

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of)	Docket No. UT-100820
)	
QWEST COMMUNICATIONS)	
INTERNATIONAL, INC. AND)	
CENTURYTEL, INC.)	
)	
For Approval of Indirect Transfer of)	
Control of Qwest Corporation, Qwest)	
Communications Company LLC, and)	
Qwest LD Corp.)	
)	
.....)	

EXHIBIT BJJ-28

TO THE

RESPONSIVE TESTIMONY

OF

BONNIE JOHNSON

ON BEHALF OF INTEGRA TELECOM

September 27, 2010



August 5, 2010

Kim Isaacs
United Communications Inc
6160 Golden Hills Drive
Golden Valley, MN 55416
kdisaacs@integratelecom.com

TO: Kim Isaacs

Announcement Date:	August 5, 2010
Proposed Effective Date:	September 13, 2010
Notification Number:	PROD.INTE.08.05.10.F.07881.UBL_ADSL_V24
Notification Category:	Product Notification
Target Audience:	CLECs, Resellers
Subject:	CMP- Unbundled Local Loop - Asymmetric Digital Subscriber Line (ADSL) Compatible Loop - V24.0
Level of Change:	Level 3

Summary of Change:

On August 5, 2010, Qwest will post planned updates to its Wholesale Product Catalog that includes new/revised documentation for Unbundled Local Loop - Asymmetric Digital Subscriber Line (ADSL) Compatible Loop - V24.0. These will be posted to the Qwest Wholesale Document Review site at <http://www.qwest.com/wholesale/cmp/review.html>.

Qwest is updating this document to include a change in process. In the Implementation section of this document under Provisioning and Installation, information is being added regarding performance testing. Additionally, information is being added to clarify that service requests will be rejected if they do not meet the performance test parameters applicable to the product selected by the CLEC and that the standard jeopardy procedure will be followed.

Current operational documentation is found on the Qwest Wholesale Web site at <http://www.qwest.com/wholesale/pcat/unloopadslcompatloop.html>.

Comment Cycle:

Qwest encourages you to review the planned documentation changes and submit questions or comments at any time during the comment cycle as listed in the table below. 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 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>.

To submit questions or comments on these changes, go to the Qwest Wholesale CMP Comment Process page at <http://qwestapps.com/wholesale/cmp/comment.cfm> and fill in all fields. Or you may submit comments by e-mail to cmpcomm@qwest.com. Be sure to reference the Notification Number listed above.

These documents will remain on the Qwest Wholesale Document Review Web site until the end of the comment cycle and will then be moved to the Qwest Wholesale Document Archive at http://www.qwest.com/wholesale/cmp/review_archive.html.

Timeline:

Planned updates available on Document Review Web site	August 5, 2010
CLEC Comment Cycle begins	August 6, 2010
CLEC Comment Cycle ends	5:00 PM MT, August 20, 2010
Qwest response to CLEC Comments (if applicable)	August 27, 2010 http://www.qwest.com/wholesale/cmp/review_archive.html
Proposed Effective Date	September 13, 2010

If you have any questions on this subject, please submit comments at <http://qwestapps.com/wholesale/cmp/comment.cfm>.

Sincerely,

Qwest Corporation

Note: If you would like to subscribe, unsubscribe or change your current profile to Qwest Wholesale mailouts please go to the 'Subscribe/Unsubscribe' web site and follow the subscription instructions. The site is located at:

<http://www.qwest.com/wholesale/notices/cnla/maillist.html>

cc: Stephanie Smith

Maryann Wiborg or Rita Urevig

Qwest Communications, 120 Lenora St, 11th Floor, Seattle WA 98121

From: Redman-Carter, Julia [mailto:Julia.Redman-Carter@PAETEC.com]
Sent: Friday, August 20, 2010 3:18 PM
To: 'cmpcr@qwest.com'
Cc: Isaacs, Kimberly D.; Johnson, Bonnie J.; Bilow, Joyce
Subject: FW: PROD.INTE.08.05.10.F.07881.UBL_ADSL_V24

Qwest,

This email is a copy of what PAETEC submitted in the CLEC comments.

PAETEC agrees with Integra's comments, concerns, positions, and poses the same questions to Qwest. Additionally, see the following questions below.

Please explain how existing CLEC customers with the ADSL and grandfathered ADSL Compatible Loops are to obtain repair, maintenance, etc if new ICAs don't have the ADSL language Qwest is requiring as referenced in the PCAT? Likewise, for testing and repair, what language specifics satisfy Qwest's proposed PCAT requirement ("Performance testing available on ADSL Compatible Loop is specified in your Interconnection Agreement (ICA)?"

Qwest's espoused position is that the ICAs contain general terms and conditions, and the processes and associated detail are covered in the PCAT. Our current ICAs may have ADSL, but not include the testing detail Qwest's PCAT is now referencing. How would Qwest propose that the language be changed to address this issue? Likewise, how does this situation work when an ICA is silent?

In light of Integra's 8-18-2010 response/comments and PAETEC's additional concerns/queries noted above, PAETEC reaffirms Integra's request that Qwest retract the proposed changes, at least until the questions are answered satisfactorily and parties to the ICAs can affirm that the PCAT changes will not be modifying existing terms and interpretations under which we have been operating.

Julia



Julia Redman-Carter
Carrier Relations Manager
(319) 790-2250 Office
(319) 790-7901 Fax
julia.redman-carter@paetec.com

September 7, 2010

FINAL
August 31, 2010
Ad hoc meeting minutes
Level 3 Notice PROD.INTE.08.05.10.F.07881.UBL_ADSL_V24

Attendees: Kasha Fauscett – Comcast, Bonnie Johnson – Integra, Kim Isaacs – Integra, Sandra Andreed – Granite, Chris Gaudreau – Granite, Jim Hickle – Velocity, Jamie Nelson - POPP, Bob Mohr – Qwest, Jamal Boudhaouia – Qwest, Linda Harmon – Qwest, John Hansen – Qwest, Rachel Ruiz - Qwest, Susan Lorence - Qwest

Susan Lorence – Qwest began the meeting by providing a background on the Level 3 Notice PROD.INTE.08.05.10.F.07881.UBL_ADSL_V24 which was distributed August 5. The update to the unbundled ADSL PCAT included a change in process to performance testing and a clarification that service requests will be rejected if they don't meet the performance parameters associated with the product as requested by the customer. On August 18, Qwest received comments from Integra that included an objection and a request to retract the change. On August 20, Qwest received comments from PAETEC with similar objections. On August 27, Qwest sent out a delayed response notice identifying that we would be discussing the comments in an ad hoc meeting. Susan said both comments and the Qwest response are attached to the calendar entry.

Bob Mohr – Qwest indicated that the August 5 notice was a change to the ADSL PCAT where two changes are proposed in the Provisioning and Installation section. The first change is to add an additional performance test to what we currently perform and the second change is to clarify that test results will be provided to you through CEMR. Bob also described the jeopardy process that will take place. Bob asked if there were any questions. There were none.

Jamal Boudhaouia – Qwest then began to review each CLEC comment and the Qwest response starting with the first and second comments from Integra. (See document posted to the Wholesale calendar <http://wholesalecalendar.qwestapps.com/> for each CLEC comment and the Qwest response.) Jamal said to stop him with any questions.

Bonnie Johnson – Integra asked if a CLEC has 196KHz, are you saying that you have not been performing that if it is in their ICA.

Jamal Boudhaouia – Qwest responded that we do perform the test but we don't report it back to you.

Bonnie Johnson – Integra questioned if there was a misstatement then since the notice indicates this is a change in process. The update and Qwest response says Qwest will perform the 196KHz test in addition to the current tests.

Jamal Boudhaouia – Qwest indicated that this is not a misstatement. Jamal said Qwest is in the process of implementing it but previously we haven't performed the test and are trying to determine the feasibility of it. Jamal said we have new test gear and it is working pretty well so we are going to start reporting back. Jamal said we have not done the test in the past.

Bonnie Johnson – Integra said that was not true then that you said you were performing the 196KHz but not reporting it; Qwest just started doing the test.

September 7, 2010

Jamal Boudhaouia – Qwest indicated that was correct. We just started the test about 3 - 4 weeks ago. Jamal then reviewed the third CLEC question and response. Jamal added that for impulse noise, we have not tested it nor do we plan on testing it at this point in time. Jamal then reviewed the fourth CLEC question and response.

Kim Isaacs – Integra requested confirmation that the test is an actual measured loss.

Jamal Boudhaouia – Qwest said that yes it is. Jamal then reviewed the fifth CLEC question and response.

Susan Lorence – Qwest requested call attendees open the revised PCAT posted to the calendar so that they can see the proposed change.

Kim Isaacs – Integra said that it indicates the tests results will be provided in CEMR and asked where.

Jamal Boudhaouia – Qwest relayed the test results will be provided in the CEMR Demarc section.

Bonnie Johnson – Integra asked if this is a change that will be made to CEMR.

Jamal Boudhaouia – Qwest indicated that it is an addition. There is no change to CEMR code but it will be added to the Demarc section.

Bonnie Johnson – Integra asked if it has been added yet.

Jamal Boudhaouia – Qwest indicated not yet. Jamal said we have been testing it but we have not been putting that information in there.

Susan Lorence – Qwest indicated that the change does not require a CEMR release but that we are just reporting results in existing fields.

Jamal Boudhaouia – Qwest indicated that is correct. We are not changing field length or the field position but using a free form flow field. Jamal asked if there were any other questions before moving forward and there were none. Jamal then reviewed the sixth CLEC question and response and then on to the seventh question and response.

Bonnie Johnson – Integra said the response to number seven does not answer the question and asked to have the question answered.

Jamal Boudhaouia – Qwest said that Qwest is just adding clarification that we will perform the 196 KHz testing in addition to the current test.

Bonnie Johnson – Integra questioned that regardless of what language is in your ICA about testing, Qwest will do these tests?

Jamal Boudhaouia – Qwest said yes.

Kim Isaacs – Integra asked if Qwest is just going to do 196KHz insertion loss tests and that is it.

Jamal Boudhaouia – Qwest relayed that we will do the current tests and provided a variety of test names and said those will all continue to be performed.

September 7, 2010

Kim Isaacs – Integra said plus the 196KHz but not impulse noise.

Jamal Boudhaouia – Qwest relayed that at this point, we are not planning on it. Jamal asked if this answered their questions and both said it did.

Jamal Boudhaouia – Qwest reviewed CLEC questions eight and nine which referred back to previous Qwest responses. Jamal then reviewed the CLEC question and the Qwest response number ten which related to the use of the jeopardy code C31. Jamal said that Qwest does not want to reject outright; that we want to provide the option to sup the order to a different NC/NCI code or cancel the order. We do not want to do this on our own.

Jim Hickle – Velocity asked wouldn't it make sense for the Qwest tech to share solutions at this time to move the process forward. Jim indicated this would eliminate the CLEC guessing and that it would be more proactive for Qwest to do this.

Jamal Boudhaouia – Qwest indicated that he cannot answer this question as this time and that we have to limit the options. Jamal said this is a whole other discussion as far as how we would do that. Jamal said if you want different DSL flavors, that is a whole different technical discussion and that he would be happy to discuss this offline or hold another call.

Jim Hickle – Velocity questioned what would occur if it was the Qwest retail environment vs. dealing with a wholesale customer. Jim indicated that he used to work for Qwest and that other solutions would be recommended if requested.

Jamal Boudhaouia – Qwest indicated in terms of services, sure.

Jim Hickle – Velocity indicated that he was not talking about services but about fixing a potential problem and whether there was someplace different we can move this to.

Jamal Boudhaouia – Qwest said if talking from a repair perspective, then yes we do this on a repair ticket.

Jim Hickle – Velocity disagreed and said you do this on a new order perspective also.

Jamal Boudhaouia – Qwest said he wanted to talk offline about options to provisioning an ADSL circuit.

Bonnie Johnson – Integra indicated she was not sure of what all of the discussion means but that discussing this offline (09-13-10 Comments in CAPS to minutes from Integra) IS NOT AN OPTIONS. ANY DISCUSSION should be more than just Jim.

Jamal Boudhaouia – Qwest indicated he would not exclude anyone.

Susan Lorence – Qwest said we need to get back to discussing the Level 3 change. Susan said anyone can issue a CR to propose a further change in process if that is desired or we can schedule a follow up call for discussion separate from this change. Susan indicated we have reviewed all of the Integra questions and will move to the PAETEC questions. Susan said the questions are basically the same discussion that Jamal had reviewed unless someone would like to specifically review them as well.

September 7, 2010

Jamal Boudhaouia – Qwest indicated that he agrees.

Bonnie Johnson – Integra said she wanted time to read through the questions and the Qwest responses to determine whether Integra agrees all of the questions are answered.

Susan Lorence – Qwest indicated since there is time remaining on the call, we would like to review the additional PCAT changes that were proposed to Version 24 based on the comments. Susan said we would like to get the test implemented and the information provided back. Susan said we wanted to review whether these updates clarify the change in process so Qwest can move forward with the change.

Bob Mohr – Qwest said there is a revised PCAT on the calendar that shows the most recent changes. Bob then reviewed the changes in the PCAT that are different from the original proposal which includes retracting the reference to the tests performed in your ICA and adding the 196 KHz test.

Jim Hickie – Velocity inquired if these changes were for all 14 states or just Minnesota.

Bob Mohr – Qwest indicated the change is global through all 14 states.

Bonnie Johnson – Integra said if Qwest is changing the initially proposed changes to the PCAT, doesn't this require a re-notice?

Susan Lorence – Qwest indicated that there are provisions on a Level 3 notice that say based on comments, we have to just be clear on what we are changing in the PCAT as part of the Qwest response to comments. Susan said our proposal would be to pick back up where we were on the final notice because we are not further changing the process; we are just clarifying the redlined PCAT updates as part of the response to comments. We would like to proceed with the final notice.

Bonnie Johnson – Integra said Integra wants to formally comment on the changes and that (09-13-10 Comments in CAPS or strikethrough to minutes from Integra) **JULIA/PAETEC ASKED FOR THIS CALL TO BE RESCHEDULED SO SHE COULD ATTEND. BONNIE SAID she guessed PAETEC would also want thatE opportunity TO COMMENT.**

Susan Lorence – Qwest said that we did provide the opportunity to comment on these changes and we have provided the revised red-line and gone through the comments. Susan said she was trying to understand why there was a need for another comment cycle and questioned whether there are additional comments that will substantially impact the changes going in.

Bonnie Johnson – Integra indicated that we provided a lot of comments and that Qwest said they have responded to all of those. Bonnie said she does not agree that just by removing a change that it appropriately responds to the question and wants more time to thoroughly go through the responses. She said there may be more questions and wants the opportunity to formally comment.

Susan Lorence – Qwest indicated that our approach will then be to re-notify with these proposed changes and start the comment cycle again to provide another opportunity for comments.

Bob Mohr – Qwest indicated that would be fine. Bob said Qwest sees this change as an enhancement to the CLEC experience and that we welcome the feedback. We really see this as an enhancement to the product and are anxious to implement it.

September 7, 2010

Susan Lorence – Qwest relayed that we will just start the whole cycle again. We will notify within the next couple of days and provide a 15 day comment cycle similar to last time. Susan said we will shorten the Qwest response cycle. If there are further questions, we will provide a response to those and then our 15 day implementation timeline.

Jamal Boudhaouia – Qwest indicated that this enhancement will provide more certainty and predictability if the facility or plant will support ADSL. Jamal said we are providing you with 196 KHz actual measured test results.

Susan Lorence – Qwest indicated that was our reason to want to move forward but we will plan to re-notify as Velocity and Integra have requested. Susan asked if there were any other questions. There were none. Susan reiterated that Qwest will re-notify with a Level 3 change with the red line updates that we have reviewed today and will put out a new time line.

Meeting adjourned at 9:41 am MT.



September 2, 2010

Kim Isaacs
Mountain TeleCommunications Inc
6160 Golden Hills Drive
Golden Valley, MN 55416
kdisaacs@integratetelecom.com

TO:Kim Isaacs

Announcement Date: September 2, 2010
Proposed Effective Date: October 11, 2010
Notification Number: PROD.INTE.09.02.10.F.08246.UBL_ADSL_V24_Renotice
Notification Category: Product Notification
Target Audience: CLECs, Resellers
Subject: CMP- Unbundled Local Loop - Asymmetric Digital Subscriber Line (ADSL) Compatible Loop - V24.0 - RENOTICE
Level of Change: Level 3

Summary of Change:

On September 2, 2010, Qwest will post planned updates to its Wholesale Product Catalog that includes new/revised documentation for Unbundled Local Loop - Asymmetric Digital Subscriber Line (ADSL) Compatible Loop - V24.0. These will be posted to the Qwest Wholesale Document Review site at <http://www.qwest.com/wholesale/cmp/review.html>.

NOTE: Qwest originally noticed this change on August 5, 2010 with notice number PROD.INTE.08.05.10.F.07881.UBL_ADSL_V24. Qwest held an ad hoc call on August 31, 2010 to discuss CLEC comments to the proposed change. For additional information regarding this ad hoc call, including the CLEC comments and the Qwest response, refer to the Wholesale Calendar entry at <http://wholesalecalendar.qwestapps.com/>. As a result of the comments and discussion during the ad hoc call, the PCAT has been revised and the comment cycle is being restarted.

Qwest is updating this document to include a change in process. In the Implementation section of this document under Provisioning and Installation, information is being added regarding performance testing. Additionally, information is being added to clarify that service requests will be rejected if they do not meet the performance test parameters applicable to the product selected by the CLEC and that the standard jeopardy procedure will be followed.

Current operational documentation is found on the Qwest Wholesale Web site at <http://www.qwest.com/wholesale/pcat/unloopadslcompatloop.html>.

Comment Cycle:

Qwest encourages you to review the planned documentation changes and submit questions or comments at any time during the comment cycle as listed in the table below. 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 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>.

To submit questions or comments on these changes, go to the Qwest Wholesale CMP Comment Process page at <http://qwestapps.com/wholesale/cmp/comment.cfm> and fill in all fields. Or you may submit comments by e-mail to cmpcomm@qwest.com. Be sure to reference the Notification Number listed above.

These documents will remain on the Qwest Wholesale Document Review Web site until the end of the comment cycle and will then be moved to the Qwest Wholesale Document Archive at http://www.qwest.com/wholesale/cmp/review_archive.html.

Timeline:

Planned updates available on Document Review Web site	September 2, 2010
CLEC Comment Cycle begins	September 3, 2010
CLEC Comment Cycle ends	5:00 PM MT, September 17, 2010
Qwest response to CLEC Comments (if applicable)	September 24, 2010 http://www.qwest.com/wholesale/cmp/review_archive.html
Proposed Effective Date	October 11, 2010

If you have any questions on this subject, please submit comments at <http://qwestapps.com/wholesale/cmp/comment.cfm>.

Sincerely,

Qwest Corporation

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement, 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 subscribe, unsubscribe or change your current profile to Qwest Wholesale mailouts please go to the 'Subscribe/Unsubscribe' web site and follow the subscription instructions. The site is located at:

<http://www.qwest.com/wholesale/notices/cnla/maillist.html>

cc: Stephanie Smith

Maryann Wiborg or Rita Urevig

Qwest Communications, 120 Lenora St, 11th Floor, Seattle WA 98121

Unbundled Local Loop – Asymmetric Digital Subscriber Line (ADSL) Compatible Loop – ~~V23.0~~V24.0

History Log (Link blue text to: [Replace Existing Download With attached Unbundled Local Loop – Asymmetric Digital Subscriber Line \(ADSL\) Compatible Loop History log](#))

NOTE: Existing Resale Qwest DSL service was grandparented effective January 28, 2006 and will not be available as a new service. Likewise, ADSL compatible UBL is not available in new contracts executed on the Negotiations Template after March 19, 2007. CLECs who sign the new contract will be able to maintain their existing ADSL Compatible UBLs until they are disconnected. No new ADSL Compatible UBLs can be ordered under this new contract. For information on alternative UNE products, contact your Qwest Sales Executive.

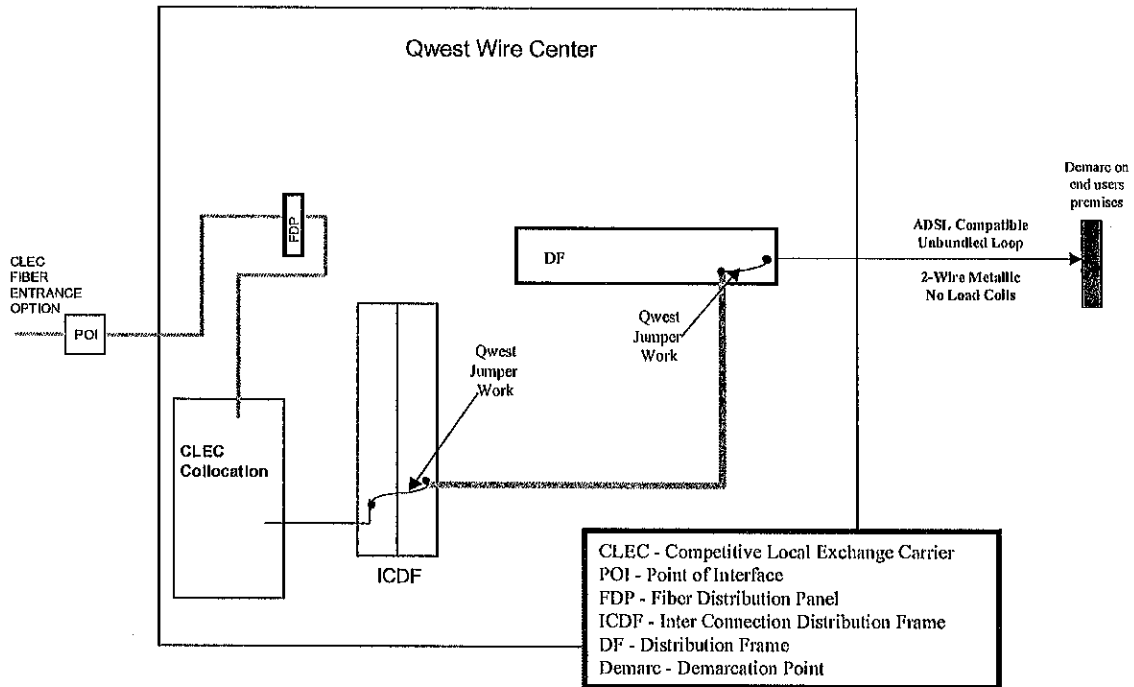
Product Description

Unbundled Local Loop Asymmetric Digital Subscriber Line (ADSL) Compatible Loop is an unbundled 2-wire metallic facility that establishes a transmission path between a Qwest Central Office (CO) Distribution Frame or equivalent and the loop demarcation point at an end-user premises. ADSL Compatible Loop is provided with the following characteristics:

- Metallic, Exchange cable facilities without Qwest active or passive equipment
- Facilities without Load Coils or Build out Capacitance
- Possibility of mixed gauges of cable
- Facilities that may have limited amounts of remaining Bridged Tap

General information regarding Unbundled Local Loop products is located in Unbundled Local Loop – General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html>)

Product Diagram



Availability

ADSL Compatible Loop is available where facilities exist throughout Qwest's 14-state local service territory. (Link blue text to: <http://www.qwest.com/wholesale/pcat/territory.html>)

Terms and Conditions

General Interconnection Agreement, regulations and policy information for ADSL Compatible Loop is described in the Terms and Conditions section of Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#pri>)

Technical Publications

Technical characteristics, including network Channel/Network Channel Interface (NC/NCI™) codes are described in Technical Publication, Interconnection – Unbundled Loop, 77384. (Link blue text to: <http://www.qwest.com/techpub/77384/77384.pdf>)

[Back to Top](#)

Pricing

Rate Structure

Recurring charges are comprised of the following rate elements:

- ADSL Compatible Loop
- Interconnection Tie Pair (ITP), per connection (two ITP for 4-Wire)

Recurring charges are billed on a month-to-month basis. Nonrecurring charges are billed at the time service is rendered. Term contracts are not available.

Nonrecurring charges depend on the Installation option chosen. Nonrecurring charges are billed at the time service is rendered. Term contracts are not available. A nonrecurring charge applies to the installation of service(s) and in some states a disconnect service(s) charge will apply.

Additional charges can apply. See Rate Structure under the Pricing section of Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#pri>)

Rates

Rates are available in Exhibit A or the specific rate sheet in your Interconnection Agreement. If there are elements that are not in your Interconnection Agreement, contact your Qwest Service Manager. (Link blue text to: <http://www.qwest.com/wholesale/clecs/accountmanagers.html>)

Tariffs, Regulations and Policies

Tariffs, regulations and policies are located in the state specific Tariffs/Catalogs/Price Lists. (Link to: <http://tariffs.qwest.com:8000/>)

Optional Features

There are no optional features available with ADSL Compatible Loop.

[Back to Top](#)

Features / Benefits

Features	Benefits
Market Presence	<ul style="list-style-type: none">• Allows you to provide Local Exchange services to your end-users
Low Cost	<ul style="list-style-type: none">• Allows you to lease facilities from Qwest at wholesale rates

[Back to Top](#)

Applications

See Features/Benefits.

[Back to Top](#)

Implementation

[Back to Top](#)

Product Prerequisites

If you are a new Competitive Local Exchange Carrier (CLEC) and are ready to do business with Qwest, view Getting Started as a Facility-Based CLEC. (Link to: http://www.qwest.com/wholesale/clecs/clec_index.html) If you are an existing CLEC wishing to amend your Interconnection Agreement or your New Customer Questionnaire, additional information is located in the Interconnection Agreement. (Link blue text to: <http://www.qwest.com/wholesale/clecs/negotiations.html>)

[Back to Top](#)

Pre-Ordering

General pre-ordering activities are described in the Pre-Ordering Overview. (Link blue text to: <http://www.qwest.com/wholesale/clecs/preordering.html>) The Interconnect Mediated Access (IMA) User's Guide specifically details the information applicable to pre-ordering functions. (Link blue text to: <http://www.qwest.com/wholesale/ima/gui/imauser.html>)

Loop Qualification

The Interconnect Mediated Access (IMA) User's Guide together with the Loop Qualification Raw Loop Data and CLEC Job Aid detail the information applicable to pre-ordering functions.

Qwest strongly recommends use of pre-ordering functionality to assist in achieving increased service request flow through and accuracy, which will result in reduced service request rejects.

The following activities may need to be performed by you in preparation for the issuance of the service request:

- Validate address
- Check facility availability
- Validate Connecting Facility Assignment (CFA)
- Review Customer Service Record (CSR)
- Loop Qualification – Query Unbundled Loop
- Query Raw Loop Data (RLD)

Information about the IMA based loop qualification queries are available in the IMA User's Guide (Link blue text to: <http://www.qwest.com/wholesale/ima/gui/imauser.html>) or the Pre-Ordering Overview. (Link blue text to: <http://www.qwest.com/wholesale/clecs/preordering.html>) The IMA Loop Qualification and Raw Loop Data-CLEC Job Aid (Link blue text to: http://www.qwest.com/wholesale/training/desc_loopqualjobaid.html) is a web-based training course designed to provide valuable information and instructions on how to use and interpret IMA-based loop qualification queries and the raw loop data queries.

These activities will enable you to verify the type of facility and the loop make-up of the Unbundled Local Loop, which will assist you in identifying the appropriate service request intervals located in the Service Interval Guide (SIG). (Link blue text to: <http://www.qwest.com/wholesale/guides/sig/index.html>)

Additional pre-ordering information is available in the Pre-Ordering section of Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#preorder>)

Ordering

General ordering activities are described in the Ordering Overview (Link blue text to: <http://qwest.com/wholesale/clecs/ordering.html>) and in the Ordering section of Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#order>)

Unbundled Local Loop Installations Options:

Six installation options are available for Unbundled Local Loop. Detailed information about the different installation options is available in the Ordering section of Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#order>)

Circuit ID (ECCKT)

ADSL Compatible Loops are assigned with Circuit Identification numbers. Detailed information about the Circuit Identification number format is available in the Ordering section of Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#order>)

Conditioning

ADSL Compatible Loop may require conditioning (removal of Load Coils and/or Interfering Bridged Taps). Specific information on loop conditioning is available in the Ordering section of the Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#order>)

Required Forms and Activity Types

ADSL Compatible Loop service requests are submitted using the following Local Service Ordering Guidelines (LSOG) forms:

- Local Service Request (LSR)
- End User (EU)
- Loop Service (LS)
- Directory Listing (DL), if applicable

Field Entry requirements are described in the LSOG. (Link blue text to: <http://www.qwest.com/wholesale/clecs/lso.html>) Valid LSR ACT types are described in the Ordering section of Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#order>)

Service requests should be placed using Interconnect Mediated Access (IMA) Extensible Markup Language (XML), (Link blue text to: <http://www.qwest.com/wholesale/ima/xml/index.html>) IMA Graphical User Interface (GUI), (Link blue text to: <http://www.qwest.com/wholesale/ima/gui/index.html>) or faxed to (888) 796-9089.

A Design Layout Record (DLR) request) is described in the IMA XML Network Disclosure Document (Link blue text to: <http://www.qwest.com/disclosures/netdisclosure409.html>) and the IMA User's Guide. (Link blue text to: <http://www.qwest.com/wholesale/ima/gui/imauser.html>)

[Back to Top](#)

Provisioning and Installation

General provisioning and installation activities are described in the Provisioning and Installation Overview (Link blue text to: <http://qwest.com/wholesale/clecs/provisioning.html>) and in the Provisioning and Installation section of Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#pro>)

Firm Order Confirmation (FOC) intervals are located in the SIG. (Link blue text to: <http://www.qwest.com/wholesale/guides/sig/index.html>)

A jeopardy occurs on a service request if a condition exists that threatens timely completion. Jeopardy notifications are described in the Provisioning and Installation Overview. (Link blue text to: <http://www.qwest.com/wholesale/clecs/provisioning.html>)

Cooperative Testing information is available in the Provisioning and Installation section of Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#pro>)

Performance testing available on ADSL Compatible Loop is specified in your Interconnection Agreement (ICA). In addition to such tests, Qwest will also test Insertion Loss at 1004 Hertz (Hz).

Performance testing available on ADSL Compatible Loop includes:

- No Load Coils, Opens, Grounds, Shorts, Noise (copper facilities, or C-Message), or Foreign Volts
- Insertion Loss at 1004 Hertz (Hz)
- Insertion Loss at 196 KHz

Formatted

Formatted

Test results will be provided to you through CEMR.

Transmission performance parameters and limits are available in the Technical Publication, Interconnection – Unbundled Loop, 77384. (Link blue text to: <http://www.qwest.com/techpub/77384/77384.pdf>)

Loss and Completion Reports are generated based on loss and gain account activity. Loss and Completion Reports are described in Billing Information – Additional Outputs – SMDR, Completion Report, Loss Report. (Link blue text to: <http://www.qwest.com/wholesale/clecs/output.html>)

Spectrum Management information is available in the Provisioning section of Unbundled Local Loop - General Information. (Link blue text to: <http://www.qwest.com/wholesale/pcat/unloop.html#pro>)

Service requests can be rejected for various reasons including not meeting the performance testing parameters specified in your ICA. In these instances, Qwest will place the order in jeopardy using the C31 jeopardy code and the standard jeopardy process will be followed. Error

and rejection notifications are described in the Ordering Overview. Service request can be rejected for various reasons. Error and rejection notifications are described in the Ordering Overview. (Link blue text to: <http://www.qwest.com/clecs/ordering.html>)

Formatted

Hours of Operation

Installation hours are described in the Provisioning and Installation section of Unbundled Local Loop – General Information. (Link italicized text to: <http://www.qwest.com/wholesale/pcat/unloop.html#pro>)

[Back to Top](#)

Maintenance and Repair

General maintenance and repair activities are described in the Maintenance and Repair Overview. (Link blue text to: <http://www.qwest.com/wholesale/clecs/maintenance.html>)

[Back to Top](#)

Billing

Customer Records and Information System (CRIS) billing is described in Billing Information – Customer Records and Information System (CRIS). (Link blue text to: <http://qwest.com/wholesale/clecs/cris.html>)

Training

View Qwest courses by clicking on Course Catalog. (Link blue text to <http://www.qwest.com/wholesale/training/coursecatalog.html>)

[Back to Top](#)

Contacts

Qwest contact information is located in Wholesale Customer Contacts. (List blue text to: <http://www.qwest.com/wholesale/clecs/customercontacts.html>)

[Back to Top](#)

Frequently Asked Questions (FAQs)

This section is currently being compiled based on your feedback.

Last Update: ~~May 27, 2009~~ October 11, 2010

NC/NCI™ is a Trademark of Telcordia Technologies, Inc.

META Tags: Unbundled Local Loop, Unbundled Loop, Asymmetric Digital Subscriber Loop, Unbundled ADSL, LXR-

From: Johnson, Bonnie J.
Sent: Friday, September 17, 2010 4:52 PM
To: 'cmpcr@qwest.com'
Cc: Johnson, Bonnie J.; Isaacs, Kimberly D.; 'Jim Hickle'; Redman-Carter, Julia
Subject: FW: PROD.INTE.09.02.10.F.08246.UBL_ADSL_V24_Renotice

Integra's comments are attached.

Bonnie Johnson | Director Carrier Relations
direct 763.745.8464 | fax 763.745.8459
Integra Telecom | 8160 Golden Hills Drive | Golden Valley, MN 55416-1020
bjjohnson@integratelecom.com



From: bjjohnson@integratelecom.com [mailto:bjjohnson@integratelecom.com]
Sent: Friday, September 17, 2010 4:50 PM
To: Johnson, Bonnie J.
Subject: PROD.INTE.09.02.10.F.08246.UBL_ADSL_V24_Renotice

Thank you for submitting your comments through the Qwest CMP Document Review and Comment Process.

The information you entered is listed below.

If you have any questions, please direct them to cmpcomm@qwest.com.

This communication was sent with <http://qwestapps.com/wholesale/cmp/comment.cfm>.

=====

Notification Number: PROD.INTE.09.02.10.F.08246.UBL_ADSL_V24_Renotice
Comment:

See email sent to the CMPCR email address on 9/17/10. Integra's comments were sent via email due to formatting changes that occur when comments are submitted via this website

=====

Name: Bonnie Johnson
Title: Director Carrier Relations
Phone Number: 763 745-8464
E-mail Address: bjjohnson@integratelecom.com

Date/Time Submitted: 9/17/10 02:49:28PM

9/17/2010

Integra Comments for PROD.INTE.09.02.10.F.08246.UBL ADSL V24 Renotice

Qwest has revised its previously proposed ADSL PCAT changes so that Qwest is no longer proposing to delete the reference to the list of tests and so that Qwest is now proposing to add 196 kHz to that list. Qwest needs to test at digital levels for copper loops conditioned to transmit the digital signals needed to provide xDSL service.¹ Therefore, Qwest's finally indicating (via its proposed PCAT changes) that it will not restrict testing for ADSL to 1004 Hz and will test insertion loss at 196 kHz² is an improvement over Qwest's policy to date (as discussed further below). This one change, while important, does not bring Qwest into compliance with its obligations and industry standards, however. ADSL is a wide-band technology, and Qwest needs to perform wide-band testing for wide-band technologies. Testing at the POTS metallic parameters, the combination of the POTS metallic line tests with a 196 kHz Insertion Loss test may not assure that Qwest delivers a working ADSL compatible loop and could in some cases result in Qwest disqualifying loops that could support ADSL service. CLECs may transmit ADSL signals at frequency ranges starting at around 200 kHz. The 196 kHz Insertion Loss test is not the exclusive be all, end all ADSL performance test, as Qwest appears to suggest with its proposed PCAT changes. Qwest has provided no industry standard or other authority indicating that, by conducting one insertion loss test at one particular parameter (196 kHz), Qwest has met its testing obligations for ADSL. A 196kHz insertion loss test does not recognize that ADSL operates in frequency ranges above 196 kHz. Any changes to performance test parameters for ADSL service should recognize the fundamentals of ADSL service.

There are numerous characteristics of copper plant that can disrupt xDSL signals. Load coils and bridge tap are generally discussed because they represent equipment or techniques that can be "removed" from the loop in support of xDSL services. However, there are also characteristics of simple plant maintenance that can disrupt these types of signals. For example, when copper plant is not properly bonded to its grounding conductor, spurious noise from the environment (e.g., AM radio signals) can invade the copper circuit and disrupt the intended xDSL transmission. Whereas Qwest's inventory records (when accurate) may be used to identify specified interferes like load coils and bridge tap,³ only wide-band testing can verify the usefulness of a loop for wide-band xDSL service (such as ADSL) in relation to these less obvious sources of interference. Qwest needs to conduct wide-band testing to reflect or test how the line performs across the spectrum, including testing for environmental influences and spectral noise.

¹ 47 C.F.R. §51.319(a)(1)(iii)(C); TRO ¶ 249.

² Integra has previously used 196 kHz in CMP discussions of a range of parameters that may apply, with Integra clearly noting that it was an example within the context of HDSL (rather than ADSL, which is the subject of Qwest's current proposed changes). See, e.g., Escalation #45, Integra's CMP Position Statement, April 3, 2009, p. 12.

³ Although records may indicate the presence of interferers on one or more available loops, CLECs cannot reserve any particular loop.

As an example, Verizon Technical Specification describes its “Unbundled Digital Loop” offering. In Section 4, Service Specifications, Verizon details the various tests it runs on loops prior to provisioning them as “Unbundled Digital Loops”:

Figure 4-17: 2WDA-C Acceptance Limits (AL) and Immediate Action Limits (IAL)

Parameter	AL	IAL
Foreign Voltage*	≤ 1 volt	> 1 volt
Insulation Resistance	≥ 300 kilohms	< 120 kilohms
Loop Resistance	≤ 1000 ohms	> 1000 ohms
1004 Hz loss **	≤ 6.0 dB	> 6.5 dB
196 kHz Loss @ 135 ohms	≤ 53 dB	> 53 dB
C-Message Noise**	≤ 30 dBrnC	> 30 dBrnC
Wideband Noise (50 kb filter)	≤ 28 dBrn	> 28 dBrn
Impulse Noise	≤ 7 counts in 15 minutes with 44 dBrn threshold	> 7 counts in 15 minutes with 44 dBrn threshold
Power Influence	≤ 90 dBrnC	> 90 dBrnC

* Foreign voltage must be measured with a high impedance voltmeter or erroneous readings may result. Tip-to-ring voltages must be ≤ 1 Vdc and ≤ 1 Vac. Tip-to-ground and ring-to-ground voltages must be ≤ 1 Vdc and ≤ 50 Vac

** Voice band parameters do not apply to non-POTS applications.

As Verizon is able to perform these tests in provisioning its unbundled digital loops, such testing is technically feasible⁴ and Qwest could do so as well. Qwest, however, has not committed to testing for, e.g., wideband noise or impulse noise for ADSL.

For all of these reasons, Integra objects to the following proposed language (with the new Qwest language shown in underlining):

Service requests can be rejected for various reasons including not meeting the performance testing parameters specified in your ICA. In these instances, Qwest will place the order in jeopardy using the C31 jeopardy code and the standard jeopardy process will be followed. Error and rejection notifications are described in the Ordering Overview.

Qwest’s proposed insertions (shown in underlining) appear to increase the number of situations in which Qwest will reject CLEC orders (service requests) by depending exclusively on POTS metallic line test plus a 196 kHz Insertion Loss test parameters. This combination of tests does not assure that Qwest will deliver a loop capable of ADSL service, and it may disqualify loops that otherwise would be capable of supporting ADSL service. Qwest should be confirming in its PCAT Qwest’s obligation to perform the performance testing necessary to assure that the facility meets appropriate performance parameters for the xDSL technology ordered.

⁴ Technically Feasible is defined, for example, in Qwest’s own ICA negotiations template, as well as in Section 4.0 of the Qwest-Integra MN ICA and the Qwest-Eschelon ICAs in Arizona, Minnesota, Oregon, Utah and Washington.

On August 31, 2010, Qwest held an ad-hoc CMP call to discuss its response to CLEC written comments. Before the CMP call, Qwest revised its proposed changes to its PCAT. Qwest's revised changes verify Qwest's long-standing non-compliance with the law and the interconnection agreements. Specifically, the Qwest-prepared CMP meeting minutes of the August 31, 2010 ad-hoc CMP call show that Qwest admitted that Qwest had not been testing ADSL compatible loops to digital levels (196kHz).⁵ This confirms that, for years, Qwest has not been in compliance with the federal rule stating that ILECs, such as Qwest, may not restrict its testing of such conditioned copper loops to testing for voice transmission only.⁶ Qwest's CMP meeting minutes indicate: "We just started the test about 3 - 4 weeks ago."⁷

In a June 5, 2008 email, Qwest's Regional Vice President had said: "If Integra wishes to receive a signal that is tested at 196kHz, you would need to request an ADSL service or a DS1 capable loop."⁸ This statement suggested at the time that, although Qwest wrongly limited testing of conditioned copper loops for other types of xDSL (*e.g.*, HDSL), that it was at least Qwest's policy to test ADSL capable loops to digital (196kHz) levels. The information provided by Qwest during the recent CMP ad hoc call indicates that Qwest's policy included ADSL as well.⁹

Only after a state commission became involved and, in the Minnesota generic UNE Provisioning proceeding, established a schedule for the filing of testimony,¹⁰ did Qwest initiate this change to the ADSL PCAT to finally recognize the need to conduct at least some testing to digital levels.¹¹ Qwest did not do so until August 5, 2010 -- nearly three years after Integra called to Qwest's attention the need to test to digital parameters.¹² Qwest has also made no commitment in CMP as to how long the recent PCAT change would stay in place. Integra's ICA language was the same before and after Qwest's PCAT changes, which indicates that Qwest is making changes regardless of the terms of individual ICAs. What will prevent Qwest from simply reversing these changes?

⁵ One of the Qwest-proposed changes to its PCAT is to add digital (196kHz) testing for ADSL compatible loops.

⁶ "Insofar as it is technically feasible, the incumbent LEC shall test and report troubles for all the features, functions and capabilities of conditioned copper lines, and may not restrict its testing to voice transmission only." 47 C.F.R. §51.319(a)(1)(iii)(C).

⁷ See Qwest 8/31/10 CMP ad-hoc call meeting minutes.

⁸ See CR PC082808-1IGX detail.

⁹ After Qwest sent this email in 2008, Qwest unilaterally announced that, even when ADSL remains available (after Qwest grandparented ADSL), "ADSL service may be degraded or may not work at all." See Qwest's notice entitled PROS.03.13.09.F.06150.LoopQualCLECJobAid_V25.

¹⁰ Minnesota Docket No. P-421/CI-09-1066.

¹¹ Additional testing issues remain (*e.g.*, wide-band testing for wide-band technologies such as ADSL), and Joint CLECs have provided testimony about those issues in the Minnesota UNE Provisioning docket Minnesota Docket No. P-421/CI-09-1066.

¹² See BJJ-22 Summary of Key Events in Minnesota Docket No. P-421/CI-09-1066.

Because the above-quoted Qwest proposed PCAT changes have not been revised since Integra's August 18, 2010 Comments, the following Integra August 18, 2010 comments and objections continue to apply:

“Second Deletion and Second Proposed Insertion

Qwest proposes to delete the following language in the current PCAT:

Service requests can be rejected for various reasons. Error and rejection notifications are described in the Ordering Overview.

Qwest proposes to replace the above-quoted language with the following proposed language (with the new language shown in underlining):

Service requests can be rejected for various reasons including not meeting the performance testing parameters specified in your ICA. In these instances, Qwest will place the order in jeopardy using the C31 jeopardy code and the standard jeopardy process will be followed. Error and rejection notifications are described in the Ordering Overview.

Qwest's proposed insertions (shown in underlining) appear to increase the number or kind of situations in which Qwest will reject CLEC orders (service requests). Is this the Level 3 change in process? If so, please describe the additional or different situations in which Qwest will reject CLEC orders. If not, please identify and describe what change in process this language represents.

In Qwest's proposed PCAT changes, Qwest omits any mention of situations in which CLEC authorizing conditioning. If a CLEC authorizes conditioning, Qwest should condition the loop so that it meets the performance parameters required by the law. The FCC defines line conditioning as “the removal from a copper loop of any device that could diminish the capability of the loop to deliver xDSL. Such devices include bridge taps, load coils, low pass filters, and range extenders.” 47 C.F.R. §51.319(a)(1)(iii)(A). As there is no exception in Qwest's proposed language for line conditioning, it appears that Qwest will reject orders regardless of line conditioning. Is that Qwest's intent? If not, how will Qwest modify its proposed language?

Please explain the reference to the jeopardy code of C31. Did Qwest consider any other codes? The “C” in the code indicates that Qwest intends to code all of these rejections as CLEC-caused issues. How does Qwest know that in advance? Qwest's language is under the Provisioning and Installation heading. Qwest needs to deliver and install a working ADSL compatible loop capable of carrying digital signals. If the reason that a loop does not meet performance testing parameters is in Qwest network (such as bridge tap meeting the FCC definition), why would the code of C31 apply? Please explain.”