

**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-51

TO THE

SURREBUTTAL TESTIMONY OF BONNIE J. JOHNSON

ON BEHALF OF ESCHELON TELECOM, INC.

APRIL 3, 2007

**Example of Eschelon Oversight Committee Meeting Request:
Meeting Minutes**

This document includes excerpts from Qwest-prepared CMP Redesign Meeting Minutes, as well as excerpts from the CMP Document. It also includes URLs to the complete documents from which the excerpts were taken. Following the excerpts there is a Eschelon-Qwest email exchange in which, despite Qwest’s documented July 2001 commitment in CMP Redesign “to provide minutes from each CICMP meeting and ad hoc meetings/calls,” Qwest said “Qwest believes that minutes for ad hoc meetings associated with a change to disposition request are not required under the current CMP Document. The Eschelon-Qwest email exchange also includes Eschelon’s request for Oversight Committee review.

Excerpt from July 2001 CMP Redesign Meeting Minutes:

“MEETINGS

Qwest has committed to provide minutes from each CICMP meeting and ad hoc meetings/calls. The minutes will include summaries of the discussions and issues from the meeting. Each CLEC will designate a primary and alternate Change Management point-of-contact who will serve as the official designees for matters regarding the Change Management Process.

- **DECISION:** Qwest committed to provide minutes from each CICMP meeting and ad hoc meetings/calls.
- **DECISION:** Primary point-of-contact is the official voting member, and a secondary (alternate) point-of-contact can vote in the absence of the primary contact.”

Available at:

http://www.qwest.com/wholesale/downloads/2001/010821/CMP_July19_Mtg_Minutes_FINAL_Rev_14aug2001.doc

Excerpt from April 2002 CMP Redesign Meeting Minutes:

“#111 Menezes-AT&T stated that they are getting meeting minutes for everything and the gap could be closed. Clauson-Eschelon stated that the team needed agendas and meeting minutes for all meetings. Gap analysis item #111 closed.”

Available at:

http://www.qwest.com/wholesale/downloads/2002/020715/CMP_RedesignMeetingMinutesApril2-4FINAL07-15-02.doc

Excerpt from August 2002 Gap Analysis Document – Gap Analysis for Gap #111:

“111	Meetings-Minutes	AT&T	Does the provision in the Master Redline, page 54 (Meeting Minutes), mean the Qwest will prepare minutes from the monthly meetings as well as any
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			<p>other meetings held by the CMP group? How about clarification calls? Is there any CMP-related meeting for which minutes would not be taken? We should clarify the language to make clear when minutes will be taken. If there are minutes, are they just posted on the web or are they distributed by e-mail to just the participants/the entire CMP distribution? Does it depend on the meeting?</p> <p>[CLOSED 4/3/02: Refer to Master Redlined framework]</p>
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Available at:

<http://www.qwest.com/wholesale/downloads/2002/020805/CombinedCMPRedesignGapAnalysisRev08-01-02.doc>

Excerpt from September 2002 CMP Redesign Meeting Minutes:

“The team then reviewed all occurrences of the word “meeting(s) and determined that the appropriate deliverables were outlined for all meetings, i.e., minutes, distribution materials, and other deliverables. Language was added under “Additional Meetings” in Section 3.0 to clarify that minutes would be distributed.”

Available at:

http://www.qwest.com/wholesale/downloads/2002/021108/CMP_RedesignMeetingMinutes_9_12-13F_11-6-02.doc

Excerpt from September 2002 CMP clean up document – Sections 3.0, 3.1 and 3.2 clean up resulting from the September 2002 Redesign Meeting:

“3.0 CHANGE MANAGEMENT PROCESS MEETINGS

Change Management Process meetings will be conducted on a regularly scheduled basis, at least two (2) consecutive days on a monthly basis. Meeting participants can choose to attend meetings in person or participate by conference call.

Meetings are held to review, ~~prioritize,~~ manage the implementation of Product/Process and System changes, and address eChange management requests. Qwest will review the status of all applicable Change Requests. The meeting may also include discussions of Qwest’s OSS Interface Release Calendar development view.

CLEC’s request for additional agenda items and associated materials ~~must~~should be submitted to Qwest at least five (5) business days by noon (MT) in advance of the meeting. Qwest is responsible for distributing the agenda and associated meeting materials ~~at least three (3) business days by noon (MT) in advance of the meeting.~~ [REDAUNDANT TO 3.1] and Qwest will be responsible for preparing, maintaining, and distributing meeting minutes. Attendees with any walk-on items should bring hard copy materials of the walk-on items to the meeting and should, at least two (2) hours prior to the meeting, provide copies of such materials electronically (soft copy) to the CMP Manager, cmpcr@qwest.com, for distribution to all parties.

All attendees, whether in person or by phone, must identify themselves and the company they represent.

Additional meetings may be held at the request of Qwest or any CLEC. Meeting notification must contain an agenda plus any supporting meeting materials. ~~Notification for these~~ ~~These~~ meetings ~~will should be distributed announced~~ at least five (5) business days prior to their occurrence. ~~Exceptions may be made for emergency situations.~~ Qwest will record and distribute meeting minutes, unless otherwise noted in this CMP.

3.1 Meeting Materials [Distribution Package] for Monthly Change Management Process Meetings [AT&T Note: ~~does this section really only apply to monthly meetings? There should be some standard for all meetings~~]

Meeting materials ~~should~~ will include the following information:

- Meeting Logistics
- Minutes from previous meeting
- Agenda
- Change Requests and responses, as applicable
- New/Active
- Updated
- ~~Log~~
- Issues, Action Items Log and associated statuses
- Release Summary, as applicable
- OSS Interface Release Calendar, as described in Section 6.0
- ~~12 Month Development View~~ [AT&T Note: ~~Redundant to previous bullet~~]
- ~~Monthly System Outage Report~~ Date TBD Trouble Tickets, as described in Section 12.3
- Any other material to be discussed

Qwest will provide Meeting Materials (~~d~~Distribution ~~p~~Package) electronically, by noon (MT), three (3) business days prior to the Monthly CMP Meeting. In addition, Qwest will provide hard copies of the ~~d~~Distribution ~~p~~Package at the Monthly CMP Meeting.

3.2 Meeting Minutes for Monthly Change Management Process Meetings [AT&T Note: ~~Qwest writes minutes for all meetings, not just monthly meetings. Relates to Gap 111.~~]

Qwest will take minutes. Qwest will summarize discussions in meeting minutes and include any revised documents such as ~~t~~issues, ~~A~~action items and statuses.

Minutes ~~should~~ will be distributed to meeting participants for comments or revisions no later than five (5) business days by noon (MT) after the meeting. CLEC comments ~~should~~ will be provided ~~within by noon (MT) two (2) business days after receiving draft minutes by noon (MT) to the Qwest CMP Manager~~. Revised minutes, if CLEC comments are received, ~~should~~ will be distributed ~~posted~~ to the CMP Web site within nine (9) business days by noon (MT) after the meeting. [AT&T Note: ~~"Should" appears in several places in the CMP document. It should be replaces with "will" or "shall"~~]

Available at:

http://www.qwest.com/wholesale/downloads/2002/020918/CLEANUPQwestWholesaleCMP_09_13_02.doc

Excerpt from Current CMP Document Sections 3.0, 3.1 and 3.2 – No Change from September 2002 Clean Up Document (see above):

“3.0 CHANGE MANAGEMENT PROCESS MEETINGS

Change Management Process meetings will be conducted on a regularly scheduled basis. The CMP Product/Process and Systems Meetings will be conducted on the same day of each month or on at least two (2) consecutive days on a monthly basis, unless other arrangements are agreed upon by the CLECs and Qwest. Meeting participants can choose to attend meetings in person or participate by conference call.

Meetings are held to review, manage the implementation of Product/Process and System changes, and address Change Requests. Qwest will review the status of all applicable Change Requests. The meeting may also include discussions of Qwest's OSS Interface Release Calendar.

CLEC's request for additional agenda items and associated materials must be submitted to Qwest at least five (5) business days by noon (MT) in advance of the meeting. Qwest is responsible for distributing the agenda and associated meeting materials and will be responsible for preparing, maintaining, and distributing meeting minutes. Attendees with any walk-on items should bring hard copy materials of the walk-on items to the meeting and should, at least two (2) hours prior to the meeting, provide copies of such materials electronically (soft copy) to the CMP Manager, cmpcr@qwest.com, for distribution to all parties.

All attendees, whether in person or by phone, must identify themselves and the company they represent.

Additional meetings may be held at the request of Qwest or any CLEC. Meeting notification must contain an agenda plus any supporting meeting materials. Notification for these meetings will be distributed at least five (5) business days prior to their occurrence. Qwest will record and distribute meeting minutes, unless otherwise noted in this CMP.

3.1 Meeting Materials (Distribution Package) for Monthly Change Management Process Meetings

Meeting materials will include the following information:

- Meeting Logistics
- Minutes from previous meeting
- Agenda
- Change Requests and responses, as applicable
 - New/Active
 - Updated
- Issues, Action Items Log and associated statuses
- Release Summary, as applicable
- OSS Interface Release Calendar, as described in Section 6.0
- Date TBD Trouble Tickets, as described in Section 12.3
- Any other material to be discussed

Qwest will provide Meeting Materials (distribution package) electronically, by noon (MT), three (3) business days prior to the Monthly CMP Meeting. In addition, Qwest will provide hard copies of the distribution package at the Monthly CMP Meeting.

3.2 Meeting Minutes for Change Management Process Meetings

Qwest will take minutes. Qwest will summarize discussions in meeting minutes and include any revised documents such as issues, action items and statuses.

Minutes will be distributed to meeting participants for comments or revisions no later than five (5) business days by noon (MT) after the meeting. CLEC comments will be provided by noon (MT) two (2) business days after receiving draft minutes to the Qwest CMP Manager, cmpcr@qwest.com. Revised minutes, if CLEC comments are received, will be posted to the CMP Web site within nine (9) business days by noon (MT) after the meeting.”

Available at:

http://www.qwest.com/wholesale/downloads/2007/070304/QwestWholesaleChangeManagementDocument_03_05_07.doc

See next page for Qwest-Eschelon email exchange

QWEST-ESCHELON EMAIL EXCHANGE:

From: Stecklein, Lynn [Qwest; Contact Information Redacted]
Sent: Tuesday, October 31, 2006 2:07 PM
To: Johnson, Bonnie J.; Isaacs, Kimberly D.; sue.wright[Contact Information Redacted]; Fredricksen, Laurie; Tom Hyde
Subject: Maintenance and Repair and Dispatch meeting description

Attached you will find the meeting description associated with the meeting held on October 10, 2006 to discuss objections on **PROS.09.27.06.F.04212.Dispatch_and_MR_Overview**.

Qwest is providing a more detailed description of the October 10, 2006 ad hoc meeting as an accommodation to Eschelon. Qwest believes that minutes for ad hoc meetings associated with a change to disposition request are not required under the current CMP Document and Eschelon's reference to the July 2001 meeting in which Qwest stated it would provide minutes for ad hoc meetings on the creation of the CMP Document did not create an obligation for all ad hoc meetings. As we pointed out, Section 3 does not provide that. As Eschelon is well aware, Qwest has not in the past provided minutes for all change to disposition request meetings and Eschelon has not objected to this practice in the past. Nonetheless, Qwest has scheduled an ad hoc meeting on November 2, 2006 to discuss Eschelon's proposal for adding a new requirement for ad hoc meeting minutes in the CMP Document.

Thanks,

Lynn Stecklein
Qwest Wholesale CRPM

From: Johnson, Bonnie J.
Sent: Wednesday, November 01, 2006 9:18 AM
To: 'cmpesc@qwest.com'; 'mark.coyne [Qwest; Contact Information Redacted]'; 'lhankins[Contact Information Redacted]'; 'klee[Contact Information Redacted]'; 'becky.quintana[Contact Information Redacted]'; 'Karen.johnson[Contact Information Redacted]'
Cc: Johnson, Bonnie J.; Isaacs, Kimberly D.
Subject: Eschelon Telecom/CMP OVERSIGHT REVIEW ISSUE SUBMISSION - Meeting minutes

Eschelon submits this issue relating to Qwest's failure to adhere to CMP for Oversight Review per Section 18.0 of the CMP document. Qwest is failing to provide meeting minutes for all CMP meetings (specifically ad hoc meetings), as required by Section 3.0 of the CMP document and per Qwest's commitment in CMP Redesign to do so. Qwest has, at times, provided minutes for ad hoc CMP meetings, but its compliance has not been consistent and appears to be worse lately. Excerpts from the Qwest-Eschelon email exchanges to date on this issue are copied below.

On October 12, 2006 Eschelon asked Qwest when Qwest would be providing meeting minutes for an ad hoc call held on October 10, 2006 regarding tagging at the demarc and dispatch. Qwest did not provide meeting minutes. Instead, Qwest provided one paragraph indicating that Qwest will review the PCATs and hold another meeting.

Eschelon provided Qwest the language in 3.0 of the CMP document requiring Qwest to provide meeting minutes. Section 3.0 of the CMP Document is also available at: http://www.qwest.com/wholesale/downloads/2006/061030/QwestWholesaleChangeManagementDocument_10_30_06.doc. Section 3.0 requires Qwest to provide meeting minutes. It states

(with emphasis added): "**Additional meetings may be held at the request of Qwest or any CLEC.** Meeting notification must contain an agenda plus any supporting meeting materials. Notification for these meetings will be distributed at least five (5) business days prior to their occurrence. **Qwest will record and distribute meeting minutes, unless otherwise noted in this CMP.**" This is the provision of the CMP Document under which ad hoc meetings are held, and yet Qwest does not consistently distribute meeting minutes.

Eschelon also provided Qwest with the final meeting minutes from the July 19, 2001 CMP redesign meeting. Those meeting minutes are also available at: http://www.qwest.com/wholesale/downloads/2001/010821/CMP_July19_Mtg_Minutes_FINAL_Rev_14aug2001.doc. The minutes state (with emphasis added): "**Qwest has committed to provide minutes from each CICMP meeting and ad hoc meetings/calls. The minutes will include summaries of the discussions and issues from the meeting.** Each CLEC will designate a primary and alternate Change Management point-of-contact who will serve as the official designees for matters regarding the Change Management Process. · DECISION: Qwest committed to provide minutes from each CICMP meeting and ad hoc meetings/calls." This decision was documented in Section 3.0 of the CMP Document. Qwest cannot change this commitment without a unanimous vote to change the CMP Document, which Qwest has not requested. Eschelon does not favor any change in the CMP Document. The proper course is for Qwest to consistently adhere to Section 3.0's requirement to provide meeting minutes for each ad hoc meeting/call.

On October 26, 2006, Eschelon submitted the following request to Qwest:

"Eschelon requests that the following item be added to the agenda for the ad hoc call regarding CMP meeting minutes:

--Qwest use of notifications as meeting minutes substitutes, when notifications are not subject to comment and posting of comments

A recent example is Qwest's October 25, 2006 notification (CMPR.10.25.06.F.04292. Ad_Hoc_Meeting_Dispatch) regarding tagging at the demarcation point. In the notification, Qwest said the companies agreed to redlining the PCAT, when in fact Qwest simply announced its intent to do so rather than ask for agreement. In addition, Qwest said it was removing inconsistencies in the PCAT when the companies did not agree there were inconsistencies. Qwest presented this information as having been discussed in the October 11, 2006 ad hoc call. If Qwest had provided meeting minutes for the October 11, 2006 ad hoc call, as required by Section 3.0 of the CMP Document, CLECs would have had an opportunity to comment on the minutes and those comments would then be posted to the website. By substituting commentary in the notification for minutes, Qwest avoids this meeting minute comment process. There is no process for a CLEC to comment upon this type of notification that would result in the posting of the CLEC's comments. Qwest needs to place any recap of meeting discussions in minutes that can be commented upon and not in notifications. Eschelon asks Qwest to comply with the CMP Document's requirement to provide meeting minutes for CMP meetings, including ad hoc calls. If, after the call on November 2nd, Qwest still will not do so, Eschelon will take this issue to the Oversight Committee."

On October 31, 2006, three weeks after the tag at the demarc call and 19 days after Eschelon requested meeting minutes, Qwest provided a document that does not conform to the meeting minutes format used for CMP monthly meetings and specifically is in a format that precludes any changes to the document. In the subject line of the email, Qwest described the minutes as a "meeting description." Qwest did not refer to the attached PDF document as meeting minutes, as the CMP Document requires. In the email, Qwest said: "Qwest believes that minutes for ad hoc meetings associated with a change to disposition request are not required under the current CMP Document and Eschelon's reference to the July 2001 meeting in which Qwest stated it would

provide minutes for ad hoc meetings on the creation of the CMP Document did not create an obligation for all ad hoc meetings. As we pointed out, Section 3 does not provide that. As Eschelon is well aware, Qwest has not in the past provided minutes for all change to disposition request meetings and Eschelon has not objected to this practice in the past. Nonetheless, Qwest has scheduled an ad hoc meeting on November 2, 2006 to discuss Eschelon's proposal for adding a new requirement for ad hoc meeting minutes in the CMP Document." Qwest's use of the PDF format to prevent changes, which is not how CMP minutes are provided to CLECs, so short in time after receiving Eschelon's request to be able to redline the minutes and have their comments posted creates a question as to Qwest's basis for using PDF. The use of PDF precludes the very redlining described and requested by Eschelon only days before Qwest issued its document in the limiting PDF format. As Qwest acted in this manner, Eschelon is taking this issue to the Oversight Committee now, rather than waiting until after the November 2nd call. The issue needs to be addressed.

Eschelon was present at the CMP Redesign meeting and, in any event, the minutes and the CMP Document speak for themselves. The CMP Document clearly requires minutes for all ad hoc calls. There are no exceptions for any ad hoc meetings described in either the CMP Redesign meeting minutes reflecting the discussion of the subject or in the CMP Document. To the contrary, the discussion in the CMP Redesign meeting minutes specifically states that minutes will be provided for "each" CICMP and ad hoc meeting. Qwest's October 31, 2006 email, states incorrectly that Eschelon is "proposing adding a new requirement for ad hoc meeting minutes in the CMP Document." The CMP Document and the CMP meeting minutes show that this statement is untrue, as the requirement pre-dates the CMP Document and is included in the CMP Document. There is no provision in the CMP Document for changing the document by failing to comply with it consistently. As discussed, Qwest cannot change this commitment without a unanimous vote to change the CMP Document. Unless and until it obtains such a vote, it needs to provide minutes (like the minutes provided for the monthly meetings) for each ad hoc meeting.

Eschelon does not need to update or change the CMP document. The language that Qwest is required to provide meeting minutes is very clear. If Qwest desires to change its requirement to provide meeting minutes for all ad hoc meetings, then it is Qwest, not Eschelon, who will need to make that request and obtain a unanimous vote to implement that change in the CMP document. Eschelon's desired resolution is that Qwest consistently provide meeting minutes (like the minutes provided for the monthly meetings) for each ad hoc meeting.

Supporting documentation:

http://www.qwest.com/wholesale/downloads/2006/061030/QwestWholesaleChangeManagementDocument_10_30_06.doc

"Additional meetings may be held at the request of Qwest or any CLEC. Meeting notification must contain an agenda plus any supporting meeting materials. Notification for these meetings will be distributed at least five (5) business days prior to their occurrence. Qwest will record and distribute meeting minutes, unless otherwise noted in this CMP."

http://www.qwest.com/wholesale/downloads/2001/010821/CMP_July19_Mtg_Minutes_FINAL_Rev_14aug2001.doc

"MEETINGS

Qwest has committed to provide minutes from each CICMP meeting and ad hoc meetings/calls. The minutes will include summaries of the discussions and issues from the meeting. Each CLEC

will designate a primary and alternate Change Management point-of-contact who will serve as the official designees for matters regarding the Change Management Process.

DECISION: Qwest committed to provide minutes from each CICMP meeting and ad hoc meetings/calls.

DECISION: Primary point-of-contact is the official voting member, and a secondary (alternate) point-of-contact can vote in the absence of the primary contact."