QWEST COLORADO xDSL LOOP FOC TRIAL

Summary of Trial Proposal

Qwest hereby proposes that the parties to the Colorado 271 docket join in a Colorado trial to test the efficacy and benefits of changing Qwest's Firm Order Confirmation (FOC) processes with regard to 2/4 Wire Nonloaded Loops, ADSL Compatible Loops, ISDN Capable Loops and xDSL-I Capable Loops (collectively referred to as xDSL Loops). In particular, Qwest proposes to trial a xDSL Loop FOC for these loops instead of the current 24 hour FOC. The xDSL FOC entails Qwest doing additional work not included in the 24 hour FOC; specifically: (1) to confirm the availability of the requested loop by issuing the FOC after the design is complete, (2) confirming the due date and (3) issuing the FOC within 72 hours of the application date and time, (APP)[1]. The proposed process mirrors the Qwest process for retail design and access services. Thus, the trial holds out the prospect for significant benefits to CLECs and competition, and Qwest encourages the Colorado parties to participate in it.

Reasons for Trial

From a legal perspective, because this process may vary from current contractual obligations and does vary from the PID negotiated between Qwest ands CLECs in the Regional Oversight Committee (ROC) process, Qwest requests permission from the Colorado parties to employ it. Additionally, during the trial these xDSL orders will be eliminated from the Colorado PO-5 measure.

CLECs' Duties

Qwest asks that CLECs agree to trial this new process for a period of 2 months, starting March1, 2001. Qwest also asks CLECs to meet with Qwest to discuss the benefits of the process and ways to improve it. In addition, if the trial is a success, Qwest asks that the CLECs take the following steps:

1. Recommend in writing the new process to other Colorado CLECs; and
2. Jointly recommend with Qwest that we amend the PID for measure PO-5 (FOCs On Time) with regard to xDSL Loops

Description of Process

The following describes the xDSL FOC Trial:

1. Pre-order, CLEC should use the IMA Raw Loop Data Tool (RLDT) to determine whether an appropriate loop is available or conditioning is necessary. This will provide the CLEC with a preliminary indication of the need for conditioning and the 15 day interval.
2. CLEC then places an order using the LSR. On that order, depending on the information uncovered in RLDT, CLEC shall elect one of two options:
    - No Conditioning Approval and the standard service interval(i.e. 5 days), or
    - Conditioning Pre-Approved and the standard service interval (i.e. 5 days). For purposes of the trial Qwest, will accept the orders with a 5 day interval. However if the trial demonstrates that the loop make-up tools provide the CLECs with accurate information to make this determination, then the process

[1] For purposes of this document the Application Date and Time will simply be referred to as the APP.

will be changed so that the CLEC will request the 15 day interval when the LSR is issued.

3. Once Qwest receives a complete and accurate LSR, it will access LFACS to attempt to assign pairs not in need of conditioning and create a design of the loop.[2]

   - If the facilities exits and a valid design is created, then
     - ✓ A FOC will be returned within 72 hours of the APP providing for a 5-day interval measured from the APP.

4. If facilities do not exist to create a valid design, Qwest will employ other methods, described in the attached 11 Step Process, to attempt to find an appropriate pair not in need of conditioning or, if no such pair exists, an appropriate pair that requires conditioning. The issues and question in the 11 Step Process will be reviewed each time, however not every step will apply to every situation.

   - If appropriate pairs and a design can be completed without the need for conditioning, then
     - ✓ A FOC will be returned within 72 hours of the APP providing for a 5-day interval measured from the APP.
   - If this process locates appropriate pairs in need of conditioning, then
     - ✓ If no pre-approval for conditioning was included on the LSR, Qwest will contact CLEC, according to CLEC specifications, and inform CLEC of the

[2] Qwest takes this step for CLECs because LFACS may reveal information not available through the RLDT, especially with regard to loops not already connected to a switch. The RLDT provides information from the Loop Qualification Database (LQDB), which in turn is derived from LFACS and other sources. But the LQDB covers only loops connected to a switch. LFACS, on the other hand, contains information for all facilities, even those not connected to a switch, but does not contain some of the information

need for conditioning. If CLEC wishes to avail itself of conditioning, it must then submit a supplemental LSR with a "Y' in the SCA field, within 48 hours. A FOC reflecting the new due date will be returned when the design is complete and within 72 hours of the APP of the Supplemental LSR. The new DD will by 15 days from the APP date of the Supplemental LSR. Absent submission of a Supplemental LSR, Qwest will reject the order through a rejection notice sent to CLEC.

- ✓ If conditioning was pre-approved, Qwest will return a FOC within 72 hours of APP with a due date consistent with the 15 business day interval measured from the APP.

- If no appropriate pairs were found at all, then
  - ✓ If the steps taken reveal that a facility build that would satisfy CLEC's order is scheduled, then a FOC will be issued when a "ready for service" date for the facility build is received.
  - ✓ If the steps taken reveal that there is no facility build scheduled that would satisfy CLEC's order, then Qwest will reject the order through a rejection notice sent to CLEC. This scenario also includes requests for copper loops but only pair gain is available.

Trial Tracking

1. Qwest will track the trial as follows:

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available through the RLDT, such as the results of the MLT. Qwest does not perform this step for Megabit orders.

- The percent of FOCs returned in 72 hours. This tracking will mirror the PO-5 measurement except the interval will be 72 hours not 24 hours.
- The percent of Due Dates met. This tracking will mirror OP-3 and DD met will mean that the DD returned on the FOC matches the Completion Date. The OP-3 exclusions will apply. Additionally Qwest will report the reasons that the DD was missed by the following categories:
    1. Customer reasons
    2. Conditioning being identified after the FOC
    3. Other Qwest facility reasons
    4. Other Qwest non-facility reasons
- The Installation Interval. This tracking will mirror OP-4, except it will separate conditioned and non-conditioned loops. The OP-4 exclusions will apply.
- The percent of orders that the Raw Loop Data tool correctly identified as needing to be conditioned. For the trial Qwest employees will access the IMA Raw Loop Data Tool for every Colorado xDSL order and using the data supplied determine if conditioning is required. The need for conditioning information will be stored for measurement purposes. Then upon completion the actual need for conditioning will be tracked in three categories: was the need to condition identified prior to the FOC, after the FOC but before the DD, or on the DD on test and turn-up.
- The percent of orders that result in a cancellation notice rather than an FOC.

- Data under these temporary metrics will be reported a monthly basis to all participating CLECs.

2. The Trial will be deemed a success if 90% of the FOCs accurately reflect a 5 day or 15 day interval.

Qwest will request that one hour be set aside during the Colorado Workshop scheduled for the week of February 19 to discuss the details of the proposed trial and to answer any questions that your company may have about the trial. We sincerely hope to obtain 100% participation in the trial, which will yield performance data in advance of the 271 loop workshop. Unless a CLEC opts out of the trial they will be included. To opt out of the trial the CLEC must inform Qwest in writing through the formal workshop process. Based on past experience, the best success is obtained when uniform processes apply to all CLECs. Then all parties can use their experience from the trial to determine whether the FOC changes proposed by Qwest are sufficient or whether additional changes are necessary to meet competitive demands.

11 Step Process

1. PERFORM ASG SO TRANSACTION

   - On the Assignment Service Order (ASG SO) screen, populate the Next: with E. This process will let the system try to reassign the order including Line Station Transfer (LST). This will re-execute the order within LFACS in an attempt to assign compatible facilities that recently became available.

2. REVIEW THE RMA

   - Determine Service Type and any line quantity (LQTY) requirements. This will acquaint the Assignor with the specific requirements of the service request.
   - Review the terminal ACP's, LST's attempted, and TEA remarks. This will acquaint the Assignor with limitations set within the LFACS database that could possibly be overridden to relieve facilities.
   - If the Service Order request is for a 56/64 Kps, see Total Reach DDS Process.(Not available for Unbundled Loops) URL: http://rock.uswc.uswest.com/CERep/57/0-4263857/Title.html

3. INVESTIGATE THE RANGE OF FACILITIES

   - Look for the presence of PC Counts, Fill Counts, Physical or Admin Capacity limits. This will acquaint the Assignor with limitations set within the LFACS database that could possibly be changed to relieve facilities.
   - Investigate assignment and cross connect Restrictions. This will acquaint the Assignor with limitations set within the LFACS database that could possibly be changed to relieve facilities.
   - Perform an inquiry OEC report LST increasing the number of LST steps to a maximum of 3.
   - Look for cuts (LST's) to clear copper pairs or non-loaded pairs for your order. If a POTS customer is working on a "Conditioned pair", move the POTS customer from the "conditioned pair" to other facilities. The "conditioned pair" will then be assigned to the service request.

4. RUN HOMT RPT

   - Investigate any spare/CT/CF/PCF pairs for status problems. This will discover pairs that may be statused incorrectly within LFACS.
   - If there is working service and Soft Dial Tone (SDT) at the same address, issue a SDT disconnect and assign the service order.
   - Remove any Primary and Secondary commits (other than at an ENCAP) and assign the order. Primary and Secondary commit statuses will not allow the pairs to be used at other address. By removing the Primary/Secondary commit status we can allow the pairs to be assigned to another address.
   - Investigate all SDT loops. If any appear at an address with working service - issue SDT disconnect. The SDT facilities can then be used for the Service Request.

- Investigate any defective pairs status "Working". If the cable pairs are not "working" remove the defective status and use the pair for the Service Request.
- Investigate validity of all restricted pairs. If the restrictions are no longer valid, use the pair for the Service Request.
- Check current status of all past due orders and take appropriate action. Service order completion/cancellations sometimes fails to process correctly. This will identify potential spare facilities.
- Run the pending order query (RPT PDL RGORD) against TEA and check current status of all pending orders. Service order completion/cancellations sometimes fails to process correctly. This will identify potential spare facilities.
- Use OEC Chart to determine possible Pair Gain Card changes. (Existing Pair Gain Line Terminal status may not be compatible for the service request. If possible change the Pair Gain Card to a compatible status).

5. INVESTIGATE THE FACILITY ADDRESSES

- Investigate all Facility Addresses (perform an INQ Term transaction) for pairs that may have a status preventing it from being assigned.
- Also investigate similar street addresses - (perform an INQ Term transaction) may have different directional or street names that are bogus that could release facilities.

6. INVESTIGATE MULTIPLE TERMINAL SITUATIONS

- Run Report ACR - check for "A and B" Terminals. (This will identify situations where cable counts appear in more than one terminal. If they "multiple", investigate the possibility of doing a LST to free up a cable pair within service requested terminal).
- Perform Step 4 for all multiple terminals.
- Investigate LST candidates that are not assignable by auto flow of the system. (If the ACP setting for LSTs is set below "3", Perform the RPT LST with a setting of "3" to identify assignable LSTs).

7 LOOK FOR SOFT DIAL TONE BREAKS

- Use SDT aging policy.

8. CHECK FOR DEPLOYABILITY OF CENTRAL OFFICE UDC

- Is office equipped with UDC and are Spares available (See UDC Guidelines).
- If the line on the order is an ADL, check Main line for UDC Compatibility.

9. CHECK FOR PAIR GAIN UDC DEPLOYMENT

- When encountering a F2 problem SLC96, DISC*S, SLC5, SLC2T, UISC, 96SL5, 96ISC, or 96DIS UDC's may be deployed on IPG or PG. You must have consecutive odd and even channels available.

- When encountering a F1 problem SLC96, SLC5,or SLC2T UDC's may be deployed on IPG or PG. Look at the HOMT Report for a Defective even Channel. This should only be used when the terminal has less than 5% Defective Pairs per the HOMT Paddle Report. See SLC UDC Guidelines.

10. CLEAR DEFECTIVE PAIRS

- For F1 issues: If the terminal has 5% or greater Defective Pairs per the HOMT Paddle Report: Set Held and follow local practices for WFA/DO and Defective Pair issuance. If so, status the RTT Ticket DPR_TO_LNO with appropriate notes.
- For Fn issues: Follow local practices/agreements as to what will be a WFA/DO package. If so, status the RTT Ticket DPR_TO_LNO with appropriate notes.

11. TERMINAL ENLARGEMENT – Distribution Terminal Only

- If the terminal has less than 5% Defective Pairs per the HOMT Paddle Report: Determine if the Terminal Enlargement process can be used. If so, status the RTT Ticket REF_FS with appropriate notes. (This process should be used only for POTS service requests).

Scenario 1 –
Loop Type: 2-wire Non-Loaded
SCA: Y, CLEC approves conditioning up front
DDD: 5 days, the CLEC desired due date is 5 business days out.
Conditioning: Loop does need to be conditioned
Assumption: Qwest makes the 15 day conditioning DD.

Issue	CLEC No-72 Hour FOC	CLEC Has 72 Hour FOC	xDSL Trial
FOC	Within 24 hours CLEC receives an FOC with a 5 day due date. Then when need for conditioning is identified, the DD gets pushed out 15 days and another FOC is sent to the CLEC.	Within 72 hours CLEC receives an FOC with a DD measured out 15 days from the time we discovered conditioning was required.	Within 72 hours CLEC receives an FOC with a due date out 15 business days from the APP date.
FOC PO-5	Met	Not Included in Measure	Met
DD OP-3	Missed	Missed	Met

Scenario 2 –
Loop Type: 2-wire Non-Loaded
SCA: Y, CLEC approves conditioning up front
DDD: 5 days
Conditioning: Loop does not need to be conditioned
Assumption: Qwest makes the 5 day conditioning interval.

Issue	CLEC No-72 Hour FOC	CLEC Has 72 Hour FOC	xDSL Trial
FOC	Within 24 hours CLEC receives an FOC with a 5 day due date.	Within 72 hours CLEC receives an FOC with a 5 day DD.	Within 72 hours CLEC receives an FOC with a 5 day due date.
FOC PID	Met	Excluded from the measure	Met
DD PID	Met	Missed	Met

S**cenario 3** –
Loop Type: 2-wire Non-Loaded
SCA: Y, CLEC approves conditioning up front
DDD: 5 days, the CLEC desired due date is 5 business days out.
Conditioning: No facilities exist to provision the loop
Assumption: No growth job scheduled.

Issue	CLEC No-72 Hour FOC	CLEC Has 72 Hour FOC	xDSL Trial
FOC	Within 24 hours CLEC receives an FOC with a 5 day due date. Then when Qwest determines no facilities exist a jeopardy report is sent to the CLEC..	Within 72 hours CLEC may receive an FOC with a 5 day DD, or may receive a jeopardy notice that no facilities are available. The order still has the 5 day DD.	Within 72 hours CLEC receives a jeopardy notice that the order is pending engineering review. If no facilities are found then they receive a reject notice saying order cancelled

			for no facilities.
FOC PID	Met	Met	NA
DD PID	Missed	Missed	NA