

Attachment 1—Issues List for the Second Six-Month Review of the Washington Performance Assurance Plan

Issue	Raised By	Qwest Position	CLEC Position	Staff Position	Is the issue Disputed (Y/N)?	Does Qwest believe hearing is needed?	What factual disputes exist?
<p>1. Line Splitting:                      What standard should be used for this product for the MR-3, 4, 6 and 8 and the OP-5 PIDs?</p>	<p>Covad, MCI, and Qwest</p>	<p>Parity with Qwest DSL.</p>	<p>Incorporate the LTPA facilitator’s and State Staff recommendation to implement the standard of parity with “Res and Bus POTS” for line splitting for OP-5A, MR-3, 4, 6, and 8.</p>	<p>TBD</p>	<p>Y</p>	<p>Y</p>	<p>Is it true that Qwest did not propose a change in the benchmark for the Line Sharing product to use Qwest DSL as the standard, prior to the LTPA discussions? Were volumes of non-design provisioned Qwest DSL sufficient to have supported use of that</p>

							product as a standard for Line Sharing at the time the technology changed from design to non design provisioning ? Does any other Qwest state use Qwest DSL as the retail comparative for Line Sharing? Should the standard for Line Sharing be used as the basis for establishing the standard for Line Splitting? Does Qwest's
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							<p>omission for a period of time to propose a change in the standard for Line Sharing require it to adopt that same standard for Line Splitting? If Line Sharing is eliminated over the next two years per the TRO, what other reason is there to use the Line Sharing standard for Line Splitting? On what basis should</p>
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							standards for performance measurement for Line Splitting be established?
2. Loop Splitting: Should this product be added to the PO-5, OP-3, 4, 5, 6 and 15, MR-3, 4, 6, 7 and 8 PIDs and if so, what standard should apply?	Covad, MCI, and Qwest	Do not add this product to the PIDs.	Incorporate the LTPA facilitator's and State Staff recommendation to begin reporting loop splitting for PO-5, OP-3, 4, 5, 6 and 15, MR-3, 4, 6, 7 and 8 with a diagnostic standard for six-months.	TBD	Y	Y	Is there any actual demand for this product? Is there any performance to report? Is there any evidence that Qwest is discriminating against CLECs in its activities with regard to Loop Splitting in such a way as to justify imposition of this reporting

							<p>requirement ? What has changed since the Commission approved the SGAT without reporting obligations for Loop Splitting? Is it true that absent any confidence that unbundled loop splitting, provisioning and repair will go smoothly, CLECs likely will not make the transition from line splitting to loop</p>
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							splitting? How would Qwest assure the accuracy of the reports? Will the six month diagnostic period proposed by the CLECs provide the needed measurement stabilization time if there is no volume ordered by CLECs during that six months? How can a standard be set without commercial activity for a product?
3. XDSL-i	Eschelon	Do not add these	Incorporate the	TBD	Y	Y	Is it true that

<p>products: Should these products be added to the PIDs and if so, what standard should apply and if not, what alternative should be approved?</p>	<p>and Qwest</p>	<p>products to the PIDs, but Qwest will report them for informational purposes with no associated standard. If these products are added to the PIDs, the standard should be parity with Qwest's retail iDSL service.</p>	<p>LTPA facilitator's and State Staff recommendation to report xDSL-i capable loops in ordering/provisioning ("OP") and maintenance/repair ("MR") PIDs using the same standard that is used for ISDN-capable loops beginning with June performance reported in July.</p>				<p>if Qwest provides non-discriminatory treatment for all other products under the QPAP it is liable for payments? Is there evidence of discriminatory treatment by Qwest of XDSL-i products? What has changed since the Commission approved the QPAP without payment obligations for XDSL-i products that justifies imposing</p>
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							payment obligations on Qwest for such products? What is the proper standard for XDSL-i products if such products are added to the PIDs?
<p>4. PO-20:</p> <p>A. How will the new PO-20 be incorporated into Exhibit B?</p> <p>B. What Tier should be assigned to this new PID?</p> <p>C. Should Qwest be allowed a low volume exception?</p> <p>D. Should Qwest be allowed a “bum in</p>	<p>5A. MCI and Eschelon</p> <p>5B. MCI, Eschelon, and Qwest</p> <p>5C/D. Qwest</p>	<p>A. Qwest will file a new Exhibit B, and a new Exhibit K to address the coordinated substitution of the new PO-20 for the old PO-20. Exhibit B-1 will be deleted via a compliance filing once the expanded PO-20 goes into effect.</p>	<p>A. Qwest has agreed to file a revised Exhibit B to its SGAT that includes the agreed on PO-20 measure by June 30, 2004. Qwest will make any required PAP payments under the existing Tier 2 structure based on its performance under this</p>	TBD	Y	Y	<p>A. Is the CLEC’s position on this issue with regard to Tier 2 PAP payments possible to implement? How does the CLECs’ position on Tier 2 payments on this issue relate to</p>

<p>period?”</p>		<p>B. The expanded PO-20 should be assigned to Tier 1 Low, and should not be assigned any Tier 2 level.</p> <p>C. Qwest should be allowed “one free miss” when CLEC volumes are below twenty in a reporting period.</p> <p>D. Qwest should be allowed up to ninety days for each phase of the implementation of PO-20 during which the measurement stabilizes and Qwest validates the reporting. Qwest will make QPAP payments on the previous phase</p>	<p>Exhibit B version of PO-20.</p> <p>B. The treatment of the PO-20 measure in the PAP needs to be changed to Tier 1 High and Tier 2 Medium to be consistent with the treatment of the companion measure OP-5.</p> <p>C. The PAP’s treatment of low volume situations should be no different for PO-20 than for other measures in the PAP. See Sections 2.4 and 7.1 of the PAP.</p> <p>D. No 90-day burn in period is necessary for Qwest to implement PO-20.</p>			<p>their position on Issue 5 B?  B. Does PO-20 measure the end user customer’s experience or does it measure something else? Does the tier assignment of OP-5 control the tier assignment of PO-20? Do the majority of the errors captured in PO-20 have an impact on important end user customers’ telecommunications</p>
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		of the measure during the stabilization period.					services such that these customers are adversely affected? Does the existence of some service order errors indicate that Qwest uniformly fails to correct the errors measured by PO-20 despite multiple opportunities to do so? Do some errors reported in PO-20 get corrected before there is any
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							<p>impact on the end user customer?  Can PO-20 quantify harm to a CLEC such that a self-executing payment at the highest level is warranted?  Is it true that feature problems caused by the errors measured by PO-20 cause end user customers to change their carrier selection?  Is it true that Qwest's service order errors measured by PO-20</p>
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							<p>usually produce win-backs for Qwest? Is it true that most end user customers consider Qwest's errors measured by PO-20 significant and will switch carriers when the errors are detected? Is it true that most end user customers can detect the errors measured by PO-20? Is it true that correcting and</p>
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							responding to the errors measured by PO-20 places resource burdens and extra work on CLECs? Does aggregate reporting at the product level create a justification for Tier 1 High assignment? Is it true that the majority of errors measured by PO-20 almost always cause end user outages that impose resource burdens and
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							extra work on CLECs? Has the need for Tier 2 payments been eliminated now that CLEC specific results will be reported? Do the errors captured in PO-20 overlap with performance reported in other performance measurements already subject to payments under the PAP? Is the performance reported in PO-20
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							competitively significant enough to warrant assignment to Tier 1 High in the PAP? C. Do paragraphs 2.4 and 7.1 duplicate the relief Qwest seeks for PO-20 where CLEC volumes are less than twenty in a reporting period? D. Is a measurement stabilization period necessary for the implementation of each
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							phase of the expanded PO-20?
5. What changes should be made to modify the QPAP for Qwest's May 6, 2004 filing and any additional filing to incorporate PO-20 that changed Exhibit B to reflect LTPA agreements?	Qwest	<p>A. There are no required QPAP wording changes as a result of the May 6, 2004 PID change filing.</p> <p>B. Section 7.4 and Attachment 1 require changes to reflect the new PO-20 and elimination of the old PO-20.</p>	<p>A. There are no required QPAP wording changes as a result of the May 6, 2004 PID change filing.</p> <p>B. Appropriate changes to Exhibit K will be made based on resolution of the issues in Issue 4 above.</p>	TBD	<p>A. No.</p> <p>B. Yes as set forth in Issue 4 above.</p>	Yes to the extent set forth in Issue 4 above.	<p>Unclear. The CLECs' position on Issue 4 A is contradictor y to their position on issue 5 B. The CLECs appear to dispute in Issue 4 A that any changes to Exhibit K are necessary to effectuate the substitution of the expanded PO-20 for the existing PO-20 with respect to Tier 2. Based on</p>

							that, a disputed issue of fact is whether any changes to Exhibit K are necessary for this purpose.
6. Should Qwest be required to publish its aggregate payments under QPAP?	Covad, Eschelon, and MCI	Qwest should not be required to publish aggregate payments under QPAP. This issue should not be considered in this six month review because it is outside the scope of issues in Section 16.1 of the QPAP for consideration in a six month review.	Require Qwest to make available CLEC aggregate PAP performance and payment reports at the product level (e.g., report payments for “MR-8- DS- 1 capable loops” rather than payments for the measure MR-8) for the state of Washington on Qwest’s website.	TBD	Yes	Yes	Is there any reason for this requirement besides the statement by CLECs that they want it? Has there been a change in circumstances since the Commission established the QPAP without this requirement that justifies imposing this

							requirement ? Would the availability of information on aggregate payments by product add anything to the CLECs' ability to detect discriminatory treatment by Qwest compared to their ability to detect such treatment using information that is currently provided? Does Qwest currently report this information
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							to the WUTC, as Staff has represented?
7. Should a low-volume exception to QPAP payment requirements exist for the line splitting product as measured by the OP-3 PID?	Qwest	Qwest should be allowed “one free miss” when CLEC volumes are below twenty in a reporting period.	Qwest should not be allowed “one free miss” when CLEC volumes are below twenty in a reporting period. See Issue 4C.	TBD	Y	Y	Is it true that the same relief Qwest seeks in the form of “one free miss” in a reporting period when CLEC volumes are less than twenty in a reporting period is duplicated by other relief already available under the QPAP?
8. Does the Commission concur in Qwest's proposal to no longer participate in the	Staff	The Commission should not consider this issue in the six month review because it is outside	Unknown.	Staff's position is that the Commission should not	Y	Y	Unknown. Staff did not announce this issue before the

long term PID administration collaborative?		the scope of issues in Section 16.1 of the QPAP. The Commission does not have authority to compel Qwest to participate in the LTPA.		concur in Qwest's proposal to withdraw from the collaborative.			end of the discovery period.
9. How issues such as the standards for OP-5B get established if Qwest refuses to participate in LTPA going forward.	Eschelon	The Commission should not consider this issue in the six month review because it is outside the scope of issues in Section 16.1 of the QPAP. The Commission does not have authority to compel Qwest to participate in the LTPA.	Unknown. Neither Eschelon nor any other CLEC has announced a position on this issue.	TBD	Yes	Yes	Unknown. Eschelon did not state its position or announce this issue before the end of the discovery period.