



0000009202

ORIGINAL

19

RECEIVED

BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
CHAIRMAN
JIM IRVIN
COMMISSIONER
WILLIAM A. MUNDELL
COMMISSIONER

Arizona Corporation Commission
DOCKETED

2000 NOV 22 P 3:52

NOV 22 2000

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S STATEMENT
OF GENERALLY AVAILABLE TERMS AND
CONDITIONS.

DOCKET NO. T-01051B-99-0068

IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S COMPLIANCE
WITH §271 OF THE
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-01051B-⁹⁷~~99~~-0238

**COMPLIANCE FILING MODIFYING QWEST'S SGAT TO ADOPT COLLOCATION
PROVISIONING INTERVALS SET BY THE FCC**

Qwest Corporation ("Qwest") hereby requests that the Arizona Corporation Commission ("Commission") allow Section 8.4 of Qwest's Statement of Generally Available Terms ("SGAT") to be modified through operation of law by the physical collocation provisioning intervals set by the Federal Communications Commission ("FCC").¹ According to the FCC, the Commission should allow these new intervals to take effect 60 days after this filing pursuant to Section 252(f)(3)(B) of the Act.² Qwest makes this filing such that the SGAT modifications will become effective on January 21, 2001, the deadline set forth in the FCC's *Amended Order*.³

¹ See *Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC Docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, FCC 00-297 (rel. Aug. 10, 2000) ("Order on Reconsideration" or "Order"), as amended by Memorandum Opinion and Order, FCC 00-2528 (rel. Nov. 7, 2000) ("Amended Order").

² Standards within the SGAT that comport with the FCC Order "take effect when the state commission permits the amendments to take effect through operation of law." *Amended Order* at ¶7.

³³ *Amended Order* at ¶21

INTRODUCTION

A. Qwest's Original Collocation Provisioning Intervals Were Set Forth in its SGAT and the Arizona §271 Docket PIDs.

On February 8, 1999, Qwest, then known as U S WEST, filed an Application before the Commission to initiate a proceeding pursuant to § 271(c) of the Telecommunications Act of 1996 (the "Act"). On February 5, 1999, Qwest filed its original SGAT with this Commission, which constitutes Qwest's standard interconnection contract offer, that contains terms and conditions for each aspect of Sections 251 and 271 of the Act, including provisions concerning collocation. *See generally* SGAT § 8. The original SGAT contained detailed terms and conditions for collocation, including intervals for physical and virtual collocation. First, second and third revisions filed on October 29, 1999, April 10, 2000 and July 21, 2000 did not effect the original collocation filing. Provisioning collocation takes three distinct steps: (1) determining whether the collocation is feasible in the Premises requested; (2) if feasible, creation of a quote setting forth the costs attendant to the requested collocation; and (3) once CLEC has paid 50 percent of the quoted amount, for Qwest to complete actual installation of the collocation. In the past, Qwest completed all of these tasks in 155 calendar days. Specifically, for physical collocation, the SGAT provided that Qwest had 10 days to complete the feasibility, 25 days to complete quote preparation, and 90 days to complete the installation (CLEC had 30 days to make the requisite down payment). *See* SGAT § 8.4. The intervals formed the basis for the performance indicators (PIDs) negotiated through the Arizona §271 docket. These Arizona §271 docket PIDs were generally based on the same intervals for Qwest to complete collocation feasibility studies, collocation quotes, and collocation installations. *See Exhibit 1.*

B. The FCC Issued Two Recent Orders Affecting Qwest's Provisioning Intervals for Physical Collocation.

On August 10, 2000 the FCC issued an *Order on Reconsideration (Order)* establishing a national 90 day default physical collocation provisioning interval. This *Order* required Qwest, under ordinary circumstances, to complete all aspects of collocation in 90 days instead of the aforementioned 155 days. The August 10 *Order* also required Qwest and other incumbent LECs to amend their SGATs to reflect the new national standard.

The FCC's August 10, 2000 *Order*, however, did not mandate a 90 day provisioning interval in all circumstances. The *Order* states, ". . . except to the extent a state sets its own collocation provisioning standard or an incumbent LEC and requesting carrier have an interconnection agreement that sets an alternative standard, an incumbent LEC must complete physical collocation provisioning within 90 calendar days after receiving an acceptable collocation application."⁴ The *Order* also states that "[a]n incumbent LEC also may require a competitive LEC to forecast its physical collocation demands."⁵

On November 7, 2000, in response to waiver requests filed by Qwest, Verizon, and SBC, the FCC released an *Amended Order*, which clarified its earlier decision, and specifically established interim standards that apply during the pendency of the FCC's ongoing reconsideration of its August 10 *Order*. The FCC's interim standards for Qwest include forecasts as a precondition for 90 day intervals, longer intervals (120 days) for unforecasted collocation applications not requiring major infrastructure modifications, and even longer intervals (150 days) for unforecasted collocation applications that require Qwest to perform major infrastructure modifications such as adding DC Power, Standby Power Generators, and/or

⁴ *Order on Reconsideration* at ¶ 29.

⁵ *Order on Reconsideration* at ¶ 39.

HVAC to the requested premises.⁶ These intervals were specifically authorized by the FCC in its *Amended Order*.⁷

Through this filing, Qwest specifically accepts these intervals as appropriate interim modifications to Section 8.4 of its SGAT. The Commission should allow these intervals to take effect in 60 days through operation of law pursuant to Section 252(f)(3). All parties to this docket may then assess the propriety of these and other collocation intervals during the course of the Section 271 workshops. From those workshops, Qwest anticipates that the Commission will adopt permanent collocation intervals either through consensus reached in the workshops or through the dispute resolution process. Although Qwest accepts the FCC's intervals as an interim measure, it hereby places the Commission and all parties on notice that during the 271 workshops it will seek longer intervals in limited circumstances where it is physically or practically impossible to complete the collocation within the intervals set by the FCC. The FCC recognized that "specific circumstances" may arise that justify "a significantly longer provisioning interval."⁸ Unless and until the Commission adopts intervals to govern these circumstances, however, Qwest will file a request with the Commission seeking an extended interval for the specific collocation application.⁹

C. Although Qwest Does Not Seek Different Intervals Here, In the 271 Workshops Qwest Will Seek Longer Intervals For Circumstances that are Practically or Physically Impossible to Complete Within the FCC's Intervals.

⁶ *Amended Order* at ¶¶13-20.

⁷ Specifically, the FCC accepted the intervals set forth in "Attachment B" to Qwest's Petition for Waiver subject to only one limitation. *See Amended Order* at ¶¶9 & 19. Qwest's Waiver sought collocation intervals for unforecasted collocation up to 240 days for major reconfiguration of a premises. *Id.* at ¶18. The FCC stated that it would permit up to 60 additional days for unforecasted collocation "unless the state commission specifically authorizes longer intervals." *Id.* at ¶19. Attachment B to Qwest's Petition for Waiver is attached to this pleading as *Exhibit 2* for ease of reference.

⁸ *Order* at ¶29.

⁹ When no specific intervals exist for the unique circumstance, this is exactly what the FCC envisioned. *Id.* However, again, the FCC did encourage the Commission to set appropriate physical collocation intervals.

The *Amended Order* left it to the state commissions to determine whether longer intervals are appropriate under certain circumstances.¹⁰ For example, as stated in Qwest’s Petition for Waiver to the FCC, when “major infrastructure modifications” are required, and the CLEC did not forecast the collocation, additional time is necessary to complete the collocation. “Major infrastructure modifications” include the addition of (a) DC Power Plants; (b) AC Standby Generators; (c) HVAC; and (d) Space Conditioning.

During the 271 workshops, Qwest will also seek an extension of the 90 day interval in two circumstances where it is physically impossible to complete the collocation within 90 days. Specifically: (1) where the CLEC’s collocation application requires Qwest or the CLEC to construct a new premises to accommodate adjacent collocation; and (2) where the CLEC seeks remote collocation and Qwest must obtain new rights of way to complete the collocation. The rationale supporting these extremely limited exceptions that Qwest will ultimately seek are briefly set forth below.

II. ALTHOUGH NOT SEEKING IT AT THIS TIME, DURING THE 271 WORKSHOPS, QWEST WILL SEEK ADDITIONAL TIME TO PROVISION COLLOCATION UNDER CERTAIN CIRCUMSTANCES.

A. Provisioning Collocation Can Take More than 90 Days.

There is no real dispute that it takes longer than the FCC’s presumptive 90 day collocation interval to complete certain aspects of the collocation provisioning process. Indeed, in discussions during Section 271 workshops, several different CLECs have acknowledged that it takes longer than 90 days to perform certain functions. For example, several parties acknowledge that it takes approximately 6 months or 180 days to add power plant to a central

¹⁰ *Amended Order* at ¶19.

office when the current power supply is inadequate.¹¹ Similarly, AT&T has acknowledged that it takes more than 90 days to construct a new facility, if necessary to support an adjacent collocation request.¹²

B. The Limited Extensions That Qwest will Ultimately Seek to the 90 Day Physical Collocation Interval Are Appropriate.

1. The FCC Approved Forecasting as a Prerequisite to the 90 Day Interval.

Given these facts, the FCC specifically approved collocation intervals in excess of 90 days when the CLEC failed to provide a forecast:

Qwest's proposed reliance on forecasts [constitutes a] reasonable . . . interim measure to the extent it permits a 60-day increase in interval length when the carrier requesting collocation has failed to provide a timely and accurate forecast. We therefore will allow Qwest to increase the provisioning interval for a proposed physical collocation arrangement no more than 60 calendar days in the event a competitive LEC fails to timely and accurately forecast the arrangement.¹³

This forecasting requirement is reasonable and appropriate because it may be practically if not physically impossible to timely provision collocation without the forecast. In workshops throughout Qwest's region, most CLECs have supported the concept of providing collocation forecasts to Qwest.¹⁴ These CLECs recognize that "forecasts are very important for any kind of

¹¹ Colorado Workshop 2, September 20, 2000, Tr. page 95; Colorado Workshop 2, September 21, 2000 Tr. at pages 11 and 14; Six State Collaborative Workshop, Salt Lake City, Utah, Workshop 1, October 5, 2000, Tr. generally at pages 171-172, 176-178

¹² Six State Collaborative Workshop, Salt Lake City, Utah, Workshop 1, October 5, 2000, Tr. pgs 171- 172: Mr. Steese: Let me make sure I understand this, Mr. Wilson. To the extent that we have no structure available and a new building needs to be constructed to put the adjacent facility in, you're saying that needs to happen within 90 days? Mr. Wilson: I don't believe I'm saying that constructing the building has to be in that time. . .

¹³ *Amended Order* at ¶19.

¹⁴ Six State Collaborative Workshops, Salt Lake City, Utah, Workshop 1, October 6, 2000, Tr. pgs. 83-84

application like this". One CLEC specifically agreed that it would not object to providing collocation forecasts to Qwest in exchange for the 90 day provisioning interval.¹⁵

Forecasts are critical because collocation is not a simple request. As of May 2000, Qwest has provisioned 4,719 collocations throughout 1,268 central offices in its region. The number of collocation applications have been growing monthly to the point that Qwest receives in excess of 350 in virtually every month. Qwest also has approximately 150 pending and or approved interconnection agreements within the state of Arizona. This volume requires Qwest to spend substantial effort planning and coordinating its efforts to provide timely collocation feasibilities, quotes and installations. Forecasts are central to these efforts.

2. Collocations That Require "Major Structure Modifications" Take Longer Than 150 Days.

One of the reasons that Qwest is so adamant about the use of collocation forecasts is because, in some instances, Qwest must complete major structural changes in order to provision the requested collocation. For example, Qwest may have to add (a) DC Power Plants, (b) AC Standby Generators, (c) heating, ventilation or air conditioning (HVAC) when Qwest is converting administrative space into additional space for equipment, or (d) when Qwest must remove its own obsolete and unused equipment from the premises. These tasks take longer than 150 days to complete. For example, parties have already acknowledged that it takes 180 days to install additional power plant in a central office.¹⁶

3. There are also Circumstances Where it Would be Impossible to Complete the Collocation in 90 Days.

¹⁵ Six State Collaborative Workshop, Salt Lake City, Utah, Workshop 1, October 4, 2000, Tr. pgs 86-87: Mr. Steese: And McLeod would have no objection to submitting collocation forecasts on a routine basis to get those shortened time frames? Mr. Jennings: We'd have no objection to that. Mr. Steese: McLeod would be willing to provide forecasts to Qwest to get the shortened intervals? Mr. Jennings: Yes.

¹⁶ See *supra*, note 11.

As stated above, Qwest anticipates seeking two additional exceptions to the 90 day interval. These two limited exceptions are (1) where the CLEC's collocation application requires Qwest or the CLEC to construct new space to accommodate adjacent collocation; and (2) where the CLEC seeks remote collocation and Qwest must obtain new rights of way to complete the collocation.¹⁷ In both cases, it is physically impossible to complete the work within 90 days.

The first exception is undisputed. For adjacent collocation arrangements, there are instances where either Qwest or the CLEC must construct a new physical premises to house the collocation. AT&T acknowledges that it will take longer than 90 days to complete this work.¹⁸ As a result, Qwest will seek an ICB interval for these extremely unique circumstances. These circumstances are so rare that since passage of the Act, Qwest has never received a request for adjacent collocation, let alone an adjacent collocation request that required construction of a new premises.

The second exception is equally compelling. The FCC makes its *Order* applicable to physical collocations in any "Premises", which it defines as "all structures that house incumbent LEC facilities" 47 C.F.R. § 51.5. Qwest's SGAT contains detailed sections on "Remote Collocation", which constitutes collocating in a premises other than a central office. These structures can be Controlled Environmental Vaults (CEVs), Remote Terminals (RTs), Fiber Distribution Interfaces (FDIs) and the like. Qwest has hundreds of thousands of such outside plant structures throughout its region. Collocation in these remote premises can present unique issues, specifically involving rights of way. To the extent that Qwest or the CLEC must go to a municipal body to obtain such rights of way, the amount of time that it takes to obtain such rights

¹⁷ Adjacent collocation is required when space is "legitimately exhausted" in an existing structure, which simply put, means construction or procurement of an existing structure is usually required. In the Matters of Deployment of Wireline Services Offering Advanced Telecommunications Capability, First Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 98-147, FCC 99-48 (rel. March 31, 1999).]

¹⁸ It is undisputed that constructing a separate adjacent facility will always take longer than 90 days. *See supra*, note 12.

of way should not count against the 90 day provisioning interval. This is appropriate in light of the fact that Qwest will not be able to complete the collocation until such rights of way are obtained. In this situation, Qwest will not seek additional time to complete the collocation, it will simply assert that the time it takes to obtain the rights of way should not count against the 90 day interval. If Qwest or CLEC can obtain the rights of way in one day, the interval should be 90 days plus one day, or 91 days. If, however, the municipal body refuses to extend the requested rights of way, this decision should not count as a provisioning miss by Qwest. Similarly, if it takes the municipal body 6 months to extend the rights of way, that time should not be counted against Qwest. This too is a rare occurrence. Just like adjacent collocation, Qwest has yet to receive a request for remote collocation, let alone a remote collocation request where additional rights of way are required.

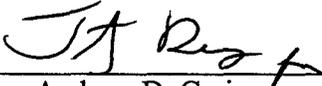
CONCLUSION

Qwest recognizes and appreciates the FCC's efforts to expedite physical collocation through the adoption of national provisioning intervals. Qwest is committed to provisioning collocation to requesting carriers as expeditiously as possible and, as a result, adopts the FCC's interim collocation intervals verbatim. Nonetheless, Qwest wants to place the Commission on notice that there are circumstances when more than 90 days is required to provision collocation. As a result, in the 271 workshops, Qwest will address these additional circumstances. However, until the Commission adopts different intervals, Qwest will seek individual waivers from the 90 day interval if, and when the circumstances arise that warrant the extended interval.

Thus, Qwest respectfully requests that the Commission issue an Order allowing section 8.4 of the SGAT to be amended consistent with the intervals set for in the FCC's *Amended Order* 60 days hence (January 21, 2001) pursuant to Section 252(f)(3) of the Act.

Respectfully submitted this 22nd day of November, 2000.

Qwest Corporation

By:  _____

Andrew D. Crain
Charles W. Steese
1801 California Street, Suite 3800
Denver, CO 80202
(303) 672-2926

FENNEMORE CRAIG, P.C.
Timothy Berg
Theresa Dwyer
3003 North Central Ave., Suite 2600
Phoenix, AZ 85012
(602) 916-5421
Attorneys for Qwest Corporation

**ORIGINAL and 10 copies of the foregoing filed
this 22nd day of November, 2000 with:**

Docket Control
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

**COPY of the foregoing hand-delivered
this 22nd day of November, 2000, to:**

Lyn Farmer
Maureen A. Scott
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Deborah Scott, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Jerry Rudibaugh, Chief Administrative Law Judge
Hearing Division
ARIZONA CORPORATION COMMISSION

1200 W. Washington
Phoenix, AZ 85007

**COPY of the foregoing mailed and/
or e-mailed
this 22nd day of November, 2000, to:**

Steven H. Kukta
Darren S. Weingard
Sprint Communications Company, LP
1850 Gateway Drive, 7th floor
San Mateo, CA 94404-2567

Thomas Campbell
Lewis & Roca
40 N. Central Ave.
Phoenix, AZ 85004

Joan S. Burke
Osborn Maledon, P.A.
2929 N. Central Ave., 21st Floor
PO Box 36379
Phoenix, AZ 85067-6379

Thomas F. Dixon
Karen L. Clausen
MCI Telecommunications Corp.
707 17th Street # 3900
Denver, CO 80202

Scott S. Wakefield
Residential Utility Consumer Office
2828 North Central Ave., Suite 1200
Phoenix, AZ 85004

Michael M. Grant
Gallagher & Kennedy
2600 N. Central Ave.
Phoenix, AZ 85004-3020

Michael Patten
Brown & Bain
2901 N. Central Ave.
Phoenix, AZ 85012

Bradley Carroll, Esq.
Cox Arizona Telcom, LLC
1550 West Deer Valley Rd.
Phoenix, AZ 85027

Daniel Waggoner
Davis, Wright & Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688

Richard S. Wolters
Maria Arias-Chapleau
AT&T Law Department
1875 Lawrence Street # 1575
Denver, CO 80202

David Kaufman
e.spire Communications, Inc.
343 W. Manhattan Street
Santa Fe, NM 87501

Alaine Miller
NEXTLINK Communications, Inc.
500 108th Ave. NE, Suite 2200
Bellevue, WA 98004

Diane Bacon, Legislative Director
Communications Workers of America
5818 N. 7th St., Suite 206
Phoenix, Arizona 85014-5811

Nigel Bates
Electric Lightwave, Inc.
4400 NE 77th Ave.
Vancouver, WA 98662

Philip A. Doherty
545 South Prospect Street, Suite 22
Burlington, VT 05401

W. Hagood Bellinger
5312 Trowbridge Drive
Dunwoody, GA 30338

Joyce Hundley
U.S. Dept. of Justice
Antitrust Division
1401 H Street, NW, # 8000
Washington, DC 20530

Andrew O. Isar
Telecommunications Resellers Association

4312 92nd Ave., NW
Gig Harbor, WA 98335

Raymond S. Heyman
Randall H. Warner
Two Arizona Center
400 North 5th Street, Suite 1000
Phoenix, AZ 85004-3906

Craig Marks
Citizens Utilities Company
2901 North Central Avenue, Suite 1660
Phoenix, Arizona 85012

Douglas Hsiao
Rhythms Links, Inc.
6933 Revere Parkway
Englewood, CO 80112

Mark Dioguardi
Tiffany and Bosco, PA
500 Dial Tower
1850 N. Central Avenue
Phoenix, AZ 85004

Thomas L. Mumaw
Snell & Wilmer
One Arizona Center
Phoenix, AZ 85004-0001

Richard Rindler
Morton J. Posner
Swider & Berlin
3000 K Street, NW, Suite 300
Washington, DC 20007

Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway
Annapolis Junction, Maryland

Patricia Van Midde
Assistant Vice President
AT&T
111 West Monroe
Suite 1201
Phoenix, AZ 85003

Gena Doyscher

Global Crossing Services, Inc.
1221 Nicollet Mall
Minneapolis, MN 55403-2420

Karen L. Clauson
Eschelon Telecom, Inc.
730 Second Avenue South, Suite 1200
Minneapolis, MN 55402

Mark N. Rogers
Excell Agent Services, LLC
2175 W. 14th Street
Tempe, AZ 85281

Janet Livengood
Regional Vice President
Z-Tel Communications, Inc.
601 S. Harbor Island Blvd.
Tampa, FL 33602

Jonathan E. Curtis
Michael B. Hazzard
Kelly Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036

Lindall Nipps
Allegiance Telecom, Inc.
845 Camino Sur
Palm Springs, CA 92262

Andrea P. Harris
Sr. Manager, Reg.
Allegiance Telecom, Inc.
PO Box 2610
Dublin, CA 94568

Gary L. Lane, Esq.
6902 East 1st Street, Suite 201
Scottsdale, AZ 85251

J. David Tate
Senior Counsel
SBC Telecom, Inc.
5800 Northeast Parkway, Suite 125
San Antonio, Texas 78249

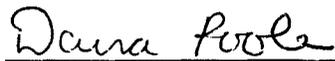
Penny Bewick
Electric Lightwave, Inc.

4400 NE 77th Avenue
Vancouver, Washington 98662

Carrington Phillips
Cox Communications
1400 Lake Hearn Drive, NE
Atlanta, GA 30319

Bill Haas
Richard Lipman
McLeodUSA
6400 C Street, SW
Cedar Rapids, Iowa 54206-3177

Richard Smith
Cox California Telecom, Inc.
Two Jack London Square
Oakland, CA 94697



PHX/DPOOLE/1128058.1/67817.150

EXHIBIT 1
Collocation

CP-1 – Installation Interval

Purpose: Evaluates the timeliness of Qwest's installation of collocation arrangements for CLECs, focusing on the average time to complete such arrangements.	
Description: Measures the interval between the receipt of the down payment from the CLEC and the completion of the collocation installation, expressed in calendar days. <ul style="list-style-type: none"> • Includes all collocations assigned a Ready For Service (RFS) date by Qwest and completed during the reporting period, subject to exclusions specified below. 	
Reporting Period: One month	Unit of Measure: Average Calendar Days
Reporting Comparisons: CLEC aggregate and individual CLEC results	Disaggregation Reporting: Statewide level. Results for this indicator are disaggregated and reported as follows: A-1 Virtual, Physical Caged, and Shared Collocation. A-2 Augments to Virtual, Physical Caged, and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.
Formula: $\frac{\sum[(\text{Collocation Completion Date}) - (\text{Collocation Interval Start Date})]}{(\text{Total Number of Collocations Completed in Reporting Period})}$	
Exclusions: <ul style="list-style-type: none"> • CLEC orders involving requests for RFS dates yielding longer than 90 calendar day intervals. • RFS dates missed for CLEC-not-ready; • RFS dates missed for CLEC equipment delays. 	
Product Reporting: <ul style="list-style-type: none"> • Virtual, Physical Caged, and Shared Collocation • Cageless Collocation 	Standard: 90 calendar days
Availability: Available	Notes:

CP-2 – Installation Commitments Met

Purpose: Evaluates the extent to which Qwest completes collocation arrangements for CLECs as scheduled or promised.	
Description: Measures the percentage of collocation orders for which the Ready For Service (RFS) date is met. <ul style="list-style-type: none"> • Includes all collocations assigned a RFS date by Qwest and completed within the reporting period, including those with CLEC-requested RFS dates longer than the standard interval and those with extended RFS dates negotiated with the CLEC (including supplemented collocation orders that extend the RFS date). • A collocation arrangement is counted as met under this measurement if its Collocation Completion Date is the same as, or earlier than, the assigned RFS date. • For CLECs with interconnection agreements that specify collocation installation intervals, and for individually negotiated intervals, the agreed-upon interval is the one measured. • For CLECs with interconnection agreements that do not specify collocation installation intervals, the intervals applied for this measurement will be 90 calendar days for all types of collocation and augments thereto. 	
Reporting Period: One month	Unit of Measure: Percent
Reporting Comparisons: CLEC aggregate and individual CLEC results	Disaggregation Reporting: Statewide level. Results for this indicator are disaggregated and reported as follows: <ul style="list-style-type: none"> A-1 Virtual, Physical Caged, and Shared Collocation A-2 Augments to Virtual, Physical Caged, and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.
Formula: $\left[\frac{\text{Count of Collocations with Collocation Completion Dates that are the same as, or earlier than, the assigned Ready for Service Date}}{\text{Total Number of Collocations Completed in the Reporting Period}} \right] \times 100$	
Exclusions: <ul style="list-style-type: none"> • RFS dates missed for CLEC-not-ready; • RFS dates missed for CLEC equipment delays. 	
Product Reporting: <ul style="list-style-type: none"> • Virtual, Physical Caged, and Shared Collocation • Cageless Collocation 	Standard: 90 percent or more
Availability: Available	Notes:

CP-3 (ROC) – Feasibility Study Interval

Purpose: Evaluates the timeliness of the Qwest sub-process function of providing a collocation feasibility study to the CLEC.	
Description: Measures average interval to respond to Central Office collocation studies for feasibility of installation. <ul style="list-style-type: none"> Includes feasibility studies associated with collocation arrangements that are completed in the reporting period. 	
Reporting Period: One month	Unit of Measure: Average Business days
Reporting Comparisons: CLEC aggregate and individual CLEC results	Disaggregation Reporting: Statewide level. Results for this indicator are disaggregated and reported as follows: A-1 Virtual and Physical Caged and Shared Collocation A-2 Augments to Virtual and Physical Caged and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.
Formula: $\frac{\Sigma[(\text{Date of Feasibility Study completion}) - (\text{Date of receipt of CLEC request for Feasibility Study})]}{(\text{Total applicable number of requests received for Feasibility Studies})}$	
Exclusions: <ul style="list-style-type: none"> CLEC-requested feasibility study completions greater than standard feasibility study intervals. 	
Product Reporting: <ul style="list-style-type: none"> Virtual, Physical Caged, and Shared Collocation Cageless Collocation 	Standard: 10 business days or less
Availability: Available	Notes:

CP-4 – Feasibility Study Commitments Met

Purpose: Evaluates the degree that Qwest met its stated commitment in the sub-process function of providing a collocation feasibility study to the CLEC.	
Description: Measures the percentage of collocation feasibility studies for installations that are completed within the allotted time frame for such studies. <ul style="list-style-type: none"> • Includes all feasibility studies associated with collocation arrangements completed in the reporting period. • For CLECs with interconnection agreements that identify a collocation feasibility study interval, and for individually negotiated intervals, the agreed-upon interval is the one measured. • For CLECs without interconnection agreements that identify a collocation feasibility study interval, the interval measured is 7 business days for virtual collocation and 10 business days for physical collocation. 	
Reporting Period: One month	Unit of Measure: Percent
Reporting Comparisons: CLEC aggregate and individual CLEC results	Disaggregation Reporting: Statewide level. Results for this indicator are disaggregated and reported as follows: A-1 Virtual and Physical Caged and Shared Collocation A-2 Augments to Virtual and Physical Caged and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.
Formula: $\left[\frac{\text{Total Applicable Collocation Feasibility studies completed in agreed-upon timeframe}}{\text{Total applicable Collocation Feasibility studies completed}} \right] \times 100$	
Exclusions: None	
Product Reporting: <ul style="list-style-type: none"> • Virtual, Physical Caged, and Shared Collocation • Cageless Collocation 	Standard: 90 percent or more
Availability: Available	Notes:

CP-5 (ROC) – Quote Interval

<p>Purpose: Evaluates the timeliness of the Qwest sub-process function of providing a collocation quote commitment to the CLEC.</p>	
<p>Description: Measures the average interval to respond to Central Office collocation studies with quote commitments.</p> <ul style="list-style-type: none"> Includes quotes associated with collocation arrangements that are completed in the reporting period. 	
<p>Reporting Period: One month</p>	<p>Unit of Measure: Average Calendar days</p>
<p>Reporting Comparisons: CLEC aggregate and individual CLEC results</p>	<p>Disaggregation Reporting: Statewide level. Results for this indicator are disaggregated and reported as follows:</p> <ul style="list-style-type: none"> A-1 Virtual and Physical Caged and Shared Collocation A-2 Augments to Virtual and Physical Caged and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.
<p>Formula: $\Sigma[(\text{Date of Quote delivery to CLEC}) - (\text{Date of receipt of CLEC request for Collocation quote})] / (\text{Total applicable number of requests received for Collocation quotes})$</p>	
<p>Exclusions: CLEC requested due date beyond standard Collocation quote interval.</p>	
<p>Product Reporting:</p> <ul style="list-style-type: none"> Virtual Physical Caged and Shared Collocation Cageless Collocation 	<p>Standard: 25 days or less</p>
<p>Availability: Available</p>	<p>Notes:</p>

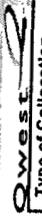
CP-6 – Quote Commitments Met

Purpose: Evaluates the degree that Qwest met its stated commitment in the sub-process function of providing a collocation quote to the CLEC.	
Description: Measures the percentage of Central Office collocation quotes that are completed within the allotted time frame. <ul style="list-style-type: none"> • Includes quotes associated with collocation arrangements that are completed in the reporting period. • For CLECs with interconnection agreements that identify a collocation quote interval, and for individually negotiated intervals, the agreed-upon interval is the one measured. • For CLECs without interconnection agreements that identify a collocation quote interval, the interval measured is 25 calendar days. 	
Reporting Period: One month	Unit of Measure: Percent
Reporting Comparisons: CLEC aggregate and individual CLEC results	Disaggregation Reporting: Statewide level. Results for this indicator are disaggregated and reported as follows: A-1 Virtual and Physical Caged and Shared Collocation A-2 Augments to Virtual and Physical Caged and Shared Collocations. B-1 Cageless Collocations. B-2 Augments to Cageless Collocations.
Formula: $\left[\frac{\text{Total Applicable Collocation Quotations completed in agreed-upon timeframe}}{\text{Total applicable Collocation Quotations completed}} \right] \times 100$	
Exclusions: None	
Product Reporting: <ul style="list-style-type: none"> • Virtual Physical Caged and Shared Collocation • Cageless Collocation 	Standard: 90 percent or more
Availability: <p style="text-align: center;">Available</p>	Notes:

Exhibit 2

Collocation Intervals

Qwest		Forecast / Requirements		Application		Space Feasibility		Quote Issuance		Quote Acceptance		Delivery of Equipment		Completion	
Caged , Cageless	With annual forecast, updated quarterly, with forecast to be received a minimum of 60 calendar days prior to submission of application	day 1	Within 10 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	Written acceptance and 50% payment within 7 calendar days of quote issuance	Within 90 calendar days of application									
Caged , Cageless	With annual forecast, updated quarterly, with forecast to be received a minimum of 60 calendar days prior to submission of application	day 1	Within 10 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	If written acceptance and 50% down payment is not received within 7 calendar days of quote issuance, and is less than 30 calendar days from quote issuance	Within 90 calendar days from receipt of written acceptance and 50% down payment.									
Caged , Cageless	If no forecast	day 1	Within 20 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	Written acceptance and 50% payment within 7 calendar days of quote issuance	Within 120 calendar days of application + additional days* if HVAC &/or DC power is required									
Caged , Cageless	If no forecast	day 1	Within 20 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	If written acceptance and 50% down payment is not received within 7 calendar days of quote issuance, and is less than 30 calendar days from quote issuance	Within 120 calendar days from receipt of written acceptance and 50% down payment + additional days* if HVAC &/or DC power is required.									
Virtual	With annual forecast, updated quarterly, with forecast to be received a minimum of 60 calendar days prior to submission of application	day 1	Within 10 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	Written acceptance and 50% payment within 7 calendar days of quote issuance	Within 90 calendar days of application									
Virtual	With annual forecast, updated quarterly, with forecast to be received a minimum of 60 calendar days prior to submission of application	day 1	Within 10 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	Written acceptance and 50% payment within 7 calendar days of quote issuance	45 calendar days from date of receipt of CLEC's equipment.									
Virtual	With annual forecast, updated quarterly, with forecast to be received a minimum of 60 calendar days prior to submission of application	day 1	Within 10 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	If written acceptance and 50% down payment is not received within 7 calendar days of quote issuance, and is less than 30 calendar days from quote issuance	Within 90 calendar days from receipt of written acceptance and 50% down payment.									
Virtual	With annual forecast, updated quarterly, with forecast to be received a minimum of 60 calendar days prior to submission of application	day 1	Within 10 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	If written acceptance and 50% down payment is not received within 7 calendar days of quote issuance, and is less than 30 calendar days from quote issuance	45 calendar days from date of receipt of CLEC's equipment.									
Virtual	If no forecast	day 1	Within 20 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	Written acceptance and 50% payment within 7 calendar days of quote issuance	Within 120 calendar days of application + additional days* if HVAC &/or DC power is required									
Virtual	If no forecast	day 1	Within 20 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	Written acceptance and 50% payment within 7 calendar days of quote issuance	75 calendar days from date of receipt of CLEC's equipment + additional days* if HVAC &/or DC power is required									



Type of Collocation	Forecast / Requirements	Application	Space Feasibility	Quote Issuance	Quote Acceptance	Delivery of Equipment	Completion
Virtual	If no forecast	day 1	Within 20 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	If written acceptance and 50% down payment is not received, within 7 calendar days of quote issuance, and is less than 30 calendar days from quote issuance	All CLEC equipment delivered to collocation site within 45 days from date of application	Within 120 calendar days of written acceptance and 50% down payment + additional days* if HVAC &/or DC power is required
Virtual	If no forecast	day 1	Within 20 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	If written acceptance and 50% down payment is not received, within 7 calendar days of quote issuance, and is less than 30 calendar days from quote issuance	CLEC equipment not delivered to collocation site within 45 days from date of application	75 calendar days from date of receipt of CLEC's equipment + additional days* if HVAC &/or DC power is required
Virtual Augment	With annual forecast, updated quarterly, with forecast to be received a minimum of 60 calendar days prior to submission of application	day 1	Within 10 calendar days of receipt of an acceptable application	Within 10 Calendar days from issuance of feasibility	Written acceptance and 50% payment within 7 calendar days of quote issuance		Within 30 calendar days upon receipt of acceptance and 50% down payment
ICDF	With annual forecast, updated quarterly, with forecast to be received a minimum of 60 calendar days prior to submission of application	day 1	Within 10 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	Written acceptance and 50% payment within 7 calendar days of space quote issuance		Within 45 calendar days of application
ICDF	With annual forecast, updated quarterly, with forecast to be received a minimum of 60 calendar days prior to submission of application	day 1	Within 10 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	If written acceptance and 50% down payment is not received, within 7 calendar days of quote issuance, and is less than 30 calendar days from quote issuance		Within 45 calendar days from receipt of written acceptance and 50% down payment.
ICDF	If no forecast	day 1	Within 20 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	Written acceptance and 50% payment within 7 calendar days of quote issuance		Within 90 calendar days of application
ICDF	If no forecast	day 1	Within 20 calendar days of receipt of an acceptable application	Within 25 Calendar days from issuance of feasibility	If written acceptance and 50% down payment is not received, within 7 calendar days of quote issuance, and is less than 30 calendar days from quote issuance		Within 90 calendar days from receipt of written acceptance and 50% down payment.

* Additional Days:

- To install a power plant requires an additional 60 days (total 180 day interval).
 - To install diesel generators requires an additional 120 days (total 240 day interval).
 - If an HVAC job is needed, it could require an additional 30 to 90 days (total 150 to 210 day interval).
- NOTE: Intervals are contingent upon outside vendor availability and material lead times.

If CLEC does not respond with both written acceptance and 50% down payment within 30 calendar days of quote issuance, the application will be canceled. An application, if containing deficiencies, must be returned to the CLEC noting all deficiencies within 10 calendar days of receipt of the application, and a 10 calendar exists for the CLEC to resubmit the application or lose its place in the 1st-come, 1st-served queue.