

**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 DD-17 (UPDATED)**

**TO THE**

**SURREBUTTAL TESTIMONY OF DOUGLAS DENNEY**

**ON BEHALF OF ESCHELON TELECOM, INC.**

**APRIL 3, 2007**

## CFA Change Chronology for Limit of One

- **9/11/06:** Qwest issues Level 3 CMP Notice (PROS.09.11.06.F.04161.P\_&\_I\_Overview\_V91) with an effective date of 10/26/06. This notice limited the CFA changes to one on the day of the cut.

Link to notice PROS.09.11.06.F.04161.P\_&\_I\_Overview\_V91 (also attached):  
[http://www.qwest.com/wholesale/cnla/uploads/PROS.09.11.06.F.04161.P\\_&\\_I\\_Overview\\_V91.doc](http://www.qwest.com/wholesale/cnla/uploads/PROS.09.11.06.F.04161.P_&_I_Overview_V91.doc)

- **10/18/2006** Change Disposition of P&I CFA Changes (PROS.09.11.06.F.0461.P\_&\_I\_Overview\_V91) was included as a Walk On Agenda Item for the October 18, 2006 Product and Process CMP Meeting. Eschelon's email objecting to the level of disposition of notice PROS.09.11.06.F.04161.P\_&\_I\_OverviewV91 as well as an excerpt from the 10/18/06 CMP Minutes discussing the request to change the level of the notice are attached.

Link to October Product Process CMP Meeting Minutes (Found in Attachment A) (also attached):  
[http://www.qwest.com/wholesale/calendar/attachments/NovemberProdProcDistributionPackage\\_34.pdf](http://www.qwest.com/wholesale/calendar/attachments/NovemberProdProcDistributionPackage_34.pdf)

- **10/20/06:** Qwest issues a Level 1 CMP notice (PROS.10.20.06.F.04281.Retract\_CFA\_P&I\_OvrwV91), effective immediately. This notice retracted the Level 3 notice issued on 9/11/06.

Link to Notice PROS.10.20.06.F.04281.Retract\_CFA\_P&I\_OvrwV91 (also attached):  
[http://www.qwest.com/wholesale/cnla/uploads/PROS.10.20.06.F.04281.Retract\\_CFA\\_P&I\\_OvrwV91.doc](http://www.qwest.com/wholesale/cnla/uploads/PROS.10.20.06.F.04281.Retract_CFA_P&I_OvrwV91.doc)

- **10/26/2006:** Qwest issues MCC Notice (PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA effective 11/1/2006), with an effective date of 11/1/06. This notice explained that Qwest is still intending to hold the CLEC to one CFA change on the due date, but directs Qwest's Testers to "remain flexible and use their best judgment to determine if it is reasonable to expect the next CFA change to resolve the issue" and if Qwest's personnel decide that this expectation is not reasonable, the "CFA change should be refused and the CLEC should be pointed to the supplemental process." Qwest's notice also states that "If Qwest receives frequent attempts from a CLEC to verbally request numerous changes on DD before a good CFA is found, the Tester should post a

Customer Jeopardy to the order and contact the CLEC's Service Manager to inform them of the situation.”

Link to Notice: PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA (also attached):

<http://www.qwest.com/wholesale/cnla/uploads/PROS%2E10%2E26%2E06%2EF%2E04290%2EMCC%5FVerbal%5FSUPP%5FCFA%2Edoc>

- **10/31/2006:** Eschelon sends email to Qwest asking Qwest to retract PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA (Email Attached). Eschelon explains that Qwest's 10/26/06 notice, which effectively limits CFA changes to one per circuit on the day of the cut, is a change in process and should be issued as a Level 4 CMP change request. Eschelon also explains that limiting CFA changes on the day of the cut to one per circuit was not Qwest's intent and that Qwest has been performing multiple CFA changes for four years. In Eschelon's response, Eschelon said:

“CR 5548229 was implemented and completed in August of 2002. Although Qwest is now claiming that Qwest had always intended to limit CFA changes to one per circuit, since the process was implemented *more than four years ago*, Qwest has been performing multiple CFA changes for CLECs. CR 5548229 and the Qwest PCAT do not limit verbal CFA changes on the due date to one per circuit. In fact, an example used for purposes of implementing the CR contains multiple changes to one CFA (See [http://www.qwest.com/wholesale/cmp/archive/CR\\_5548229.htm](http://www.qwest.com/wholesale/cmp/archive/CR_5548229.htm) ). Therefore it is clear from the face of the CR's status history that the intent was not to limit this to one.”

Eschelon's 10/31/06 email requesting retraction of Qwest's MCC notice is attached.

- **11/15/2006** MCC Retraction Request (PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA) is included as a Walk On Agenda Item for the November 15, 2006 Product and Process CMP Meeting.

Link to November 15, 2006 Product and Process CMP Meeting Minutes (excerpt from CMP Minutes discussing Eschelon's retraction request of this notice is attached):

[http://www.qwest.com/wholesale/calendar/attachments/CMPMeetingMinutesSystems2006-11-15\\_34.pdf](http://www.qwest.com/wholesale/calendar/attachments/CMPMeetingMinutesSystems2006-11-15_34.pdf)



**Announcement Date:** September 11, 2006  
**Proposed Effective Date:** October 26, 2006  
**Document Number:** PROS.09.11.06.F.04161.P\_&\_I\_Overview\_V91  
**Notification Category:** Process Notification  
**Target Audience:** CLECs, Resellers  
**Subject:** CMP - Provisioning and Installation Overview - V91.0  
**Level of Change:** Level 3

**Summary of Change:**

On September 11, 2006, Qwest will post planned updates to its Wholesale Product Catalog that include new/revised documentation for Provisioning and Installation Overview. These will be posted to the Qwest Wholesale Document Review Site located at <http://www.qwest.com/wholesale/cmp/review.html>

Updates are associated with a change to verbal supplement for CFA slot changed on the due date. In the Provisioning Points of Interface section under Provider Initiated Activity (PIA), Qwest will be providing additional language which describes the Qwest and CLEC responsibilities for CFA or slot changes.

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/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 September 11, 2006
CLEC Comment Cycle on Documentation	Beginning September 12, 2006

Begins	
CLEC Comment Cycle Ends	5:00 PM, MT September 26, 2006
Qwest Response to CLEC Comments (if applicable)	Available October 11, 2006 <a href="http://www.qwest.com/wholesale/cmp/review_archive.html">http://www.qwest.com/wholesale/cmp/review_archive.html</a>
Proposed Effective Date	October 26, 2006

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>

**From:** Johnson, Bonnie J. [mailto:email redacted]  
**Sent:** Monday, September 25, 2006 8:07 AM  
**To:** Bonnie Johnson; [Qwest CMP email redacted]  
**Cc:** Isaacs, Kimberly D.; Johnson, Bonnie J.  
**Subject:** Request change to level/Change to CFA Change Process Process Notice:  
Interconnection: GN: CMP - Provisioning and Installation Overview V91: Effective 10-26-06  
**Importance:** High

Eschelon object to this notice. CFA issues have been part of ICA negotiations and are being arbitrated. Qwest is using CMP as a litigation tactic. If Qwest has a proposal, it should make it in negotiations.

If Qwest pursues this change and does so through CMP, please change the level designation to level 4. Qwest's proposed change, per 5.4.5 of the CMP document, is "Limiting the availability and applicability or functionality of an existing product or existing feature" and is a level 4 change. Qwest is limiting the use of a process which has a significant impact to CLECs.

Thanks,

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

**From:** New Cr, Cmp [Qwest CMP email redacted]  
**Sent:** Monday, September 25, 2006 11:47 AM  
**To:** Johnson, Bonnie J.; [Qwest CMP email redacted]  
**Cc:** Isaacs, Kimberly D.  
**Subject:** RE: Request change to level/Change to CFA Change Process Process Notice:  
Interconnection: GN: CMP - Provisioning and Installation Overview V91: Effective 10-26-06

Hi Bonnie,

Qwest has received your request on Process Notice: Interconnection: GN CMP - Provisioning and Installation Overview V91. We will be meeting internally to determine next steps.

Thanks,

Lynn Stecklein  
Qwest Wholesale CRPM

**The following is an excerpt from the the 10/18/06 CMP Minutes that discusses Eschelon's request to change the level of Qwest notice PROS.09.11.06.F.04161.P\_&\_I\_Overview\_V91.**

**Walk On Items**

**Change Disposition for P&I CFA Changes**

**(PROS.09.11.06.F.04161.P\_&\_I\_OverviewV91)**

Susan Lorence-Qwest stated that there was a request to change the disposition on a September 11th Level 3 Notice for an update to the Provisioning & Installation PCAT. Susan stated that Eschelon requested that the Notice be changed to a Level 4. Susan then noted that Qwest issued a delayed response, in order to allow discussion to take place at this CMP Meeting.

Cindy Buckmaster-Qwest stated that there was confusion surrounding this notice and stated that the intent is for when a change to a CFA needed and the request is verbal; when making one CFA change, verbally, on the due date. Cindy stated that the notice was not intended to change the process; it is only to limit a verbal CFA change to one. Cindy then noted that there are times when a CLEC guesses at a CFA that could work. Cindy stated that Qwest is trying to free-up CLECs and the testers and to make sure that the CFAs are working CFAs.

Kim Isaacs-Eschelon stated that she understood the intent of the notice and stated that Qwest believes that the process was set-up as 1 verbal CFA. Kim stated that in reality, that is not the process that Qwest and the CLECs are following. Kim noted that in practice, multiple CFA changes are allowed. Kim stated that this notice is limiting the existing process and believes that it should be a Level 4 change. [Comment received from Eschelon: Kim Isaacs-Eschelon stated that she understood the intent of the notice and stated that Qwest may believe that the process was set-up as 1 verbal CFA.]

Cindy Buckmaster-Qwest stated that it is only to clarify the limitation of a verbal CFA change.

Kim Isaacs-Eschelon said that she understood but the Qwest testers do not believe it is just one. Kim said that if this is a change, this needs to be a Level 4, as we are limiting the availability of a process. Kim stated that this is reality, even if it is not the intent. [Comment received from Eschelon: Kim Isaacs-Eschelon said that she understood that was Qwest intent with the notice but the Qwest testers do not believe it is just one. Kim said that this is a change, this needs to be a Level 4, as we are limiting the availability of a process. Kim stated that this is reality, even if it was not Qwest's intent.]

Cindy Buckmaster-Qwest stated that she would hate to get to the point of doing a Level 4 when folks are not following the process. Cindy noted that the PCAT states "a CFA change". Cindy stated that the testers probably stepped out of the process in order to satisfy the customer. Cindy stated that she did not want to take that away. Cindy then stated that she would follow CMP and do whatever needed to be done. Cindy stated that if the testers had to follow hard and fast rules, her concern was what that really meant as far as satisfying the customer.

Susan Lorence-Qwest asked if there was consensus that this is a Level 4 change via a CR. Susan then stated that this could go to a formal vote, if there is a general concern.

Laurie Fredricksen-Integra stated that she is in support of Eschelon. Laurie stated that the function is out there and stated that the CLECs are not randomly selecting CFAs; they assume that the next one is correct.

Cindy Buckmaster-Qwest stated that it is important to point out that most CLECs follow the 1 or 2 CFA. There are a few circumstances where have 5, 6, or 7 CFA changes on the due date. Cindy stated that this ties up the testers and the CLECs. Cindy said that this is where we struggled. Cindy stated that when this was implemented, it was a Level 2 clarification. Cindy noted that she understood that there are personnel out of process and noted that she wants to be flexible enough to satisfy the CLECs. Cindy stated that if this is a Level 4, will have to pull back and stick to one verbal CFA change.

Kim Isaacs-Eschelon asked if the proposed language allows the testers to vary.

Cindy Buckmaster-Qwest stated that we would clarify with the tester that a verbal CFA change can be done once. Cindy stated that there are many opportunities to determine if the CFA is working prior to the due date. Cindy noted that there are some CLECs that wait until the due date to worry about the CFA, find out that the CFA is not good, and then guess at CFAs that might work. Cindy stated that we would go to the testers and tell them that the rule is 1 verbal CFA change, and if the CLEC is desperate for a line and can guarantee that the CFA would work, the tester would help the customer. Cindy stated that Qwest does not want to be hard and tell the testers that only 1 verbal CFA change is allowed. Cindy stated that if that is the direction for Qwest, it would be a process change.

Kim Isaacs-Eschelon suggested that Qwest could pull the language and retract, and deal with the bad players individually. Kim stated that it could be a Level 4 or a retraction of the change. Kim stated that if Qwest feels that a Level 4 would be worse, then retract, and leave the language as is. [Comment received from Eschelon: Kim stated that if Qwest feels that a Level 4 would be would lead to less flexibility between the Qwest and CLEC testers, then retract, and leave the language as is.] Kim then stated that Qwest could deal with the bad players.

Laurie Fredricksen-Integra stated that she wants the testers to have leeway and that the language prohibits that.

Cindy Buckmaster-Qwest stated that the intent was to clarify with the CLECs, and internally, that the intent is 1 verbal CFA change. Cindy stated that Qwest could move forward however the CLECs feel this issue should move. Cindy stated that if this is a Level 4 and should have further discussion, she is okay with that.

Laurie Fredricksen-Integra asked if Qwest would withdraw the change if all understood that the intent is 1 verbal CFA change.

Susan Lorence-Qwest stated that Qwest could send an MCC to remind personnel of the process, and if find that Qwest is not able to handle the problem, Qwest would submit a Level 4 change. Susan stated that Qwest would retract the Level 3, issue an MCC, document externally stating the intent, and remind people to follow the process. Susan



then stated that Qwest would submit a Level 4 if this does not get in control. Susan then asked if everyone was agreeable to the approach.

Kim Isaacs-Eschelon said that it sounded good but that the MCC needed to be internal and external. Kim then stated that she was concerned about the intent and the CLECs responsibility to provide 1 good CFA. Kim stated that she would like it to say that best judgment should be used. Kim then stated that she did not want it to be too restricting. [Comment received from

Eschelon: Kim Isaacs-Eschelon said that it sounded good but that the MCC needed to be internal and external. Kim then stated that she was concerned about Qwest's believe that the of the original change request was based on the CLECs responsibility to provide 1 good CFA. Kim stated that she would like it to say that best judgment should be used. Kim then stated that she did not want the MCC to be too restricting and requested that Qwest communicate that there is flexibility in the process.]

Cindy Buckmaster-Qwest stated that she agreed with Eschelon.

Susan Lorence-Qwest asked if there were any other concerns on the approach. There were no other concerns brought forward.



**Announcement Date:** October 20, 2006  
**Effective Date:** Immediately  
**Document Number:** PROS.10.20.06.F.04281.Retract\_CFA\_P&I\_OvrvwV91  
**Notification Category:** Process Notification  
**Target Audience:** CLECs, Resellers  
**Subject:** CMP – Retract Provisioning and Installation Overview - V91.0  
**Level of Change:** Level 1

On October 20, 2006, Qwest is providing this notification to retract the Level 3 Notice PROS.09.11.06.F.04161.P\_and I\_Overview\_V91 which was announced on September 11, 2006. This proposed documentation update was to the Provisioning and Installation Overview PCAT. Qwest received a CLEC request to change the disposition of this notification to a higher level. To allow time to work on this issue, Qwest issued a Delayed Response to Comments via Notice PROS.10.11.06.F.04254.DelayResp\_Prov\_InstallV91 on October 11, 2006. After discussing the issues in the monthly CMP meeting on October 18, 2006, an agreement was reached between Qwest and the CLEC community to retract this proposed change and to send an internal and external MCC to reinforce the “Verbal supplement for CFA slot change on the Due Date” process.

The proposed updates were associated with a change to verbal supplement for CFA slot changed on the due date. In the Provisioning Points of Interface section under Provider Initiated Activity (PIA), Qwest was going to provide additional language which describes the Qwest and CLEC responsibilities for CFA or slot changes.

The current version of the Provisioning and Installation Overview will remain operational and the document can be found on the Qwest Wholesale Web Site at this URL:

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

**Comment Cycle:**

No formal comment cycle applies. CLECs who feel the change(s) described in this Level 1 notification alter(s) CLEC operating procedures should immediately contact the Qwest CMP Manager, by e-mail, at [cmpcr@qwest.com](mailto:cmpcr@qwest.com).

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>



October 26, 2006

Bonnie Johnson  
 Oregon Telecom Inc  
 730 2nd Ave. South Suite 900  
 Minneapolis, MN 55402  
 bjjohnson@eschelon.com

TO: Bonnie Johnson

**Announcement Date:** October 26, 2006  
**Effective Date:** November 1, 2006  
**Document Number:** PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA  
**Notification Category:** Process Notification  
**Target Audience:** CLECs, Resellers,  
**Subject:** MCC - Verbal supplement for CFA slot change on the Due Date

**Summary of Change or Description of the Activity:**

On October 26, 2006, Qwest will send an MCC notice for Verbal supplement for CFA slot change on the Due Date. This MCC becomes effective on November 1, 2006.

Qwest recently proposed PCAT language to the Provisioning and Installation Overview which was intended to remind CLECs to check their CFAs before assigning them and to clarify that only one (1) verbal supplement for CFA slot change was to be accepted on Due Date (DD). However in discussion with the CLEC community at the Monthly CMP Meeting held on October 18, 2006, this language was not adopted. Instead it was agreed to retract and distribute a MCC both internally and externally to reiterate the current process. See PROS.10.20.06.F.04281.Retract\_CFA\_P&I\_OvrwV91 which was sent on October 20, 2006.

The "Verbal supplement for CFA process" is intended to allow one (1) verbal supplement on DD. However, as customer service is always Qwest priority, in order to maintain the best experience from a customer service perspective, Qwest Testers should remain flexible and use their best judgment to determine if it is reasonable to expect the next CFA change to resolve the issue. If not, the subsequent CFA change should be refused and the CLEC should be pointed to the supplemental process. If Qwest receives frequent attempts from a CLEC to verbally request numerous changes on DD before a good CFA is found, the Tester should post a Customer Jeopardy to the order and contact the CLEC's Service Manager to inform them of the situation.

Related information can be found on the Qwest Wholesale Web site at this URL:  
<http://www.qwest.com/wholesale/clecs/provisioning.html>

If you have any questions or would like to discuss this notice please contact your Qwest Service Manager, Mary Dobesh on (801) 239-5335. Qwest appreciates your business and we look forward to our continued relationship.

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

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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>

cc: Patty Hahn  
Mary Dobesh

Qwest Communications 1600 7th Ave Room 1806 Seattle WA 98008

From: Johnson, Bonnie J. [email redacted]

To: Johnson, Bonnie J. [Qwest CMP CR email redacted]

CC: Johnson, Bonnie J. Isaacs, Kimberly D.

Subject: FW: Process Notice: Interconnection: GN: CMP - MCC Verbal SUPP for CFA on DD: Effective 11-1-06

Sent: Tue 10/31/2006 3:53 PM

Eschelon asks Qwest to retract PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA Title: MCC - Verbal supplement for CFA slot change on the Due Date as an MCC type notice because this is a change in process. An MCC should not be used for changes in process. If Qwest desires a change in process, Qwest should submit a level 4 CR. Eschelon does not agree that the change should be made. Eschelon (Kim) said in the CMP meeting Eschelon would review. Eschelon has done so and this is Eschelon's response.

Qwest issued PROS.09.11.06.F.04161.P\_&I\_OverviewV91 (change to the provisioning and installation PCAT) limiting verbal CFA changes on the day of cut to one per circuit. Eschelon requested a change in disposition to a level four CR because Qwest was attempting to change an existing process. When Qwest and CLECs discussed Eschelon's request in the October CMP meeting, Qwest comments included "Cindy stated that the notice was not intended to change the process; it is only to limit a verbal CFA change to one." Limiting CFA changes to one per circuit on the due date is a change in a process, because Qwest has been providing multiple CFA changes.

CR 5548229 was implemented and completed in August of 2002. Although Qwest is now claiming that Qwest had always intended to limit CFA changes to one per circuit, since the process was implemented **more than four years ago**, Qwest has been performing multiple CFA changes for CLECs. CR 5548229 and the Qwest PCAT do not limit verbal CFA changes on the due date to one per circuit. In fact, an example used for purposes of implementing the CR contains multiple changes to one CFA. (See [http://www.qwest.com/wholesale/cmp/archive/CR\\_5548229.htm](http://www.qwest.com/wholesale/cmp/archive/CR_5548229.htm)). Therefore, it is clear from the face of the CR's status history that the intent was not to limit this to one. As stated in the Qwest October 18<sup>th</sup> CMP meeting minutes: Eschelon (Kim) "stated that she understood the intent of the notice and stated that Qwest may believe that the process was set-up as 1 verbal CFA. Kim stated that in reality, that is not the process that Qwest and the CLECs are following. Kim noted that in practice, multiple CFA changes are allowed. Kim stated that this notice is limiting the existing process and believes that it should be a Level 4 change." While Eschelon was willing to acknowledge that Qwest CMP representatives may now believe that was the intent, Eschelon was clear in saying it was not. Four years of experience and the multiple changes example in the status history shows that the limit is not current process. If Qwest's intention had been to limit CFA changes on the due date to one, Qwest would have issued its "clarification" immediately after the CR was implemented in August of 2002. It did not do so, because that was not the intent. The current process used by Qwest and the CLECs has been in place for over four years. If Qwest wants to change it, Qwest needs to follow the CMP Document and issue a level 4 CR, to which Eschelon will object.

Thanks,

Bonnie Johnson  
Director Carrier Relations  
Eschelon Telecom Inc.

[contact information redacted]

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**From:** [Qwest mailouts2 email redacted]

**Sent:** Thursday, October 26, 2006 3:16 AM

**To:** Johnson, Bonnie J.

**Subject:** Process Notice: Interconnection: GN: CMP - MCC Verbal SUPP for CFA on DD: Effective 11-1-06

**The following is an excerpt from the 11/15/06 CMP Minutes discussing Eschelon's retraction request for Qwest notice PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA:**

**MCC Retraction Request: PROS.10.26.06.F.04290.MCC\_Verbal\_SUPP\_CFA**

Mark Coyne-Qwest stated that Qwest and the CLECs reached an agreement during the October CMP Meeting to send out an internal and external MCC to reinforce the current process and to allow flexibility. He said that the MCC was issued and was effective on 11/1/06. Mark said that Eschelon then requested that the MCC be retracted and asked the CLEC Community what changed from the October CMP Meeting and now.

**(Comments to minutes received from Eschelon - Mark Coyne-Qwest stated that he was not at the October meeting but said Qwest and the CLECs reached an agreement during the October CMP Meeting to send out an internal and external MCC to reinforce the current process and to allow flexibility. He said that the MCC was issued and was effective on 11/1/06. Mark said that Eschelon then requested that the MCC be retracted and Mark asked the CLEC Community what changed from the October CMP Meeting and now.)**

Bonnie Johnson-Eschelon stated that she was not available during the October CMP Meeting. She said that Kim (Eschelon) agreed that she would review internally and that Eschelon does not agree that this change should be made. She said that they feel that limiting CFA changes to one per circuit on the due date is a change in process because Qwest has been providing multiple CFA changes for over 4 years. Bonnie said that if you look at the CR submitted in 2002 by Allegiance, it is clear that the intent was not to limit this to one CFA change and Qwest is now saying that what you have been doing is not appropriate and was not the intent of the CR. Bonnie said that there was never any discussion at CMP associated to the single CFA process and that leaving it up to the discretion of the tester is very concerning and not a good decision. She said that there isn't going to be parity. Bonnie said that this is a change in process and not just a clarification.

**(Comments to minutes received from Eschelon - Bonnie Johnson-Eschelon stated that she was not available during the October CMP Meeting. She said that Kim (Eschelon) said that Eschelon would review internally. Eschelon does not agree that this change should be made. Bonnie said that Eschelon feels that limiting CFA changes to one per circuit on the due date is a change in process because Qwest has been providing multiple CFA changes for over 4 years. Bonnie said that, if you look at the CR submitted in 2002 by Allegiance, there was an example of multiple CFA changes in one example and it is clear that the intent was not to limit this to one CFA change. Bonnie said Qwest is now saying that what you have been doing is not appropriate and was not the intent of the CR. Bonnie said that she was in CMP and there was never any discussion at CMP associated to the single CFA process. Bonnie said that leaving it up to the discretion of the tester is very concerning and not a good decision. She said that there isn't going to be parity because a tester may do it for one CLEC but not another. Bonnie said that this is a change in process and not just a clarification.)**

Mark Coyne-Qwest stated that during the October CMP Meeting there was good discussion in regard to this notification. Qwest had stated that the intent of the Level 2 notice was for clarification. He said that the possibility of a different type of notice was



also discussed but the CLECs agreed that the MCC was a better way to proceed and would provide more flexibility. Bonnie Johnson-Eschelon stated that a Level 3 would have allowed additional conversation on the matter.

**(Comments to minutes received from Eschelon - Bonnie Johnson-Eschelon stated that a Level 3 would at least have allowed additional conversation on the matter.)**

Vicki Dryden-Qwest stated that originally the SME team discussed submitting the notice as a Level 2 but did submit a Level 3 notice instead due to the fact that CLECs would likely see this as a change in process. She said that Eschelon requested a retraction stating that this process was “limiting availability” and requested a Level 4.

Bonnie Johnson-Eschelon stated that Eschelon is requesting a Level 4 because this is limiting availability. Mark Coyne-Qwest asked if the other CLECs who agreed with the recommendation in the October Meeting had any input. Laurie Fredricksen-Integra stated that she agreed with Eschelon’s recommendation leaving it up to the tester’s discretion was not a good idea.

**(Comments to minutes received from Eschelon - Mark Coyne – Qwest stated that the notes from the Oct CMP indicated that Qwest was willing to follow the recommendation of the CLECs.)**

Mark Coyne-Qwest said Qwest will meet internally to determine next steps.

Mark Coyne-Qwest asked if there were any additional walk-on items for discussion. There were none brought forward.

The November Product Process CMP Meeting was concluded.

Resources

[Change Management Process \(CMP\)](#)

**Open Product/Process CR PC013007-3 Detail**

**Title:** [Verbal Supp for CFA Change on Due Date](#)

CR Number	Current Status Date	Area Impacted	Products Impacted
PC013007-3	Submitted 1/30/2007	Prov & Installation PCAT	Unbundled Loop

**Originator:** Ocken, Kathy  
**Originator Company Name:** Qwest Corporation  
**Owner:** Buckmaster, Cindy  
**Director:** Coyne, Mark  
**CR PM:** Stecklein, Lynn

**Description Of Change**

Process Change to the Provisioning and Installation Overview PCAT language for the existing PIA value of 10 to add the following: Prior to placing a service request, it is the CLEC responsibility to ensure the CFA is working. If it is determined on Due Date that CFA does not work, Qwest will perform additional testing with the CLEC one time. If the CLEC requests the CFA be changed, it is the responsibility of the CLEC to make sure the new CFA works. Qwest will accept only one verbal CFA change on the Due Date. If the new CFA fails to work, Qwest will place the order in jeopardy status (customer jeopardy). No further action will be taken on Qwest's part until Qwest receives a valid supplemental request to change the Due Date and the CFA (if applicable). Additional charges may apply.

**Status History**

Date	Action	Description
1/30/2007	CR Submitted	
1/30/2007	CR Acknowledged	

**Project Meetings**

[<Back](#)

Information Current as of 2/23/2007

**From:** Esquibel-Reed, Peggy [email redacted]

**Sent:** Friday, February 23, 2007 2:01 PM

**To:** Stichter, Kathleen L.; Isaacs, Kimberly D.; Laurie Fredricksen (Integra Telecom) [email redacted]; Leilani Hines (Verizon Business)[email redacted]; Jackie Diebold (E-mail); Sherry Krewett (McLeodUSA)[email redacted]; Sue Wright (XO)[email redacted]; Lee, Kathy T, GBLAM; AT&T email [email redacted]; Stearns, Julie; Prull, Stephanie A.; Johnson, Bonnie J.; Sonnier, Jeff J [NTK]; Bilow, Joyce E.; Emmy Brown (Time Warner Telecom)[email redacted]; Tim Kagele (Comcast)[email redacted]; Davis, Colette; Pamela Trickel (Tdsmetro)[email redacted]; Jamie Nelson; Terrell, Mary C (Chris), INFOT

**Cc:** Stecklein, Lynn; Lorence, Susan

**Subject:** ACTION REQUIRED February Prod/Proc & Systems Meeting Minutes for Review & Feedback

Good Afternoon,

I have attached the minutes from the February Product/Process and Systems CMP Meetings. Please review the documents to ensure that your comments were captured accurately. Please provide your proposed changes no later than 5:00 p.m. MT, Tuesday, February 27, 2007. Please track your changes.

Thank you,  
Peggy Esquibel-Reed  
Qwest Wholesale CMP

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.

**DRAFT Change Management Process (CMP) Monthly Meeting  
Product - Process  
Wednesday, February 21, 2007**

**Introductions and Announcements**

Mark Coyne-Qwest began the meeting with introductions.

**Prior Monthly Meeting Minutes (Attachment A)**

Mark Coyne-Qwest asked if there were any questions or comments on the Prior Monthly Meeting Minutes. There were no comments or questions brought forward.

**Review Global Action Items (Attachment B)**

There were no Global Action Items for the February Product Process Meeting.

**Review Active CLEC Originated Change Requests (Attachment C)**

**PC010907-1 Changes To Scheduled Customer Due Dates**

Tim Kagele-Comcast presented the CR and stated that the Industry Process is that when a CLEC schedules a port, the interval is 4-days and noted that Comcast has issues when the customer cannot be home at the time of the appointment. Tim stated that Qwests current process is to leave the number in the switch up to 48-hours. Tim stated that Comcast would like the process revised for a next day assurance on a supp. Tim noted that he Comcast wants an FOC on a 1-day due date change, instead of waiting for the standard 4-day norm. Tim noted that a discussion with the CLECs has occurred.

Mark Coyne-Qwest asked if there were any questions regarding this request. There were none brought forward.

Mark Coyne-Qwest stated that Qwest will review and evaluate the request and would provide the response in March.

**Review Active Qwest Initiated Change Requests (Attachment D)**

**PC010307-1 Elimination of Future Delivery and Extended Prompts functions on Qwest Voice Messaging Platform**

Mark Coyne-Qwest stated that the targeted implementation date for this request is 4/10/07.

**PC013007-1 Grandparent CENTRAFLEX 2 in Oregon**

Peggy Esquibel Reed-Qwest stated that Qwest is grandparenting Centraflex System 2 in Oregon and noted that there are no customers utilizing this product. Peggy then noted that due to no customers, Qwest would like to implement this request with a Level 2 notice. Peggy then asked if there were any questions regarding this CR or if there were any objections to implementation via a Level 2 notice. There were no questions or objections brought forward.

This CR moves to Presented Status.

**PC013007-2 Automatic Call Distribution – Electronic Switching System Tariff Elimination**

Peggy Esquibel Reed-Qwest stated that Qwest is grandparenting Automatic Call Distribution-Electronic Switching System Tariff Elimination and noted that there are no customers utilizing this product. Peggy stated that Qwest would also like to implement this CR with a Level 2 notification and asked if there were any questions or objections to the Level 2.

### **Qwest Wholesale Change Management Process (CMP) Meeting Minutes**

Bonnie Johnson-Eschelon stated that she had no objection to the Level 2 requests and noted that Eschelon may submit comments.

This CR moves to Presented Status.

### **PC013007-3 Verbal Supp for CFA Change on Due Date**

Lynn Stecklein-Qwest stated in October of 2006, Qwest proposed language to the Provisioning and Installation Overview which was intended to remind CLECs to check their CFAs before assigning them and to clarify that only one verbal supplement for CFA slot change was to be accepted on the Due Date. She said that in discussion with the CLEC community at the October Monthly CMP Meeting, this language was not adopted. She said that instead it was agreed that a MCC would be distributed internally and externally to reiterate the current process. Lynn stated that Eschelon requested that Qwest retract the MCC because this was a change in process and that a Level 4 should be submitted. Lynn reviewed the description of change:

This CR is a process change to the Provisioning and Installation Overview PCAT language for the existing PIA value of 10 to add the following: Prior to placing a service request, it is the CLEC responsibility to ensure the CFA is working. If it is determined on the Due Date that the CFA does not work, Qwest will perform additional testing with the CLEC one time. If the CLEC requests the CFA be changed, it is the responsibility of the CLEC to make sure the new CFA works. Qwest will accept only one verbal CFA change on the Due Date. If the new CFA fails to work, Qwest will place the order in a customer jeopardy status. No further action will be taken on Qwest's part until Qwest receives a valid supplemental request to change the Due Date and the CFA (If applicable).

Bonnie Johnson-Eschelon asked for further definition around Qwest performing additional testing one time. She said that specifically her question is that the additional testing issue has been brought forward multiple times before. She said that in this instance it is not the CFA, but the problem is on the Qwest side. She asked if the additional testing means that it would not be a Qwest issue.

Lynn Stecklein-Qwest stated that she will contact the SME and provide the response to Bonnie and also include in the minutes.

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

Mark Coyne-Qwest stated that at the end of the last ad hoc call it was mentioned that Qwest would schedule additional calls in order to continue the discussions on this CR to categorize products on the TRRO Product matrix and try to move forward with a prioritization of products. The original Qwest plan to gain CLEC input on the priority of the various products has not been as successful as we planned or hoped. We heard all the comments on that call and considered all the feedback that another call would just be rehashing the same things again. We then took all that feedback and gave it some additional thought in order to determine what the most logical next step would be, to allow Qwest and the CLEC community to continue to move forward on this issue. What makes sense at this point, to Qwest, is that we issue individual CMP CRs for the products that need to be addressed in CMP and hold discussions for specific CRs or product groupings. That would allow those CLECs with impact on those specific products to have a CMP forum for input on the process related changes associated with these products. It should provide a more meaningful and valuable method for proceeding with this effort for Qwest and for those CLECs who are impacted by these changes. Some, if not all, of those CRs will be submitted for the March 21st CMP Meeting.

Bonnie Johnson-Eschelon stated that on the last call, Cindy Buckmaster (Qwest) committed to taking one of her products, due to Integra's concerns regarding the PCATs, and to re-do the PCAT and meet on those changes. Bonnie asked if Qwest is now not going to do that.

Mark Coyne-Qwest stated that we internally evaluated what would work best and determined that the next step should be to issue the CRs.

Bonnie Johnson-Eschelon stated that she had no comment at this time.

**Qwest Wholesale Change Management Process (CMP) Meeting Minutes  
PC121106-1 Grandfathering ADSL Compatible UBL**

Peggy Esquibel Reed-Qwest stated that the Level 4 re-notice had been sent on February 5<sup>th</sup> and that 2 comments had been received. Peggy noted that the Qwest Response to Comments would be available on March 2<sup>nd</sup> and that the proposed effective date is March 19<sup>th</sup>.

There were no questions or comments brought forward.

This CR is in Development Status.

**Discussion of CMP Operations and Proposed Modifications to CMP Framework**

**PC110906-1CM CMP Document Update – Remove WSD Tier 0 References**

Peggy Esquibel Reed-Qwest stated that this CR, requesting a CMP Document Update to Remove Tier 0 References, was presented in the November CMP Meeting and asked for changes to the CMP Document, to remove Wholesale Service Delivery (WSD) Tier 0 references, to synch-up with changes implemented via a process change early last year. Peggy stated that we also wanted to clarify some language surrounding call center DB tickets. A vote was conducted in December and a no vote was submitted due to concerns regarding proposed language for the call center database tickets. We then revised the language to remove the clarification to the “ticket” references and the revised proposed language is now to only remove Tier 0 from the CMP Document. Peggy asked if there were any questions. None were brought forward. Peggy then stated that the quorum for today’s vote is 5 and noted that that it had been achieved. Peggy then stated that a vote of ‘Yes’ would indicate a preference that updates be made to the CMP Document to remove Wholesale Service Delivery Tier 0 references to synch up with changes implemented via a process change in the 2<sup>nd</sup> quarter of 2006. A vote of ‘No’ would indicate a preference that updates not be made to the CMP Document to remove WSD Tier 0 references to synch up with changes implemented last year. Peggy then noted that unanimous agreement is required in order for the change to occur. Peggy asked if there were any questions regarding the vote. There were no questions. Peggy then stated that 5 emailed Yes votes had been received from Sprint Nextel, Covad, Qwest Corp., Eschelon, and Verizon Business. Peggy then asked if any other CLEC would like to submit a vote.

Integra voted Yes

XO voted Yes

McLeod voted Yes

Peggy Esquibel Reed-Qwest stated that this requested change has been granted by a vote of 8 Yes votes, 0 No votes, and 0 Abstain votes. Peggy then noted that the vote disposition would be sent and thanked the participants for their votes.

Peggy Esquibel Reed-Qwest then asked the call participants if there were any objections to this change being implemented with a Level 1 Notice. There were no objections to the Level 1 Notice request.

**PC110806-1CM CMP Document Update – Provide Meeting minutes associated with Special Ad Hoc meetings in conjunction with Section 5**

Mark Coyne-Qwest stated that we are currently reviewing on last iteration of the language and will send out for review. He said that we would try and conduct the vote in the March CMP Meeting.

**General CMP Comments:**

None.

**Walk On Items**

Mark Coyne-Qwest asked if there were any walk on items for the Product Process CMP Meeting. There were none brought forward.

The February Product Process CMP Meeting was concluded.

# **DRAFT Meeting Minutes**

**CMP Monthly Systems Meeting  
Wednesday, February 21, 2007  
Bridge Call open to all CLECs**

## **INTRODUCTIONS AND ANNOUNCEMENTS**

Mark Coyne-Qwest began the meeting by asking if there were any additional participants that had joined the call.

### **PRIOR MONTHLY MEETING MINUTES (ATTACHMENT A)**

Mark Coyne-Qwest asked if there were any questions or comments on the Prior Monthly Meeting Minutes. There were no comments or questions brought forward.

### **NEW CRs INITIATED BY CLECs (ATTACHMENT B)**

There were no New CLEC Change Requests for the February Systems CMP Meeting

### **NEW CRs INITIATED BY QWEST (ATTACHMENT C)**

#### **SCR012407-01 Add new PIA Value - Verbal SUP To Add Cooperative Test On DD**

Denise Martinez-Qwest presented the CR and stated that a new PIA (Provider Initiated Activity) on FOCs would allow Qwest Network to accept a verbal SUP on the due date to change the installation/testing type from what was originally requested on Unbundled Loop and Loop with Number Portability LSRs. Denise noted that as with other PIA values, this would allow for immediate identification of the PIA by value entry and reduce lengthy remarks that would have to be read manually. Denise asked if there were any questions.

Bonnie Johnson-Eschelon stated that Steph (Prull-Eschelon) was not on the call and stated that if Steph had questions, she would send them or they could be discussed at the March CMP Meeting.

Denise Martinez-Qwest stated that everyone should benefit from this change and noted that all should be happy with it. Without this value, the new process cannot be implemented. Currently, a SUP is required including a due date change of 3 day or more interval.

Bonnie Johnson-Eschelon stated that it does appear that would be the case and that she would get with Steph.

Denise Martinez-Qwest stated that she looked forward to any questions that Steph may have.

There were no additional questions or comments.

This CR moves to Presented Status.

## **REGULATORY AND INDUSTRY GUIDELINE CHANGE REQUESTS (ATTACHMENT D)**

#### **SCR020207-01IG CABS BOS Version 47**

Peggy Esquibel Reed-Qwest stated that this CR is for the standard upgrade for bill and CSR output in IABS and noted that it is targeted for the November timeframe.

There were no questions or comments.

This CR moves to Presented Status.

## **CROSS OVER CRs (ATTACHMENT E)**

There were no Cross Over CRs for the February Systems CMP Meeting

## **WALK ON CHANGE REQUESTS (ATTACHMENT F)**

There were no Walk On Change Requests for the February Systems CMP Meeting

## **CRs TO CONSIDER FOR CLOSURE (ATTACHMENT G)**

### **SCR121305-01 Implement XML Interface for IMA EDI**

Mark Coyne-Qwest stated that this CR would remain in CLEC Test until the 1<sup>st</sup> CLEC goes into production.

Bonnie Johnson-Eschelon stated they are getting close.

Mark Coyne-Qwest stated that maybe we can close this action item next month.

## **REVIEW GLOBAL ACTION ITEMS (ATTACHMENT H)**

There are no Global Action Items for the February Systems CMP Meeting

## **REVIEW ACTION ITEMS ASSOCIATED WITH CRs (ATTACHMENT I)**

### **SCR010307-01 Provide Targeted Implementation Date of 4/1/07 on SCR010307-01 CEMR Voice Messaging Trouble Shooting Flows Update**

Mark Coyne-Qwest stated that the targeted implementation for this change is 4/01/07. He said that this CR is related to the Product Process CR mentioned earlier. Mark said that the Product Process CR is going in after this CR (4/10/07) so that additional testing can be done.

### **SCR082806-02 Provide Targeted Implementation Date of 4/1/07 on SCR082806-02 User Activity Report for CEMR**

Mark Coyne-Qwest stated that the implementation date of this Verizon Business CR is 4/01/07.

### **SCR122806-01 Provide Evaluation for SCR122606-01 Chng EUMI Field & EU Addrss Rqrmnts for Port Within Ordg Proc #1 to avoid LSR Submission Errors & Rejects in Error**

Venessa Heiland-Qwest stated that this CR is accepted and would be implemented.

Kim Isaacs-Eschelon stated that she was very happy to hear that.

Peggy Esquibel Reed-Qwest asked if this was being implemented as a Process change and not as a Systems change, and if the new address would be required on the EU Form.

Venessa Heiland-Qwest stated that the change would be done via an update to the PCAT. Venessa stated that the new address on the EU Form would be an option and not required.

Kim Isaacs-Eschelon stated that there could then be multiple processes and could be confusing.



Venessa Heiland-Qwest stated that the process would be to allow an EUMI of Y and to keep the current process of the new address being in Remarks. Venessa stated that the new address on the EU Form may be a later request.

Kim Isaacs-Eschelon stated that we would be half way there with the EUMI of Y and noted that the new address in Remarks would get errors. Kim asked if it was possible to do both pieces at once.

Venessa Heiland-Qwest asked if all CLECs would agree to that.

Bonnie Johnson-Eschelon stated that this change could be opposite of the process for a port within. Bonnie asked that all port processes be looked at for consistency.

Kim Isaacs-Eschelon noted that that would be the best way to go.

Bonnie Johnson-Eschelon asked if Qwest would consider their suggestion.

Mark Coyne-Qwest stated that we would look at it internally.

### **OUTSTANDING SYSTEMS CMP CHANGE REQUESTS (ATTACHMENT J)**

Mark Coyne-Qwest asked if there were any questions or comments on any of the open CRs. There were no questions or comments brought forward.

### **REVIEW DEPLOYING CHANGE REQUESTS (ATTACHMENT K)**

#### **SCR112806-01IG ASOG 34 Industry Release/QORA and ASR Gateway Enhancements**

Mark Coyne-Qwest stated that this CR will deploy on 3/12/07.

### **PRODUCTION SUPPORT TICKETS (ATTACHMENT L)**

Mark Coyne-Qwest stated that there are currently 12 tickets on the TBD report and noted that there were no updates for the tickets.

### **IMA AND SATE 21.0 COMMITMENTS (ATTACHMENT M)**

Mark Coyne-Qwest stated that this attachment contained the 5 candidates that are committed to the IMA & SATE 21.0 Release. Mark asked if there were any questions. There were none.

### **WALK ON ITEMS (ATTACHMENT N)**

Mark Coyne-Qwest stated that the March CMP Meeting is scheduled for Wednesday, March 21, 2007 at 9:00 a.m., via conference call, and that the CR cutoff date is March 7, 2007.

Mark Coyne-Qwest stated that the CR review for each companies top 2 pick, for the IMA 22.0 Prioritization, would also occur in the March CMP Meeting, with Prioritization to follow.

The February CMP Meeting adjourned at 9:40 a.m. MT.

**From:** Johnson, Bonnie J. [email redacted]

**Sent:** Friday, February 23, 2007 3:46 PM

**To:** Esquibel-Reed, Peggy; Stichter, Kathleen L.; Isaacs, Kimberly D.; Laurie Fredricksen (Integra Telecom)[email redacted]; Leilani Hines (Verizon Business)[email redacted]; Jackie Diebold (E-mail); Sherry Krewett (McLeodUSA)[email redacted]; Sue Wright (XO)[email redacted]; Lee, Kathy T, GBLAM; AT&T email [redacted]; Stearns, Julie; Prull, Stephanie A.; Sonnier, Jeff J [NTK]; Bilow, Joyce E.; Emmy Brown (Time Warner Telecom)[email redacted]; Tim Kagele (Comcast)[email redacted]; Davis, Colette; Pamela Trickel (TDS Metro)[email redacted]; Jamie Nelson; Terrell, Mary C (Chris), INFOT; Johnson, Bonnie J.

**Cc:** Stecklein, Lynn; Lorence, Susan

**Subject:** RE: ACTION REQUIRED February Prod/Proc & Systems Meeting Minutes for Review & Feedback

Here are my red line comments.

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

**DRAFT Change Management Process (CMP) Monthly Meeting  
Product - Process  
Wednesday, February 21, 2007**

**Introductions and Announcements**

Mark Coyne-Qwest began the meeting with introductions.

**Prior Monthly Meeting Minutes (Attachment A)**

Mark Coyne-Qwest asked if there were any questions or comments on the Prior Monthly Meeting Minutes. There were no comments or questions brought forward.

**Review Global Action Items (Attachment B)**

There were no Global Action Items for the February Product Process Meeting.

**Review Active CLEC Originated Change Requests (Attachment C)**

**PC010907-1 Changes To Scheduled Customer Due Dates**

Tim Kagele-Comcast presented the CR and stated that the Industry Process is that when a CLEC schedules a port, the interval is 4-days and noted that Comcast has issues when the customer cannot be home at the time of the appointment. Tim stated that Qwests current process is to leave the number in the switch up to 48-hours. Tim stated that Comcast would like the process revised for a next day assurance on a supp. Tim noted that he Comcast wants an FOC on a 1-day due date change, instead of waiting for the standard 4-day norm. Tim noted that a discussion with the CLECs has occurred.

Mark Coyne-Qwest asked if there were any questions regarding this request. There were none brought forward.

Mark Coyne-Qwest stated that Qwest will review and evaluate the request and would provide the response in March.

**Review Active Qwest Initiated Change Requests (Attachment D)**

**PC010307-1 Elimination of Future Delivery and Extended Prompts functions on Qwest Voice Messaging Platform**

Mark Coyne-Qwest stated that the targeted implementation date for this request is 4/10/07.

Bonnie Johnson-Eschelon stated that she had no objection to the Level 2 requests on all of the grandparenting CRs but noted that Eschelon may submit comments.

**PC013007-1 Grandparent CENTRAFLEX 2 in Oregon**

Peggy Esquibel Reed-Qwest stated that Qwest is grandparenting Centraflex System 2 in Oregon and noted that there are no customers utilizing this product. Peggy then noted that due to no customers, Qwest would like to implement this request with a Level 2 notice. Peggy then asked if there were any questions regarding this CR or if there were any objections to implementation via a Level 2 notice. There were no questions or objections brought forward.

This CR moves to Presented Status.

Bonnie Johnson-Eschelon stated that she had no objection to the Level 2 requests on all of the grandparenting CRs but noted that Eschelon may submit comments.

**Qwest Wholesale Change Management Process (CMP) Meeting Minutes  
PC013007-2 Automatic Call Distribution – Electronic Switching System Tariff Elimination**

Peggy Esquibel Reed-Qwest stated that Qwest is grandparenting Automatic Call Distribution-Electronic Switching System Tariff Elimination and noted that there are no customers utilizing this product. Peggy stated that Qwest would also like to implement this CR with a Level 2 notification and asked if there were any questions or objections to the Level 2.

Bonnie Johnson-Eschelon stated that she had no objection to the Level 2 requests on all of the grandparenting request but and noted that Eschelon may submit comments.

This CR moves to Presented Status.

**PC013007-3 Verbal Supp for CFA Change on Due Date**

Lynn Stecklein-Qwest stated in October of 2006, Qwest proposed language to the Provisioning and Installation Overview which was intended to remind CLECs to check their CFAs before assigning them and to clarify that only one verbal supplement for CFA slot change was to be accepted on the Due Date. She said that in discussion with the CLEC community at the October Monthly CMP Meeting, this language was not adopted. She said that instead it was agreed that a MCC would be distributed internally and externally to reiterate the current process. Lynn stated that Eschelon requested that Qwest retract the MCC because this was a change in process and that a Level 4 should be submitted. Lynn reviewed the description of change:

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Bonnie Johnson-Eschelon asked for further definition around Qwest performing additional testing one time. She said that specifically her question is that the additional testing issue has been brought forward multiple times before. She said that in this-those instances it is not the CFA, but the problem is on the Qwest side. She asked if the additional testing means that it would not be a Qwest issue.

Lynn Stecklein-Qwest stated that she will contact the SME and provide the response to Bonnie and also include in the minutes.

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

Mark Coyne-Qwest stated that at the end of the last ad hoc call it was mentioned that Qwest would schedule additional calls in order to continue the discussions on this CR to categorize products on the TRRO Product matrix and try to move forward with a prioritization of products. The original Qwest plan to gain CLEC input on the priority of the various products has not been as successful as we planned or hoped. We heard all the comments on that call and considered all the feedback that another call would just be rehashing the same things again. We then took all that feedback and gave it some additional thought in order to determine what the most logical next step would be, to allow Qwest and the CLEC community to continue to move forward on this issue. What makes sense at this point, to Qwest, is that we issue individual CMP CRs for the products that need to be addressed in CMP and hold discussions for specific CRs or product groupings. That would allow those CLECs with impact on those specific products to have a CMP forum for input on the process related changes associated with these products. It should provide a more meaningful and valuable method for proceeding with this effort for Qwest and for those CLECs who are impacted by these changes. Some, if not all, of those CRs will be submitted for the March 21st CMP Meeting.

Bonnie Johnson-Eschelon stated that on the last call, Cindy Buckmaster (Qwest) committed to taking one of her products, due to Integra's concerns regarding Qwest cut an pasting information from the ICA into the PCATs, and to re-do the PCAT and meet on those changes. Bonnie asked if Qwest is now not going to do that follow through with that committment.

### **Qwest Wholesale Change Management Process (CMP) Meeting Minutes**

Mark Coyne-Qwest stated that we internally evaluated what would work best and determined that the next step should be to issue the CRs.

Bonnie Johnson-Eschelon stated that she had no comment at this time.

### **PC121106-1 Grandfathering ADSL Compatible UBL**

Peggy Esquibel Reed-Qwest stated that the Level 4 re-notice had been sent on February 5<sup>th</sup> and that 2 comments had been received. Peggy noted that the Qwest Response to Comments would be available on March 2<sup>nd</sup> and that the proposed effective date is March 19<sup>th</sup>.

There were no questions or comments brought forward.

This CR is in Development Status.

## **Discussion of CMP Operations and Proposed Modifications to CMP Framework**

### **PC110906-1CM CMP Document Update – Remove WSD Tier 0 References**

Peggy Esquibel Reed-Qwest stated that this CR, requesting a CMP Document Update to Remove Tier 0 References, was presented in the November CMP Meeting and asked for changes to the CMP Document, to remove Wholesale Service Delivery (WSD) Tier 0 references, to synch-up with changes implemented via a process change early last year. Peggy stated that we also wanted to clarify some language surrounding call center DB tickets. A vote was conducted in December and a no vote was submitted due to concerns regarding proposed language for the call center database tickets. We then revised the language to remove the clarification to the “ticket” references and the revised proposed language is now to only remove Tier 0 from the CMP Document. Peggy asked if there were any questions. None were brought forward. Peggy then stated that the quorum for today’s vote is 5 and noted that that it had been achieved. Peggy then stated that a vote of ‘Yes’ would indicate a preference that updates be made to the CMP Document to remove Wholesale Service Delivery Tier 0 references to synch up with changes implemented via a process change in the 2<sup>nd</sup> quarter of 2006. A vote of ‘No’ would indicate a preference that updates not be made to the CMP Document to remove WSD Tier 0 references to synch up with changes implemented last year. Peggy then noted that unanimous agreement is required in order for the change to occur. Peggy asked if there were any questions regarding the vote. There were no questions. Peggy then stated that 5 emailed Yes votes had been received from Sprint Nextel, Covad, Qwest Corp., Eschelon, and Verizon Business. Peggy then asked if any other CLEC would like to submit a vote.

Integra voted Yes

XO voted Yes

McLeod voted Yes

Peggy Esquibel Reed-Qwest stated that this requested change has been granted by a vote of 8 Yes votes, 0 No votes, and 0 Abstain votes. Peggy then noted that the vote disposition would be sent and thanked the participants for their votes.

Peggy Esquibel Reed-Qwest then asked the call participants if there were any objections to this change being implemented with a Level 1 Notice. There were no objections to the Level 1 Notice request.

### **PC110806-1CM CMP Document Update – Provide Meeting minutes associated with Special Ad Hoc meetings in conjunction with Section 5**

Mark Coyne-Qwest stated that we are currently reviewing on last iteration of the language and will send out for review. He said that we would try and conduct the vote in the March CMP Meeting.

### **General CMP Comments:**

None.

## **Qwest Wholesale Change Management Process (CMP) Meeting Minutes**

### **Walk On Items**

Mark Coyne-Qwest asked if there were any walk on items for the Product Process CMP Meeting. There were none brought forward.

The February Product Process CMP Meeting was concluded.

# **DRAFT Meeting Minutes**

**CMP Monthly Systems Meeting  
Wednesday, February 21, 2007  
Bridge Call open to all CLECs**

## **INTRODUCTIONS AND ANNOUNCEMENTS**

Mark Coyne-Qwest began the meeting by asking if there were any additional participants that had joined the call.

### **PRIOR MONTHLY MEETING MINUTES (ATTACHMENT A)**

Mark Coyne-Qwest asked if there were any questions or comments on the Prior Monthly Meeting Minutes. There were no comments or questions brought forward.

### **NEW CRs INITIATED BY CLECs (ATTACHMENT B)**

There were no New CLEC Change Requests for the February Systems CMP Meeting

### **NEW CRs INITIATED BY QWEST (ATTACHMENT C)**

#### **SCR012407-01 Add new PIA Value - Verbal SUP To Add Cooperative Test On DD**

Denise Martinez-Qwest presented the CR and stated that a new PIA (Provider Initiated Activity) on FOCs would allow Qwest Network to accept a verbal SUP on the due date to change the installation/testing type from what was originally requested on Unbundled Loop and Loop with Number Portability LSRs. Denise noted that as with other PIA values, this would allow for immediate identification of the PIA by value entry and reduce lengthy remarks that would have to be read manually. Denise asked if there were any questions.

Bonnie Johnson-Eschelon stated that Steph (Prull-Eschelon) was not on the call and stated that if Steph had questions, she would send them or they could be discussed at the March CMP Meeting.

Denise Martinez-Qwest stated that everyone should benefit from this change and noted that all should be happy with it. Without this value, the new process cannot be implemented. Currently, a SUP is required including a due date change of 3 day or more interval.

Bonnie Johnson-Eschelon stated that it does appear on the surface at least, that would be the case and that she would get with Steph.

Denise Martinez-Qwest stated that she looked forward to any questions that Steph may have.

There were no additional questions or comments.

This CR moves to Presented Status.

## **REGULATORY AND INDUSTRY GUIDELINE CHANGE REQUESTS (ATTACHMENT D)**

#### **SCR020207-01IG CABS BOS Version 47**

Peggy Esquibel Reed-Qwest stated that this CR is for the standard upgrade for bill and CSR output in IABS and noted that it is targeted for the November timeframe.

There were no questions or comments.

This CR moves to Presented Status.

## **CROSS OVER CRs (ATTACHMENT E)**

There were no Cross Over CRs for the February Systems CMP Meeting

## **WALK ON CHANGE REQUESTS (ATTACHMENT F)**

There were no Walk On Change Requests for the February Systems CMP Meeting

## **CRs TO CONSIDER FOR CLOSURE (ATTACHMENT G)**

### **SCR121305-01 Implement XML Interface for IMA EDI**

Mark Coyne-Qwest stated that this CR would remain in CLEC Test until the 1<sup>st</sup> CLEC goes into production.

Bonnie Johnson-Eschelon stated they are getting close.

Mark Coyne-Qwest stated that maybe we can close this action item next month.

## **REVIEW GLOBAL ACTION ITEMS (ATTACHMENT H)**

There are no Global Action Items for the February Systems CMP Meeting

## **REVIEW ACTION ITEMS ASSOCIATED WITH CRs (ATTACHMENT I)**

### **SCR010307-01 Provide Targeted Implementation Date of 4/1/07 on SCR010307-01 CEMR Voice Messaging Trouble Shooting Flows Update**

Mark Coyne-Qwest stated that the targeted implementation for this change is 4/01/07. He said that this CR is related to the Product Process CR mentioned earlier. Mark said that the Product Process CR is going in after this CR (4/10/07) so that additional testing can be done.

### **SCR082806-02 Provide Targeted Implementation Date of 4/1/07 on SCR082806-02 User Activity Report for CEMR**

Mark Coyne-Qwest stated that the implementation date of this Verizon Business CR is 4/01/07.

### **SCR122806-01 Provide Evaluation for SCR122606-01 Chng EUMI Field & EU Addrss Rqrmnts for Port Within Ordg Proc #1 to avoid LSR Submission Errors & Rejects in Error**

Venessa Heiland-Qwest stated that this CR is accepted and would be implemented.

Kim Isaacs-Eschelon stated that she was very happy to hear that.

Peggy Esquibel Reed-Qwest asked if this was being implemented as a Process change and not as a Systems change, and if the new address would be required on the EU Form.

Venessa Heiland-Qwest stated that the change would be done via an update to the PCAT. Venessa stated that the new address on the EU Form instead of the remarks field would be an option and not required.

Kim Isaacs-Eschelon stated that there could then be multiple processes and could be confusing.



Venessa Heiland-Qwest stated that the process would be to allow an EUMI of Y and to keep the current process of the new address being in Remarks. Venessa stated that the new address on the EU Form may be a later request.

Kim Isaacs-Eschelon stated that we would be half way there with the EUMI of Y and noted that the new address in Remarks would get errors. Kim asked if it was possible to do both pieces at once.

Venessa Heiland-Qwest asked if all CLECs would agree to that.

Bonnie Johnson-Eschelon stated that this change could be opposite of the process for a port within. Bonnie asked that all port processes be looked at for consistency.

Kim Isaacs-Eschelon noted that that would be the best way to go.

Bonnie Johnson-Eschelon asked if Qwest would consider their suggestion.

[Vanessa Heiland – Qwest said yes.](#)

Mark Coyne-Qwest stated that we would look at it internally.

## **OUTSTANDING SYSTEMS CMP CHANGE REQUESTS (ATTACHMENT J)**

Mark Coyne-Qwest asked if there were any questions or comments on any of the open CRs. There were no questions or comments brought forward.

## **REVIEW DEPLOYING CHANGE REQUESTS (ATTACHMENT K)**

### **SCR112806-01IG ASOG 34 Industry Release/QORA and ASR Gateway Enhancements**

Mark Coyne-Qwest stated that this CR will deploy on 3/12/07.

## **PRODUCTION SUPPORT TICKETS (ATTACHMENT L)**

Mark Coyne-Qwest stated that there are currently 12 tickets on the TBD report and noted that there were no updates for the tickets.

## **IMA AND SATE 21.0 COMMITMENTS (ATTACHMENT M)**

Mark Coyne-Qwest stated that this attachment contained the 5 candidates that are committed to the IMA & SATE 21.0 Release. Mark asked if there were any questions. There were none.

## **WALK ON ITEMS (ATTACHMENT N)**

Mark Coyne-Qwest stated that the March CMP Meeting is scheduled for Wednesday, March 21, 2007 at 9:00 a.m., via conference call, and that the CR cutoff date is March 7, 2007.

Mark Coyne-Qwest stated that the CR review for each companies top 2 pick, for the IMA 22.0 Prioritization, would also occur in the March CMP Meeting, with Prioritization to follow.

The February CMP Meeting adjourned at 9:40 a.m. MT.

**From:** Johnson, Bonnie J. [email redacted]  
**Sent:** Friday, February 23, 2007 4:25 PM  
**To:** Stecklein, Lynn  
**Cc:** New Cr, Cmp; Johnson, Bonnie J.  
**Subject:** RE: PC013007-3 Verbal Supp for CFA Change on the Due Date

Lynn,  
Eschelon disagrees. As I have said before, Eschelon should not have to pay additional installation costs so Qwest can find and fix their problems.

Please also include my response.

Thanks,

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

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**From:** Stecklein, Lynn [email redacted]  
**Sent:** Friday, February 23, 2007 4:09 PM  
**To:** Johnson, Bonnie J.  
**Cc:** New Cr, Cmp  
**Subject:** PC013007-3 Verbal Supp for CFA Change on the Due Date

Hi Bonnie,

This is in response to your question on PC013007-3 -Verbal Supp for CFA Change on the Due Date (DD). The purpose of this CR is to identify that Qwest will not accept more than one verbal CFA change on the DD. Additional testing is always available to a CLEC as long as it is in their contract. Additional Testing will be available on an install if it is in their contract. That testing will occur each and every time it is requested. If it is determined during testing that the problem is on the Qwest side, additional testing would not apply.

I will include also include this response in the February Product/Process meeting minutes prior to posting.

Thanks,

Lynn Stecklein  
Qwest Wholesale CMP

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**February CMP Monthly Meeting Minutes on PC0103007-3 Verbal Supp for CFA Change on Due Date**

Lynn Stecklein-Qwest stated in October of 2006, Qwest proposed language to the Provisioning and Installation Overview which was intended to remind CLECs to check their CFAs before assigning them and to clarify that only one verbal supplement for CFA slot change was to be accepted on the Due Date. She said that in discussion with the CLEC community at the October Monthly CMP Meeting, this language was not adopted. She said that instead it was agreed that a MCC would be distributed internally and externally to reiterate the current process. Lynn stated

that Eschelon requested that Qwest retract the MCC because this was a change in process and that a Level 4 should be submitted. Lynn reviewed the description of change:

This CR is a process change to the Provisioning and Installation Overview PCAT language for the existing PIA value of 10 to add the following: Prior to placing a service request, it is the CLEC responsibility to ensure the CFA is working. If it is determined on the Due Date that the CFA does not work, Qwest will perform additional testing with the CLEC one time. If the CLEC requests the CFA be changed, it is the responsibility of the CLEC to make sure the new CFA works. Qwest will accept only one verbal CFA change on the Due Date. If the new CFA fails to work, Qwest will place the order in a customer jeopardy status. No further action will be taken on Qwest's part until Qwest receives a valid supplemental request to change the Due Date and the CFA (If applicable).

Bonnie Johnson-Eschelon asked for further definition around Qwest performing additional testing one time. She said that specifically her question is that the additional testing issue has been brought forward multiple times before. She said that in those instances it is not the CFA, but the problem is on the Qwest side. She asked if the additional testing means that it would not be a Qwest issue.

Lynn Stecklein-Qwest stated that she will contact the SME and provide the response to Bonnie and also include in the minutes.

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