EXHIBIT 1

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of TEL WEST COMMUNICATIONS, LLC'S PETITION FOR ENFORCEMENT OF ITS INTERCONNECTION AGREEMENT WITH QWEST CORPORATION	Docket No. UT-053098 PETITION FOR ENFORCEMENT OF THE INTERCONNECTION AGREEMENT

DECLARATION OF

DENNIS PAPPAS

1 My name is Dennis Pappas. I am employed by Qwest Corporation as a Director in the Public Policy organization representing Local Network Operations. My business address is 700 W. Mineral Avenue, Room MNH19.15, Littleton, Colorado 80120. I have worked in the telecommunications industry for 27 years. In December 2001, I accepted my current position as Director in Qwest's Public Policy group. Following the issuance of the *Triennial Review Order*, I led a team developing a "batch hot cut" process, which would allow CLECs to undertake large quantities of UNE-P to UNE-Loop conversions at a reduced price and without lengthy service interruptions for end user customers.

2 Prior to the years worked in Wholesale Markets, I held multiple titles and positions requiring expertise in network operations, including Staff Manager and Regional Service Manager in the Local Networks Organization. In the 14 years prior to those assignments, I worked in Network as an Installation and Maintenance Technician (I&M Technician) and an Outside Plant Technician. I have my Bachelor's degree in Business Administration and a Masters in Telecommunications from the University of Denver.

3 This declaration will describe the region-wide batch hot cut process ("BHCP") that Qwest developed in the first quarter 2004 in conjunction with a number of CLECs during a regional CLEC Forum in December 2003 and January 2004. Attachment A to this Declaration provides an overview in the form of a timeline describing major milestones and approximate dates in which these events occurred. The BHCP allows CLECs to migrate large quantities of CLEC UNE-P lines to stand-alone unbundled loops within reasonable timeframes and at a high level of quality. The improvements yielded by the BHCP have made it more economic for CLECs to serve mass-market customers in various markets without access to unbundled ILEC switching.

4 Even though the D.C. Circuit, in *USTA II*, vacated the batch hot cut requirements in the

Triennial Review Order, Qwest voluntarily implemented the BHCP which was jointly developed with members of the CLEC community with process testing taking place in early 2004 and development and implementation of the associated batch hot cut ("BHC") tools being introduced by mid-October 2004. All fourteen state commissions in Qwest's region agreed to participate in a consolidated forum to develop a region-wide batch hot cut process and to build the record for the states' individual *Triennial Review Order* dockets. These meetings resulted in the successful development of a robust BHCP that has been utilized to convert thousands of orders to date, and which was implemented and usable as of December 31, 2004.

5 I will first discuss the current BHCP and the timeframe in which this new process was introduced and implemented. In addition, I will discuss the number of BHCs that have been performed since its implementation and the dates of both the trial and "live" BHC orders. I will also provide descriptions of the Batch Status Tool and Scheduling Tool, along with timeframes of the tools' development and introduction.

6 The BHCP was developed through a series of meetings with a number of CLECs during December 2003 and January 2004. The final process was agreed upon near the end of March 2004 and Qwest began working with a CLEC to conduct a trial of the process to identify gaps within the process itself.

7 Upon its development and introduction to the CLEC community, the BHCP was included in the Unbundled Loop section of the Qwest Product Catalog ("PCAT") on August 2, 2004 as an additional installation option that permitted a single CLEC to order "batches" of 25 to 100 standalone unbundled analog loops, in the same Central Office, where loop facilities are being reused and no dispatch of a Qwest outside field technician is required. Version one (V.1) was then memorialized for the first time in the PCAT on or about August 10, 2004 and is included in this Declaration as Attachment B. The current version (V.4) can be found in the Qwest

PCAT at http://www.qwest.com/wholesale/clecs/batchhotcut.html. Attachment C is the history log for the PCAT entries for the BCHP to date.

8 The BHCP includes a Scheduling Tool which enables the CLEC to electronically select a due date and a Batch Status Tool that provides the CLECs with regularly scheduled status reports concerning their BHC orders. The BHCP is designed not only for the conversion of the embedded base of UNE-P customers, but also for the conversion and migration of newly acquired CLEC customers who have existing analog (voice) service (either Qwest retail or CLEC UNE-P or UNE-L) at present.

9 Under the BHCP, CLECs will submit LSRs as they would otherwise do, with an additional field indicating that the LSR is part of a batch hot cut. Detailed information about how the process works once an LSR has been submitted is included in Attachment D to this declaration.

10 The BHCP was implemented and operational as of December 31, 2004. During the first half of 2005, Qwest processed more than 8,100 orders utilizing the BHCP, converting more than 18,700 lines to UNE-Loops, including orders from Tel West in Washington. Year to date, Qwest has converted more than 48,000 lines using the BHCP. Attachment E is a summary of the lines converted by month and by state indicating not only the existence of the BHCP but the fact that the process and associated tools were in place and capable of transitioning commercial volumes for CLECs utilizing the process. In 2005, the first BHC orders were processed on January 5, 2005. Prior to that time, during early 2004, Qwest converted more than 500 lines as part of a test with a single CLEC in a number of offices in Washington, Idaho, Minnesota, and Iowa. The purpose of this trial was to test the "new" process for gaps in order to enhance the BHCP. During each phase of the test, slight modifications were made to the process but, for the most part, results were positive with no single end user experiencing down time for longer than approximately 15 seconds.

11 In addition to its current OSS tools, Qwest has implemented two additional tools in connection with the BHCP. In a joint effort with participants at the BHC Forum, the concept of additional mechanization was discussed and it was determined that these two new tools were needed in order to further enhance the BHCP. The first tool – the Batch Scheduling Tool – allows the CLEC to plan and schedule conversions on a central office by central office basis in an orderly fashion while the second tool – the Batch Status Tool – enables Qwest to notify the CLEC of order status and changes in an electronic format. The Status Tool is instrumental in notifying the CLEC of order completion, which then initiates a request for number porting by the CLEC. The successful release of both tools was part of IMA release 16.0 which was completed on October 18, 2004.

12 The CLEC community was notified of the introduction of these two new tools via the Change Management Process ("CMP"). Attachment F is a copy of the CMP training notification that was distributed to the CLEC community on September 20, 2004.

13 The CLEC must submit an LSR at least seven business days in advance of the time slot available in the scheduling tool. This interval is memorialized in the Service Interval Guide, which is Exhibit C to the state's approved SGAT, and which can be found at http://www.qwest.com/wholesale/guides/sig/index.html. Specific information on the intervals associated with the BHCP can be found on page 93 of the Service Interval Guide for Resale, UNE & Interconnection Services.

14 The BHCP is a regional process and does not differ from state to state. Thus, once it was implemented, it was available equally to all CLECs in all states, provided that the CLEC had a BHC amendment to their interconnection agreement. Without such an amendment, the USOC for ordering loops under the BHCP can not be built into the ordering system. Tel West did not have such an amendment until February 1, 2005.

15 Tel West placed BHC orders in Washington in late February 2004. Tel West first opened a trouble ticket regarding difficulty placing such orders on February 24, 2005. Under the established BHC process, CLECs were instructed to call the help desk to resolve any ordering issues. Information is available within the Ordering Overview PCAT (V102.0), located at http://www.qwest.com/wholesale/clecs/ordering.html, as well as the Wholesale Customer Contacts PCAT (V27.0), located at http://www.qwest.com/wholesale/clecs/escalations.html. If Tel West was encountering problems with their orders rejecting, these are the standard processes to follow.

16 The problems that Tel West encountered with placing BHC orders were related to non-matching CLLI code identifiers, and to the fact that the ordering USOCs were not yet loaded into the system when the orders were placed. Both problems were resolved quickly, and only eleven days after the problem was identified, on March 7, 2005, Qwest provided Tel West with information to allow Tel West to place its orders correctly. These problems do not mean that Qwest had not "implemented" the BHCP, as that process was in place and implemented in late 2004. The BHCP included a process for resolution of problems a CLEC might face – Tel West used the process successfully to place BHC orders on March 7, 2005 that were completed in a timely manner on March 16, 2005.

17 The introduction of the Qwest BHCP in early 2004 was tested thoroughly on a trial basis first and then later used for commercial volumes. The OSS modifications – both the Batch Scheduling and Batch Status tool – have refined the process further and have allowed those using the process since October 2004 to efficiently manage the migration of UNE-P and resale lines over to the UNE-L product. The BHC process was implemented in Washington, and Qwest's other 13 states, in December of 2004.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Signed and dated this 20th day of December, 2005, at Littleton, Colorado.

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Dennis Pappas
Director of Public Policy