 3:05 (15:05)[14] with the new due date of that same day (9/2/05). Qwest contacted Eschelon to deliver the circuit at 16:13 (4:13 PM). This allowed Eschelon only a little over an hour to staff and prepare to accept the circuit.	NO	YES	"B" No FOC *Day Prior* = Invalid CNR
9. AZ591886T1FAC	16172421	Releasing FOC for K 1 jep never sent. Qwest applied invalid	AZ	N40299259	Sent KI7 on 11/21. K45jeop sent also on 1 1/2lat 6pm. Sent	NO FOC = invalid CNR In addition, with	NO	YES	"A" NO FOC = invalid

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[14] For this request, Eschelon recorded the time directly from IMA and included this time in the spreadsheet Eschelon sent to Qwest service management. The time Eschelon recorded directly from IMA was military time (15:05) so Eschelon determined the time Qwest describes as 3:05 was 3:05 PM.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
		CNR jeopardy.			FOC 11/21 5:49pm with 1 1/22 DD. 1 1/22 1658 ref'd to CLEC; 1729 no CLEC callback C01 jeop; I 1/29 supp to chg DD to 1212; 11/29 CLEC can't loop NIU will dispatch CLEC tech to cage; 12/2 CLEC accepted	respect to Qwest's "Review": Qwest's Review suggests that Qwest sent a Qwest facility jeopardy, Qwest sent another Qwest facility jeopardy and then Qwest sent Eschelon an FOC. Qwest lists the sequence incorrectly. The times in Qwest's Review show that Qwest sent the second facility jeopardy *after* Qwest sent the FOC. Looking at the sequence in order of time, the last notice Qwest sent Eschelon was a second Qwest facility jeopardy (K45 jeopardy) *after Qwest sent Eschelon the FOC*. The request was in a Qwest facility jeopardy status at the time Qwest called to deliver the circuit at			CNR *See* end note i to KEY above regarding pertinent FOC; although an FOC may have been sent after the original jeopardy, an FOC was not sent after the most recent Qwest facility jeopardy before delivery.

[15] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
						4:58 PM local time -- *two minutes before the close of business*. Qwest did not send an FOC releasing the K45 jeopardy so this request did not have a new due date.[15]			
10. WA609209T1FAC	16594320	Releasing FOC for K1 jep never sent. Qwest applied invalid CNR jeopardy.	WA	N44115166	lnitial jeop 1/11 Kl7jeop. 1/12 Kl7jeop. No FOC. DD 1/13/06; 1/13 referred to CLEC [ER] at Eschelon at 16:49 left message. 17:29 on 1/13 worked with CLEC to try to turn up CKT. CLEC unable to accept. C01 jeop; 1/17 supp to chg DD to 1/20; 1/18 refd to CLEC & CLEC [ER] accepted.	No FOC = Invalid CNR In addition, with respect to Qwest's "Review": Qwest states 1/13/06 is the "due date," but there is no "due date" for this request because Qwest did not send an FOC with the new due date.[16] Qwest's review states "CLEC unable to accept." The Qwest review does not say why Eschelon was unable to accept the circuit. Eschelon may have been able to accept the circuit if	NO	NO Qwest error	"A" No FOC = Invalid CNR See end note iv to KEY above regarding Qwest's note ("Qwest error) in previous column

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[16] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
						Qwest had sent Eschelon an FOC and Eschelon was prepared to accept the circuit.			
11. AZ610571T1FAC	16615282	Releasing FOC not sent the day prior to DD Qwest applied an invalid end user customer no access C02 jeopardy.	AZ	N43700628	Initial jeop K17 on 1/11. Sent FOC 1/16 at 3:42 with 1/16 DO. 1/16 15:51 received call from outside tech, advised NoAccess to prem Called CLEC and advised no access. C02 jeopardy posted. 1/20 supp to chg DD to 1/25, cld CLEC advsd ckt rdy; 1/23 CLEC accepted (prior to 1/25 supped due date)	No FOC Day Prior = Invalid CNR In addition, with respect to Qwest's "Review": Eschelon requested a due date of 1/16/06. Qwest sent Eschelon a Qwest facility jeopardy on 1/11/06. Qwest sent a FOC at 3:42 (15:42)[17] on 1/16/06. Qwest's Review says the Qwest technician called a Qwest internal department at 15:51 (*nine minutes later*) to say the Qwest technician did not have access to the customer premise. *Qwest allowed Eschelon nine minutes to arrange premise access with*	NO	YES	"B" No FOC *Day Prior* = Invalid CNR

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[17] For this request, Eschelon had recorded the time directly from IMA and included this time in the spreadsheet Eschelon sent to Qwest service management. The time Eschelon recorded directly from IMA was military time (15:42) so Eschelon determined the time Qwest describes as 3:42 was 3:42 PM.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
						the customer.			
12. AZ610687T1FAC	16615986	Releasing FOG for K I jep never sent. Qwest applied invalid CNR jeopardy	AZ	N45042996	Kl7jeop 1/13. No FOC. 1/16 C01 jeop posted. 00 1/16/06; 1/16 15:43 advsd [ER] at Eschelon order was released from held. He said would test and call back. 16:39 CLEC cannot loop NIU, still trying to meet DO. CLEC wl stay til 1800, unable to resolve before CLEC left, C01 jeop'd in error (should have been K jeop); 1/18 supp to chg 00 to 1/23; 1/18 CLEC accepted	No FOC = Invalid CNR In addition, with respect to Qwest's "Review": Although Qwest admits CNR was invalid, it gives only one of the reasons why it was invalid. The other is that Qwest sent no FOC after the facility jeopardy. [18] Qwest admits it placed a C01 jeopardy on this request in error because Qwest should have placed a K jeopardy (Qwest facility jeopardy) on the request.	YES	NO	"C" No FOC = Invalid CNR Companies agree "CNR" was in-appropriate
13. AZ602905T1FAC	16798946	Releasing FOC for K 1 jep never sent. Qwest applied invalid	AZ	N46302319	Initial K17 jeop sent on 1/31 . FOC send 2/2	No FOC = Invalid CNR	NO	YES	"A" NO FOC =

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[18] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
		CNR jeopardy			with 00 2/7; 2/6 K18 jeop was issued. No subsequent FOC. 2/7 10:08 referred order to CLEC to test but no CLEC callback (as of 17:34); C01 jeop posted. 2/8 supp to chg DD to 2/13; 2/9 CLEC accepted service and order completed.	In addition, with respect to Qwest's "Review": Eschelon requested a due date of 2/7/06. Qwest did not send Eschelon an FOC releasing the order from the second Qwest facility jeopardy (K18 jeopardy).[19]			invalid CNR *See* end note i to KEY above regarding pertinent FOC; although an FOC may have been sent after the original jeopardy, an FOC was not sent after the most recent Qwest facility jeopardy before delivery.
14. AZ624356T1FAC	16886232	Releasing FOC for K 1 jep never sent. Qwest applied invalid CNR jeopardy	AZ	N47011517	Sent K17 jeops on 2/13. No FOC. Sent K18 jeop at 16:02 on 2/16. DD 2/16,	No FOC = Invalid CNR In addition, with respect to Qwest's	NO	NO	"A" No FOC = Invalid CNR

[19] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
				jeop was cleared in the field. 2/16 16:04 talked to CLEC who was going to test and call back, but no CLEC callback (as of 17:58) C01 jeop; 2/17 supp to chg DD to 2/22; 2/20 CLEC accepted	"Review": Qwest states 2/16/06 is the "due date," but there is no "due date" for this request because Qwest did not send an FOC with the new due date.[20] Qwest did not notify Eschelon that Qwest had cleared the Qwest jeopardy condition.			
15. MN660526T1FAC	17197449	Releasing FOC for K I jep never sent. Qwest applied invalid CNR jeopardy	MN	N49735347	Sent K17 on 3/24 at 13:10. Then at 18:01 B33jeop sent followed by a C01 jeop on 3/24/06; 3/24 1 3:35. Talked to [ER] at Eschelon advised end user needs to provide ground. C01 jeop EU needs	No FOC = Invalid CNR In addition, with respect to Qwest's "Review": Although Qwest admits CNR was invalid, it gives only one of the reasons why it was invalid. The other is that Qwest sent no FOC after the facility jeopardy. [21]	YES	NO	"C" No FOC = Invalid CNR Companies agree "CNR" was in-appropriate

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[20] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

[21] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
					to provide ground; K18 jeop to recover prs; CNR jeopardy posted in error due to pair recovery issue. 3/30 CLEC accepted	Qwest admits in its review that it posted the customer jeopardy (C01) in error.			
16. MN659573T1FAC	17223262	Releasing FOC for K I jep never sent. Qwest applied invalid CNR jeopardy	MN	N50018967-70	3/27 sent K17 jeopardy for 2 orders. 3/27 K18 jeop on another order. No FOC. 3/28 C01 jeop. 3/28 13:44 called CLEC, referred to [ER]. 13:53 said to jeop back to Escelon they are not ready. 3/29 supp to chg DD to 4/3; 3/30 ref'd to CLEC; 3/31 CLEC accepted	No FOC = Invalid CNR

In addition, with respect to Qwest's "Review": Eschelon requested a due date of 3/28/06. Qwest did not send Eschelon an FOC releasing the orders from Qwest facility jeopardies (K-17 and K18).[22] | NO | NO | "A"

No FOC = Invalid CNR |
| 17. OR668544T1FAC | 17301788 | Releasing FOC for K I jep never sent. Qwest applied invalid CNR | OR | N50692388 | 4/l4 sent Kl7 jeop 3pm. No FOC. DD | No FOC = Invalid CNR | NO | NO | "A"

No FOC = |

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[22] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, ***we will advise you of the new DD when the jeopardy condition has been resolved.*** This is usually within 72 hours.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
		jeopardy			4/14/06; 4/l4 refd l5:30 referred to [ER] at Eschelon, but no callback; C01 posted. 4/21 supp to chg DD to 4/26; 4/24refd to CLEC & CLEC accepted	In addition, with respect to Qwest's "Review": Qwest said 4/14/06 is the "due date" but there was no "due date" for this request because Qwest did not send an FOC with the new due date.[23]			Invalid CNR
18. WA696462T1FAC	17804830	Releasing FOC for K I jep never sent. Qwest applied invalid CNR jeopardy	WA	N55399841	6/7 sent K18 jeop at 8:55. Jeopardy resolved later in the day on due date (6/7) DD 6/7/06. 6/7 16:45 tried to ref CLEC [PHONE NUMBER REDACTED] but Ring No Answer. C01 jeop; 6/8 DD chg to 6/13; 6/8 CLEC accepted	No FOC = Invalid CNR

In addition, with respect to Qwest's "Review": Qwest said 6/7/06 was the "due date" but there was no "due date" for this request because Qwest did not send an FOC with the new due date.[24] Qwest has multiple Eschelon contact numbers and knows that voice mail is available. Qwest | NO | NO | "A"

No FOC = Invalid CNR |

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[23] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

[24] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
						may have misdialed if it got a ring no answer and should have tried again or tried another of the readily available Eschelon numbers.			
19. CO689077T1FAC	17705435	Releasing FOC not sent the day prior to DD Qwest applied an invalid CNR jeopardy	CO	N55328894	5/25 17:18 Kl8 jeop was sent. K17 also sent at 18:01. 5/26 FOG sent at 12:36pm with DD 5/26/06. 5/25 19:12 called CLEC left voice mail was ready to test (day before the DD) 5/26 16:47 no CLEC callback jeop C01; 5/30 supp to chg DD to 6/2; 5/20 refd to CLEC & CLEC accepted	No FOC Day Prior = Invalid CNR In addition, with respect to Qwest's "Review": Qwest called Eschelon *after business hours* the day *before the due date*. Qwest sent Eschelon an FOC for 5/26/06, not 5/25/06. Qwest inappropriately applied a CNR jeopardy because Qwest should have contacted Eschelon on the due date.	NO	YES	"B" No FOC *Day Prior* = Invalid CNR
20. CO702280T1FAC	17929677	Releasing FOC not sent the day prior to DD Qwest applied an invalid CNR jeopardy	CO	N57492344	6/20 at 15:48 Kl7jeop issued. 6/22 1 3:00 send FOG with DD	No FOC Day Prior = Invalid CNR In addition, with respect to Qwest's	NO	YES	"B" No FOC *Day Prior* = Invalid

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
				6/22/06. 6/22 K43 discovered and missed due to Qwest reasons; 6/23 13:04 called [ER] at Eschelon, talked to [ER] advised ready to test and accept. 6/26 9:17 no response from CLEC. 6/26 9:20 pending acceptance Pete. 6/27 supp to chg DD to 6/29; 6/28 CLEC accepted		"Review": ***Qwest missed Eschelon's requested due date*** because of a Qwest facility jeopardy. Because Qwest then classified it as CNR, Qwest's missed due date will not count against its performance in the PIDs. Qwest did not send Eschelon an FOC releasing the order from the second Qwest facility jeopardy (K43 jeopardy).[25]			CNR
21. AZ716331T1FAC	18253036	Releasing FOC not sent the day prior to DD Qwest applied an invalid CNR jeopardy	AZ	N59678376	Sent K17 jeop 7/24. FOG 7/27 13:00 for a DD of 7/27/06. 7/27 V25 jeop sent. Missed the due to Qwest	No FOC Day Prior = Invalid CNR In addition, with respect to Qwest's "Review": Qwest ***missed Eschelon's requested***	NO	NO Qwest Error	"A" No FOC *Day Prior* = Invalid CNR See end

[25] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, ***we will advise you of the new DD when the jeopardy condition has been resolved.*** This is usually within 72 hours.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
				reasons on 7/27 and coded original due date miss to Qwest. No FOG. 7/28 1 2:44 refd to [ER] but no CLEC callback and a subsequent C0l jeop posted on 7/28. 7/31 supp to cng DD to 8/3; 8/2 refd to CLEC & CLEC accepted		*due date* and Qwest did not send Eschelon an FOC releasing the order from the second Qwest facility jeopardy (V25 jeopardy).[26]			note iv to KEY above regarding Qwest's note ("Qwest error) in previous column
22. AZ719081T1FAC	18386264	Releasing FOC for K 1 jep never sent. Qwest applied invalid CNR jeopardy	AZ	N61499633	8/4 11:26 Kl7 jeop issued. 8/8 18:04 Kl7 jeop issued. 8/9 11:36 Kl7jeop issued. 8/9 two more jeopardies issued. DD 8/9/06. jeopardy issue resolved on the due date. 8/9 tried to call CLEC 17:22.	No FOC = Invalid CNR In addition, with respect to Qwest's "Review": Qwest admits it posted this jeopardy in error. It appears that Qwest admits the error because it called after business hours (without also recognizing it was an	YES	NO Possible Qwest Error	**"C"** No FOC = Invalid CNR Companies agree "CNR" was in-appropriate See end note iv to KEY above

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[26] *See* http://www.qwest.com/wholesale/clecs/provisioning.html: Qwest's Provisioning and Installation overview V94.0 PCAT documented process says (emphasis added): "If the column contains "Yes" and Qwest has the responsibility to resolve the jeopardy condition, *we will advise you of the new DD when the jeopardy condition has been resolved.* This is usually within 72 hours.

ESCHELON DATA (FROM BJJ-6)				"QWEST REVIEW"[1] (FROM MN RA-30 – COPIED IN BJJ-35)		ESCHELON REVIEW[2] (FROM BJJ-35)	FROM RA-28RT	FROM RA-28RT	Eschelon review of RA-28RT
PON	LSR ID	Reason for Invalid Customer Not Ready (CNR) Jeopardy	ST	Order #			CNR Jeopardy in Error?	FOC Sent after original Jeopardy?	*SEE* KEY AT END FOR "A" – "C"
					GO1 jeopardy posted in error.	error because there was no FOC).			regarding Qwest's note ("Qwest error) in previous column

FOR KEY – SEE COVER PAGES (pages i-ii)