Forums Held December 1-3, 2003
December 12, 2003
December 19, 2003
January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

FINAL BATCH HOT CUT PROCESS FORUM ISSUES MATRIX

UNRESOLVED ISSUES ONLY

PROCESS ISSUES - EFFICIENCY					
ISSUE #	ISSUE DESCRIPTION	QWEST POSITION	CLEC POSITIONS	HISTORY	RESOLUTION/RATIONALE
P-3 See also P-23 & P-24	Can CLECs request batch cuts at any time of day?	The Batch Hot Cut Proposal is designed for Basic Installation option only Those types of sensitive circuits that require that planning need to be run through the standard hot cut process. 12/10/2003: Qwest has committed to notify the CLEC on due-date via e-mail when the batch cut begins. Batches will be completed within a relatively short period of time; therefore a coordinated installation such as is contemplated by this question is not necessary. 1/6/2004 – The Batch Hot Cuts will be done during a 3:00 a.m. to 11:00 a.m. window.	CLECs should be able to request batch cuts on any day, at any time of day. (AT&T – p. 19); 1/6/2004 – AT&T continues to want the ability to identify a specific window of time during the day in which Batch Hot Cuts are performed and does not want to be limited to the 3-11 window currently provided by Qwest's process. 1/6/2004 - AT&T will take the Trap and Trace proposal back to its operational people and will get back to Qwest on whether or not it will close the issue of method of notice of commencement/completion of the batch/ status of batch. 1/6/2004 – McLeod will take the Trap and Trace proposal back to its	12/12/2003: Request from MCI: When MCI goes into the negotiation process, can it provide a notification e-mail address at that time? QWEST RESPONSE: prior to the time a CLEC submits a batch hot cut _for the first time_, the CLEC will provide a notification e-mail address to Qwest. That e-mail will then be used by Qwest to notify the CLEC that a batch hot cut has begun for all batch hot cuts for that CLEC. CLECs do not have to include the e-mail address on LSRs. How will Qwest make sure it uses the provided e-mail for batches and other e-mail addresses for other types of order activity. QWEST to respond in writing. 12/17/2003: Qwest written response: The CLEC will provide the email address for their BHC-	1/6/2004 – IMPASSE as to AT&T regarding ability to identify a specific window of time during the day in which Batch Hot Cuts are performed. AT&T does not want to be limited to the 3-11 window currently provided in Qwest's process. 1/7/2004 – IMPASSE as to AT&T issue of whether or not the web-based status tool is the appropriate method of communication between Qwest and the CLECs on order status (See Related Issues P-23 & 24) 1/7/2004 IMPASSE as to McLeod on issue of whether or not the web-based status tool and the Trap and Trace capability is the appropriate method of communications between Qwest

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		1/6/2004 – MODIFICATION TO ORIGINAL PROPOSAL - Qwest will notify the CLECs when the batch has started via the new web-based status tool. The Trap and Trace option will also identify when the batch begins. 1/6/2004 - Qwest will submit a change request to Change Management as soon as it has fully defined the requirements for the status tool. There are clarification meetings that are held to accommodate CLEC input prior to submitting the CR.	operational people and will get back to Qwest on whether or not it will close the issue of notice of commencement/completion of the batch/status of batch. CLECs may need to plan certain batch hot cuts for customers with alarm circuits or CPE (Eschelon – p. 13)	ZCID project. The QCCC will build a table unique to the Batch process with the BHC-ZCID and designated email. Therefore,, this email address will be dedicated only to these orders. 1/6/2004 – IMPASSE PENDING on e-mail notification issue as to AT&T and McLeod – both companies taking back issue of status tool and Trap and Trace as notification vehicles in lieu of e-mail or other "push" technology.	and the CLEC on order status. (See Related Issues P-23 & 24) IMPASSE as to Eschelon Request - regarding designating a time for customers with CPE or alarm circuits being something less than coordination that could be accommodated by the Batch Hot Cut process. 1/6/2004 – MCI agrees issue regarding e-mail notification can be CLOSED.
P-5	Whether the Batch Hot Cut process should include loops provisioned over IDLC.	IDLC loops are handled using the standard hot cut process. Orders that are provided over IDLC are C-Jeop'd back to the CLEC if those orders are included in the Batch. To include these types of orders in a Batch eliminates the efficiencies the Batch process was designed to provide (due to requirement to roll a truck)	IDLC should be included in the hot cut process. (AT&T – p. 16-19); (MCI – p. 4); (Eschelon – p. 15); (McLeod at 1) MCI would propose building a look-up table in Qwest OSS and reject those orders when they are submitted and providing information regarding IDLC and RT location. (MCI – Forum) AT&T proposal – AT&T is not proposing that IDLC be a part of	IMPASSE - as to including IDLC loops in the batch - MCI (but MCI will consider Qwest's proposal to provide the IDLC information in advance of requirement to transition) 12/12/2003 – Remains at IMPASSE IMPASSE - as to action to be taken when loops submitted by the CLECs are provisioned over IDLC – should those orders automatically move to standard hot cut or should the order be c-jeop'd back to the CLEC by	12/12/2003 - IMPASSE - as to including IDLC loops in the batch - MCI 12/12/2003 - IMPASSE - as to action to be taken when loops submitted by the CLECs are provisioned over IDLC – automatic move to standard hot cut or c-jeop of the order by Qwest CLOSED– 12/10/2003: as to the

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Forums Held December 1-3, 2003
December 12, 2003
December 19, 2003
January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

		Qwest will convert 10 UNE-Ps that are provisioned over IDLC loops per day per Remote Terminal within a Qwest Network Manager's area. Qwest will provide CLECs with an electronic spreadsheet of all CLEC customers, by central office, that are served via IDLC. Timing – for those markets where there is a finding of "no impairment," the spreadsheet will be provided to CLECs prior to the time when they must transition their lines. Response to AT&T proposal – to handle in that manner, requires manual intervention and additional steps that impact efficiencies the Batch Hot Cut was designed to provide.	the batch – what they are proposing is that when CLECs send over UNE-P's for conversion that Qwest identify whether the service is provided over IDLC, have those orders drop out of the Batch and automatically convert them under the standard hot cut process. If IDLC results in delay of customer migration to UNE-Loop, will Qwest continue to charge UNE-P rates until that customer can be migrated? (Gates – MCI – Forum)	Qwest CLOSED– 12/10/2003: CLEC would be billed the UNE-P rate until the completion and acceptance of then UNE-Loop service conversion.	MCI question regarding what rates would apply pending migration of the CLEC to UNE-Loop.
P-6a	Whether the Batch Hot Cut process should include line split loops.	Line split loops are not included in the batch process, rather they are handled using the standard provisioning process.	Line splitting should be included in the hot cut process. (AT&T – p. 16-19); (MCI – p. 8-9); (Eschelon – p. 15); (Covad – p. 4);	12/3/2003 - OPEN – Qwest and Covad will meet to create a diagram depicting the various network connections required in a Line Splitting/Loop Splitting arrangement. – Diagrams completed – see BHC Forum Exhibit 4	12/12/2003 IMPASSE as to both P-6a and P-6b– for MCI, Covad, Eschelon & AT&T
P-6b	Whether the Batch Hot Cut process should include UNE-P	Requires changing the service from a non-design service to a design service – thereby	Covad agrees that this issue applies for the embedded base only and does not apply for new line		

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December 12, 2003
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	with ancillary DSL.	eliminating some of the efficiencies the Batch process was designed to provide.	splitting/loop splitting orders (Covad – Forum)		
P-8	Whether the Batch Hot Cut process applies if an outside technician dispatch is required.	The Batch Hot Cut Process is limited to use of existing facilities that do not require an outside technician dispatch.

It is Qwest's position that the efficiencies gained in the batch hot cut process would be lost if outside technician dispatch is required. | If the assumption that the batch process will be limited in every case to situations that do not require an outside technician dispatch, this is still an open issue for Eschelon | 12/3/2003 OPEN – Eschelon will consider whether they will continue to pursue this position in light of discussion at 12/2/2003 meeting of the Forum. Eschelon will provide feedback at the next meeting of the Forum. | 12/12/2003 – IMPASSE for Eschelon as to the issue of including in the batch those orders that require an outside technician dispatch. |
| P-10 (See also P-1) | Order placement methods, flow-through and service order accuracy | CLECs submit their orders for a Batch Hot Cut using the existing LSR process, with the "BHC" plus CLEC ZCID project number, whether that is through the GUI or EDI interface.

Qwest response to sub-issues in CLEC Position Column:

1. CLECs can use either EDI or GUI to submit batch hot cut orders.

2. CLECs will not be required to manually generate spreadsheets

3. Batch Hot Cut Orders are | 1, CLECs should be able to use either EDI or GUI to submit orders. 2, CLECs should not be required to manually generate spreadsheets. 3, Orders should flow through. (MCI-p. 5 & 9); (McLeod at 2)

4. Efficient submission will likely require development of new ordering capabilities – sending individual LSRs for multiple orders should not be considered a "batch." . (Eschelon p. 12) Clarification by Eschelon - Eschelon would like Qwest to put in place an interface to the GUI and EDI for Batch Hot Cuts that would take the place of LSR-by- | MCI agrees to close as to the first 3 sub-issues (in CLEC Position column)

McLeod agrees to close the first 3 sub-issues pending discussion of scalability issue.

12/3/2003 - On Sub-Issue 4 - Eschelon will take back and determine if it will continue to pursue asking for an alternative to submitting individual LSRs e.g., spreadsheet functionality.

12/12/2003 - Given discussion at last Forum, Qwest position is that | 12/12/2003 - MCI agrees to close as to the first 3 sub-issues (in CLEC Position column)

12/12/2003 - McLeod agrees to close the first 3 sub-issues pending discussion of scalability issue.

12/12/2003:   IMPASSE as to ESCHELON issue (#4) – regarding alternative to submitting individual LSRs e.g., spreadsheet functionality. |

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    December 12, 2003
    December 19, 2003
    January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

		flow-through eligible. Batch Hot Cut LSRs will flow-through in accordance with existing flow-through standards. **4.** The LSR process is appropriate for use with the Batch Hot Cut process. Because of quality and cost issues, Qwest will not pursue development of an interface.	LSR entry. Or, in the alternative, give CLECs the capability of sending an electronic spreadsheet directly to the QCCC. (Eschelon – Forum)	taking a mechanized process and taking a step backward to a manual spreadsheet or to re-mechanize in another fashion is not something Qwest is willing to make a part of the Batch Hot Cut Process.	
P-11	Order in which lines are cut over	To achieve efficiencies, the process does not permit CLECs to determine the order in which lines are cut over.	CLECs should be able to specify the order in which lines are cut over e.g., customers with multiple CSRs (Eschelon – p. 13 MN p 9)	12/3/2003 - OPEN - Eschelon will take back to determine if they are going to continue to pursue this capability. 12/12/2003 - Eschelon continues to request this capability. Because CLECs must use the related PON process to submit such LSRs, Qwest should develop a spreadsheet for the batch so that related PONs are worked consecutively. Eschelon believes a PON format could be developed to indicate sequence for this purpose. 12/12/2003 - the efficiencies gained in the Batch Hot Cut Process include permitting the central office	12/12/2003: IMPASSE as to Eschelon issue regarding CLEC ability to determine the order in which lines are cut over in the batch.

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Forums Held December 1-3, 2003
    December 12, 2003
    December 19, 2003
    January 6-9, 2004

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Docket No. UT-033044
January 23, 2004

				technician to perform work in the most efficient and effective way possible; specifying the order in which lines are cut over, when those lines may be on multiple blocks on the frame, reduces the efficiencies of the process.	
P-12	Impact on Batch Hot Cut Process of migration by telephone number change request	The "migrate by TN" capability covered by CMP CRs SCR061302-01 and SCR022703-18 address only orders where the "to" product is UNE-P.	Batch Hot Cut process should allow CLECs to "migrate by telephone number." (MCI – p. 10) MCI views this as a critical requirement (MCI – Forum)	12/3/2003 - OPEN – pending Qwest take back on technical capability issues associated with making TN migration capability available for batch hot cuts. 12/10/2003 Qwest Response: There is no technical limitation precluding Qwest from modifying the edits in IMA to allow CLECs to enter TN and SANO for UNE-P to UNE-Loop conversions. Systems changes to accomplish this modification are required to go through Change Management. MCI submitted a CMP CR (SCR120403-01) requesting this change on December 4, 2003. There is, however, a technical limitation that would prevent migration by TN from UNE-Loop to UNE-Loop as in that instance, the TN does not reside in Qwest	1/6/2004 – IMPASSE as to MCI issue of not providing CLECs with the capability, in the Batch Hot Cut process, to "migrate by telephone number and SANO"

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Forums Held December 1-3, 2003
December 12, 2003
December 19, 2003
January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

			databases. 12/12/2003: Further Qwest response: This CR would be eligible for inclusion in IMA Release 16.0 which is tentatively scheduled for August 2004. To have it declared as a *regulatory* CR, requesting party must provide the docket number and verbiage from the regulatory order in that docket that mandates the activity. QWEST WILL TAKE BACK the questions of whether or not it considers this a regulatory mandate? If so, would Qwest oppose the change? Is it an option for the CR to be escalated in its implementation to a release sooner than IMA 16.0 via the CMP exception process? 1/6/2004 – As to MCI's question about whether Qwest will support or oppose the "migrate by TN" CR as a regulatory change – Qwest will embrace the spirit of a Commission order that may, at the end of the 9 month proceeding, direct such a change –it cannot support "migrate by TN" as a *regulatory* change because in order to be a *regulatory*	

1/9/2004

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December 12, 2003
December 19, 2003
January 6-9, 2004

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Docket No. UT-033044
January 23, 2004

			change, the requirement must have a docket number **and** order associated with it. Qwest is not including the "migrate by TN" in its current Batch Hot Cut proposal because it is not a capability that is specific to batch hot cuts. However, Qwest will not oppose the MCI CR SCR061302-01 and SCR022703-18 (that deal with the TN SANO capability generally) in the CMP .	
21c	What happens when there is an error in the Qwest database, then how does Qwest handle the situation and what ability does the CLEC have to get the batch through?		What if CLEC has done the checks into the RLDT or other tools and yet their order becomes jeopardized because IDLC is present, but wasn't noted in the database? (Eschelon – Forum) 12/12/2003: MCI question - How does the Raw Loop Data Tool get updated?	12/10/2003: The jeopardized order would not be processed as a part of the batch. However, Qwest has modified its position to allow for the remainder of qualified lines in the batch to continue to be processed so long as at least 20 lines remain in the batch. While IDLC information is available in the RLDT, in some rare instances, the IDLC may not appear in the RLDT. If the information is missing, the CLEC has the capability of notifying Qwest of the missing information via the RLDT. 12/12/2003 - IMPASSE for Eschelon– as to handling of orders that are jeopardized as a result of inaccurate or incomplete information in the Qwest database.	12/12/2003 – Eschelon IMPASSE on 21c– as to handling of orders that are jeopardized as a result of inaccurate or incomplete information in the Qwest database. 12/12/2003 - CLOSED as to MCI question–The RLDT regularly dips into LFACs and gets updates. If a manual look up is requested by the CLECs, then LFACs, and consequently, RLDT, are updated with information discovered in the manual look-up. Qwest would update the systems automatically; the CLEC does not have to take further action to affect the updates.

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December 12, 2003
December 19, 2003
January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

P-23 (See also P-3 and P-24 and S-1)	Timing for notifying CLECs when a batch is completed Method of notice to CLECs	Qwest proposes to notify the CLECs when all lines in the batch have been completed and will do so via an electronic spreadsheet. In addition, Qwest currently sends FOCs and SOCs to CLECs electronically. Further, Qwest changes the status within EDI within one (1) hour of completion of the service order activities to identify that LSR requests are completed. Qwest will also notify the CLECs when the batch has started via the **new web-based status tool**. The Trap and Trace option will also identify when the batch begins. 1/6/2004 - Qwest will submit a change request to Change Management as soon as it has fully defined the requirements for the status tool. There are clarification meetings that are held to accommodate CLEC input prior to submitting the CR.	Notification upon completion of the entire should occur prior to completion of the entire batch (AT&T – p. 7) Completion of a cut should trigger an electronic SOC within 10 minutes of the cut. Qwest must send EDI provisioning and completion notifications to close out the LSR. (MCI – p. 13) Batch Hot Cut process should not result in all-day hot cuts (Eschelon – p. 17)	12/3/2003 OPEN – 1/7/2004 – MCI would like Qwest to take back the suggestion of having the Status Tool perform updates more frequently than 30 minutes.	1/7/2004 – IMPASSE as to timing and method of notice to CLEC of batch completion
P-24	How will CLECs	Qwest proposes to notify the	The CLEC needs accurate	1/6/2004 – Today, this would be	1/7/2004 – IMPASSE as to the

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December 12, 2003
December 19, 2003
January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

(See also P-3 & P-23)	know which orders in the batch were completed?	CLECs when all lines in the batch have been completed and will do so via an electronic spreadsheet. In addition, Qwest currently sends FOCs and SOCs to CLECs electronically. Further, Qwest changes the status within EDI within one (1) hour of completion of the service order activities to identify that LSR requests are completed. 1/6/2004 - Qwest will also notify the CLECs when the batch has started via the status tool. The Trap and Trace option will also identify when the batch begins. 1/6/2004 - Qwest will submit a change request to Change Management as soon as it has fully defined the requirements for the status tool. There are clarification meetings that are held to accommodate CLEC input prior to submitting the CR	information regarding the exact lines that were cut over. (AT&T – p. 11)	IMPASSE for AT&T as to existing proposal that has CLECs pulling information from Qwest as opposed to the information being pushed to the CLEC by Qwest. The issues are (1) notification via the website when there is a no dial tone issue discovered by Qwest and (2) notification via the website of the initiation and completion of the batch. 1/7/2004 – MCI supports the web-based system proposal, particularly if it can use it in conjunction with Trap and Trace. MCI looks forward to working with Qwest on the requirements document associated with the proposed status tool as part of the clarification meetings provided for in CMP. MCI believes the status tool needs to be developed as an "API" so that information can be shared back and forth. 1/7/2004 – AT&T does not want to commit at this time to a "pull" solution as Qwest currently proposes and preclude some sort of "push" technology such as some sort of EDI message or something through the IMA GUI.	issue of whether a web-based status tool is sufficient to provide information to the CLECs on status or is an e-mail or other type of "push" technology appropriate.

1/9/2004

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     December 19, 2003
     January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

				1/7/2004 – McLeod would like Qwest to take the issue back of enhancing EDI to provide for capability to notify CLECs when a batch begins in addition to the status information already provided via EDI. 1/7/2004 - Qwest response is that it has already explored enhancing EDI and found that the update intervals associated with updating status in EDI would likely be longer than those associated with Qwest's web-based status tool proposal. 1/7/2004 – McLeod will continue to evaluate the Trap and Trace option. McLeod position is that the web-based status tool is, in large part, a duplication of information that CLECs obtain today via EDI (with the exception of the jeopardy notices)	
P-27c	Level of mechanization – automated or robotic frames	According to the International Engineering Consortium (IEC) on URL: http://www.iec.org/online/tutorials/frames/topic04.html There is no viable solution for	Automated or robotic frames should be evaluated (MCI – p. 3)	On the issue of automated or robotic frames – see information in Qwest Position column.	12/19/2003 – IMPASSE as to the issue of evaluating automated or robotic frames.

1/9/2004
     11

Forums Held December 1-3, 2003
    December 12, 2003
    December 19, 2003
    January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

		robotic distribution frames at this time.. "While simple in concept, this type of solution never quite matured into a viable technology for automating distribution frames. That is because pure mechanical, robotic solutions have reliability and maintenance issues due to their moving parts. This limits their effectiveness in larger COs or in environments where significant churn is experienced." "Perhaps the biggest "show stopper" for robotics, and all of the other copper automation technologies previously examined for frame applications, has been scalability."			
P-29	Coordination of systems changes as a result of the Forum & State proceedings with CMP	For systems changes, the product of the Forum and the State Proceedings will go to CMP as Regulatory Change Requests. As such, the changes will be incorporated into releases above the line and will not be prioritized.	How will changes agreed to in the Forum be synched up with and incorporated into the CMP? (Lichtenberg – MCI – Forum)	12/10/2003 – OPEN 12/19/2003 - Qwest provided explanation that the CMP process for regulatory changes is for all CLECs and Qwest to vote to see if they agree that the systems changes are indeed a regulatory change. Qwest will agree to abide by the spirit and intent of the regulatory orders issued by state Commissions and the existing CMP processes as	1/7/2004 – IMPASSE – as to MCI issue regarding the need for any system changes coming out of the batch hot cut proceedings in the states to be classified as regulatory changes. MCI does not agree, in this situation, that the CMP process is the appropriate forum to address systems changes associated with Batch Hot Cut given that the

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Docket No. UT-033044
January 23, 2004

				they pertain to the Batch Hot Cut process. MCI believes this issue needs to remain OPEN. 1/7/2004 – Qwest proposes that this issue be resolved by stating that changes agreed to in this forum **and** ordered by state commissions will be incorporated into the CMP process as regulatory changes. 1/8/2004 – McLeod concerned about system enhancements for BHC being included in the CMP given the number of Change Requests that are currently pending – McLeod position is that the enhancements associated with BHC should be moved outside CMP as a separate release. 1/8/2004 – Covad recommends Qwest allocate additional resources to address systems issues associated with Triennial Review. 1/8/2004 – It is Qwest's position that the changes that result from the TRO will be handled through the normal CMP process..	systems changes must be in place in order for the Batch Hot Cut process to exist.
			SCALABILITY – VOLUMES		
SC-1 (See	Can Qwest's	The Batch Hot Cut process is	Qwest needs to provide more	12/3/2003 OPEN - For SC-1 in total,	1/7/2004 – IMPASSE as to

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     December 12, 2003   Docket No. UT-033044
     December 19, 2003   January 23, 2004
     January 6-9, 2004

also SC-5)	proposed process handle anticipated volumes?	scalable, which will allow Qwest to meet current and future demand. In considering volumes that may have to be handled by the Batch Hot Cut Process, Qwest has considered the embedded base as well as incremental growth similar to what AT&T has suggested. An additional assumption is that in the event there is a finding by state commissions of impairment,, or in markets where Qwest does not seek to challenge the presumption of impairment, then Qwest will continue to provide UNE-P. All of these assumptions will form the basis for the volumes that can be anticipated. Qwest will be prepared in the near future to put forward numbers based on those assumptions.	evidence to establish this point. (AT&T – p. 12) Qwest needs to identify the number of batches that it can handle per Central Office, per state and per region. (Eschelon – p. 17) Qwest must clarify the maximum/minimum line volumes per day per CLEC for the Batch Hot Cut (McLeod – p. 1) The daily line count threshold that Qwest can manage for its retail unit must be provided, and parity established. (McLeod – p. 2) Are there limitations on the number of UNE-P to UNE-L lines that can be migrated for a single account? (MCI – Forum) Clarify the relationship of and impact of batch process on non-batch orders and other services. (Eschelon MN p. 10) AT&T believes should assume worst case scenario for development of the process upper limit. AT&T thinks that adding an	Qwest will take-back – providing parties with the assumptions that form the basis for its proposed volume estimates. Qwest will also provide additional information on assumptions for staffing levels for the anticipated volumes. Qwest is not placing limits on the number of UNE-P lines that can be migrated for a single account.	whether Qwest's proposed process can handle anticipated volumes

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Forums Held December 1-3, 2003
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    January 6-9, 2004

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Docket No. UT-033044
January 23, 2004

			incremental growth number using analogous number e.g., customers will move their local service about as much as they move their long distance service approximately 2.6%. Churn for CLECs is approximately 4.6-5.2% Churn rate should also include winback rates for Qwest. AT&T concerned about Qwest's ability to handle volumes. Wants Qwest to share some of its analysis on why it believes it can keep up with the demand AT&T believes its appropriate to look at embedded base of UNE-P and UNE-L customers, add some incremental growth number to account for the churn, include additional staff to handle IDLC, and then explain how the process will handle. (AT&T – Forum) Scalability is an issue for McLeod and very interested in how Qwest will gear up for the volume. (McLeod – Forum)		
SC-5 (See also SC-1)	Staffing levels	Resources will be added and/or shifted as the final Batch Hot Cut process requires. Qwest will use its standard recruiting, hiring and training practices to staff the	Describe the number of additional people Qwest must add to meet the increased hot cut demand. (AT&T p. 13)	12/3/2003 OPEN – See also SC-1	1/7/2004 – IMPASSE as to level of detail required regarding plans for staffing by Qwest to address batch hot cut activity

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Forums Held December 1-3, 2003
December 12, 2003
December 19, 2003
January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

		work activities required. In those locations where Qwest has sufficient volumes, there will be dedicated personnel assigned to batch activities. For other locations, the staff will not be dedicated only to batch work, but during batch activity, will be focused on that work.	Plans for recruiting, hiring and training personnel (AT&T p. 14) Qwest must identify and dedicate Qwest personnel to the Batch Hot Cut process (Eschelon – p. 15) By dedicated, Eschelon means resources that will be working solely on batches.		
VOLUMES					
V-2	Per Central Office limit on Batch Hot Cuts	Qwest proposes a limit of 100 lines per Central office	What is the appropriate limit on a per central office basis – should there be a limit? (Eschelon – Forum)	12/3/2003 - OPEN 1/8/2004 – Qwest position is that the most efficient configuration is for 2 technicians performing 100 conversions during an 8-hour shift . 1/8/2004 – AT&T – accepting that premise – is there a reason why you have to limit it to two technicians? Qwest Response: two technicians is optimum given the concentration of wires on the frames where this work is being performed and is the most efficient way. Further, the 100 lines per CO permits Qwest to complete the migration well within the transition period. 1/8/2004 – If, in the transition meetings, MCI or other CLECs want a more rapid	1/8/2004 - MCI would agree to CLOSE this issue based on an agreement that the parties are not foreclosed from mutually agreeing, during the transition planning process for the embedded base, to the possibility of doing more than 100 lines per CO on an exception basis, Further, planning can include new customers may also be included in the batch. 1/8/2004 – McLeod will go to **IMPASSE** at this time on the sizing limitation of the number of batch hot cut

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Forums Held December 1-3, 2003
    December 12, 2003
    December 19, 2003
    January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

| | | | | transition in certain central offices that met certain characteristics, would Qwest be willing to do more than 100 lines?

1/8/2004 - Qwest is not precluding that sort of discussion, however, the volumes appear to demonstrate that Qwest can handle the transition in addition to day-to-day activity within the 100 line per CO limit. | lines included in a batch per central office. McLeod suggests we take a look at the resources available in a CO and proposes a 200 lines per CO limit.

1/8/2004- Covad agrees to CLOSE this issue based on an agreement that the parties are not foreclosed from mutually agreeing, during the transition planning process for the embedded base, to the possibility of doing more than 100 lines per CO on an exception basis. Further, planning process may also include consideration of new acquisition customers.

1/8/2004 – AT&T will take this issue to **IMPASSE** and supports McLeod's suggestion that the batch size per Central Office of 200 lines. |
| V-3 | Size of a "batch" | The batch must include at least 25 lines for a specific CLEC in one central office. | CLECs should be allowed to determine a minimum or maximum amount of orders to send per batch, per CO. (MCI – p.7) | 12/3/2003 - OPEN | 1/8/2004 – IMPASSE as to the issue of minimum batch size |

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Forums Held December 1-3, 2003
December 12, 2003
December 19, 2003
January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

			Qwest should specify the assumptions and exceptions made per batch. (Types of orders, volume limits, etc) (McLeod – p. 1) Clarify definition of batch/number of lines. (Eschelon – Forum) How many current orders would trigger the "batch" process as defined in the proposal. In other words, how often does a single CLEC submit orders for 25 mass market loops in a single wire center on a single day? Single week? What percentage of the offices in the state incur this type of volume? (Peter Healy TDS Metrocom – Forum) 12/19/2003 – MCI response – MCI position is that limit of 100 per	12/10/2003 - Qwest does not currently track orders in this manner, and has no way of tracking this information since CLECs do not currently "batch" their orders for submission, except where they desire conversion on a project-managed basis. 12/12/2003 –Qwest has UNE-P arrangements in 91% of the central offices in its territory. In a large percentage of those offices there are 25 or more UNE-P arrangements. **Qwest will take back** question of what is that percentage. 12/19/2003 – generic example in a state with 130 offices, 75 have UNE-P in them; of that 75, less than 25% of them have fewer than 25 UNE-P arrangements, 6 offices have 1,000 or more. Qwest will provide more detail at the January forum.	1/8/2004 – McLeod position is that, particularly for new customers, there should be no minimum number necessary for CLECs to be able to take advantage of batch hot cuts and a cheaper price. 1/8/2004 – AT&T position is that 25 should not be the minimum batch size. AT&T proposes there be no minimum batch size 1/8/2004 – MCI position is there should be no minimum batch size per CLEC or generally

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Forums Held December 1-3, 2003
   December 12, 2003
   December 19, 2003
   January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

			CLEC per CO is the *minimum* limit.	Steve Pitterle - from TDS Metrocom has additional questions before agreeing to close. 12/19/2003 –looking for response from Qwest regarding the percentage requested above. MCI is not willing to agree to close at this time. MCI is not willing to say that the appropriate maximum number of lines per CO is 100 unless there is some actual, technical explanation as to why there is a limit. MCI will take back the question of what MCI's proposed minimum/maximum numbers are for this purpose. McLeod will take back the question of what McLeod's proposed minimum/maximum numbers are for this purpose. Qwest will take back the request for additional support behind Qwest's 100 batch limit *and* the CLEC proposal to require less than a 25 minimum number as it pertains to unstaffed offices	
			SEAMLESSNESS		
S-2	Interval for the batch – from CLEC initiation of a	Intervals for the embedded base of UNE-P depends on the Batch Hot Cut process agreed to in the	a. Batch Hot Cut intervals cannot be individually negotiated on a project-by-project basis. There	**As to Sub-Issue S-2a** (as noted in CLEC position column): 12/3/2003 - OPEN - Qwest will take back	1/8/2004 – IMPASSE as to the issue S-2a - parameters for the interval - should the

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Forums Held December 1-3, 2003
December 12, 2003
December 19, 2003
January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

request to due date for the batch	Forum and the transition plans ordered by the Commission. For new Batch Hot Cuts, the interval will be negotiated.	must be a standard interval (e.g., 6 days). (AT&T – p. 14) a. CLECs should not be required to "negotiate" the provisioning date for a Batch Hot Cut in advance. Interval should be five (5) business days to minimize the amount of time a customer is held in a limbo state. (MCI – p. 5, 6 & 11) a. Assumption is that the current 5-day interval will be the interval for the new Batch Hot Cut process (McLeod – pp. 1 &2) a. Eschelon wants definition on what the interval is for the batch hot cut process. For new hot cuts, a standard interval critical. (Eschelon – Forum) b. AT&T wants to "get out of the negotiation business." For transition of the embedded base AT&T suggests scheduling it out every day for weeks at a time. If it is done that way, and Qwest has all the "CLEC balls in the air" and is scheduling the work accordingly, is there still a need for negotiation?	– parameters for an interval and also whether or not there is a way to schedule without requiring negotiations 1/8/2004 – Qwest position is that the "meaningful opportunity to compete" standard as decided in the 271 proceedings should be the basis on which intervals are set. For Batch cuts for the embedded base, the volumes involved and the fact that CLECs already have the customer so there is not a customer acquisition issue, the 7-day interval is appropriate and meets the "meaningful opportunity to compete standard." 1/8/2004 – AT&T wants interval for the Batch process to be same as for the one-by-one hot cuts (5 business days). With no minimum batch size, this is consistent. Conditional upon cost. 1/8/2004 – McLeod position is that a 4-5 business day interval is appropriate. CLECs have committed to have their translations complete on Day 1 and McLeod would commit to have any defective CFAs supplemented by Day 3. Interval is conditional upon cost. 1/8/2004 – Covad is not prepared at this time to specify an interval – tentatively 6	intervals for the batch hot cut process be the same as the intervals for the standard provisioning process? 1/8/2004 – CLOSED as to Issue S-2b – based on Qwest commitment to a scheduling tool. AT&T, MCI, McLeod, Covad agree to close. 1/8/2004 – S-2c – IMPASSE – as to the issue of a different batch interval for new customers vs. embedded base customers 1/8/2004 – S-2d – CLOSED 1/8/2004 – S-2e CLOSED

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Forums Held December 1-3, 2003
December 12, 2003
December 19, 2003
January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

			(AT&T – Forum) b. Rather than make negotiation the rule, may be easier to have negotiation as the exception for both the embedded base and "new" customers. (AT&T – Forum) c. For CLEC new acquisition customers coming from Qwest to the CLEC, today on average for a residential customer McLeod can convert to McLeod service in 7-8 calendar days, primarily because of the 5 day Qwest interval for the UNE-Loop. Concern about whether the batch hot cut process is even a viable option for "new" customers. (McLeod – Forum) d. MCI wants a timeline containing the intervals and what happens when. (MCI – Forum) e. MCI also wants Qwest to consider development of a scheduling tool. (MCI – Forum)	days. Interval is conditional upon cost 1/8/2004 – MCI position is that 5 business day interval is appropriate. MCI would also agree to have any defective CFAs supplemented by Day 3. Interval is conditional upon cost **Sub-Issue S-2c** 12/12/2003 Qwest will take back issue of whether there could be a different interval for "new customers" vs. embedded base. 1/8/2004 – Qwest is not willing to have a different interval for "new customers" vs. embedded base.	
			RATES/PRICE		
R -1 (See also R-2)	Rate structure for new batch process and timing for	The final Batch Hot Cut process must be defined before Qwest can create an appropriate cost	Detailed rate information needs to be provided including the cost structure and cost studies used to	12/3/2003 OPEN 1/8/2004 – Given the changes made to the	1/8/2004 – See also R-2 – IMPASSE as to what is the appropriate rate structure

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Forums Held December 1-3, 2003
　　December 12, 2003
　　December 19, 2003
　　January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

		study. The proposed Batch Hot Cut Process does not include costs associated with Coordinated Installation.	develop the rate (AT&T – p. 3); (MCI – p. 3). Consideration of rates for coordinated installation. (Eschelon –p.11) What are the benefits of the new process? How are efficiencies quantified in Qwest's proposed process (AT&T & MCI - Forum)	process during the Forum – Qwest will need to incorporate the changes into its cost studies for the process as it now stands. Qwest plans on filing a cost study with its testimony based on Qwest's proposal as it exists today along with a recommended price based on that study.	
R-2 (See also R-1)	What is the appropriate TELRIC-based price for the Batch Hot Cut process?	The NRC for the Batch Hot Cut process should reflect the forward-looking cost Qwest will actually incur to provide Batch Hot Cuts. The proposed process, as currently designed realizes efficiencies gained as a result of performing work in a batch manner.	Qwest needs to make significant reductions in its hot cut NRCs to make UNE-L a viable alternative for serving mass market (AT&T - p. 4) Qwest must specifically quantify all proposed NRCs involved in the Batch Hot Cut process. (McLeod – p. 1)	12/3/2003 OPEN – 1/8/2004 – see discussion in "History Column for Issue R-1 above.	1/8/2004 – See also Issue R-1 – IMPASSE – as to what is the appropriate TELRIC-based rate.
			POST-CUT QUALITY		
			PROCESS TESTING/PERFORMANCE MEASURES		
T-1	Should Qwest provide some demonstrable method to show that the Batch Hot Cut process works.	No. There is no such requirement in the TRO. The State Commissions shall establish and implement a batch hot cut process by July, 2004. Development of a test and incorporating a test as AT&T envisions takes an extensive	Process must be thoroughly tested to guarantee operational readiness. (AT&T – p. 21) AT&T recommends that there be some sort of testing process that uses existing Qwest customers, subject to monitoring by the State Commissions. (AT&T)	12/3/2003 OPEN – OPEN - Qwest will take back – possibility of proposing some demonstrable vehicle/evidence to show that the process works. 12/19/2003 – Closed as to Rick Carter of the Oregon PUC question as to whether	1/8/2004 – IMPASSE as to the issue of whether there is a requirement for Qwest to provide demonstrable proof that its proposed Batch Hot Cut process works prior to state commission approval.

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Forums Held December 1-3, 2003
December 12, 2003
December 19, 2003
January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

		amount of time that the timeframes provided by the FCC do not provide.	The test would have Qwest become a CLEC in its own territory establish a collocation, insert the required equipment, backhaul to a second CO, where it would have the backhaul connected to the second switch. Test would use Qwest's existing retail customers, and would test the 911 process, the LNP process etc. As the test was performed, there could be independent observations by the State Staffs to see how Qwest is performing. (AT&T – Forum) Subject to further discussion, expect that it would provide 100 cuts per day for a series of days. (AT&T – Forum) Qwest would have to send orders to itself via the GUI. (AT&T – Forum) The test does not have to be set up and completed prior to implementation of the process. The State Commissions can approve and implement the process and then perform the test. (AT&T	there a current work operation that could simulate a Batch Hot Cut that would illustrate Qwest's competency in this type of activity e.g., existing hot cut process bulk cuts to DLC etc. Qwest will take back – suggestions made by Don Gray from the Nebraska Commission and Rick Carter from the Oregon Commission regarding alternatives to testing e.g., PROCESS metrics 12/10/2003: Response to Don Gray (Nebraska Commission) suggestion regarding documentation of training and proficiency technicians and others involved in the batch hot cut process: Qwest is committed to training its affected workforce once the BHC process is finalized to ensure that technicians are proficient in the activities required by the process.	

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			– Forum) AT&T doesn't think the system or process will be the problem – the problem will be that you have a lot of human touch-points that create the opportunity for error. AT&T wants to see volumes of the level that could be expected with the process and some way to show that the process works under those volumes AT&T believes it is appropriate to test the actual process – once the process is developed – it should go through the test. As to the notion that there is something out there today that is a proxy – AT&T doesn't want to pursue that. Not suggesting that the testing has to be a part of any process proposal that the Commissions will approve – it can be done serially after the Commissions have issued their decisions. (AT&T 12/19/2003 Forum) Commercial testing must be an integral part of any approval process. (MCI – pp. 5 & 6)		

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    December 12, 2003
    December 19, 2003
    January 6-9, 2004

EXHIBIT NO. _____ (DP/LN-3)
Docket No. UT-033044
January 23, 2004

			MCI does not believe a third party test is required. There must be metrics put in place and the commercial operation with the ability to look at performance and with distinct performance metrics and remedies is the way to go. It is commercial day-to-day activity that is monitored and that there are sanctions/penalties for non-performance. (MCI – Forum) MCI concerned that the ancillary processes that surround the batch hot cut process can handle the volumes that a batch process may bring about. Not something within the control of Qwest, however, will be an issue that may directly impact customers. So MCI believes must work through the process, the process must be measurable and then see what happens in the commercial world once the process is implemented. If there are problems that are impacting end-user customers, there must be a way to stop the process until the issues are addressed. (MCI – Forum)		

1/9/2004

25

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Forums Held December 1-3, 2003   EXHIBIT NO. _____ (DP/LN-3)
    December 12, 2003   Docket No. UT-033044
    December 19, 2003   January 23, 2004
    January 6-9, 2004

			Process must be tested prior to implementation. (Eschelon – p. 16) Eschelon is interested in getting more information regarding AT&T's testing proposal using Qwest retail customers. (Eschelon – Forum) Qwest should be required to test any proposed Batch Hot Cut process before a Commission makes a finding on whether CLECs are impaired in switching mass-market customers. Qwest must also ensure that associated vendors (numbering administrator, E911 administrator, etc.) can handle any increased loads. (McLeod – p. 2)		

1/9/2004

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