



BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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OCT 20 2000

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ARIZONA CORPORATION COMMISSION
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IN THE MATTER OF US WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

Docket No. T-00000A-97-238

**COX ARIZONA TELCOM, INC.'S
COMMENTS ON CHECKLIST ITEM 11
(NUMBER PORTABILITY)**

INTRODUCTION

Cox Arizona Telcom ("Cox") provides facilities-based local exchange service in the Phoenix metropolitan area, primarily through the use of a hybrid fiber coaxial network that is separate from Qwest's ubiquitous telephony network. Because Cox uses its own network facilities, number porting is the key Qwest service used by Cox in migrating customers from Qwest to Cox. The number porting occurs in close conjunction with the physical connection of the customer's premises to the Cox telephone network. As such, Qwest procedures on number porting and its representations about the timing of number ports are critical to a successful customer migration without the customer's loss of dial tone.

Although Cox acknowledges that Qwest makes number portability available in Arizona, the mere availability of number portability is not sufficient to meet Checklist Item 11. Cox has experienced and continues to experience a variety of problems with Qwest's number portability. Cox is particularly concerned that Qwest has adopted policies and

1 procedures that are the root of these problems and that are in effective for the porting needs
2 of Cox, particularly in the residential market.

3 Section 271(c)(2)(B)(xi) of the 1996 Telecommunications Act requires Qwest to be in
4 compliance with the number portability regulations the FCC has adopted pursuant to Section
5 251 of the 1996 Act. 47 U.S.C. § 271(c)(2)(B)(xi). Section 251(B)(2) of the Act requires all
6 LECs “to provide, to the extent technically feasible, number portability in accordance with
7 requirements prescribed by the [FCC].” 47 U.S.C. § 251(b)(2). The Act defines number
8 portability as “the ability of users of telecommunications services to retain, at the same
9 location, existing telecommunications numbers without impairment of quality, reliability, or
10 convenience when switching from one telecommunications carrier to another.” 47 U.S.C.
11 § 153(30). The FCC has incorporated this definition into its rules. 47 C.F.R. § 52.21(k).

12 Due to the myriad of significant number portability problems Cox continues to
13 experience, Qwest does not yet meet the requirements of Checklist Item 11.

14 **RESPONSE TO BUMGARNER AFFIDAVIT**

15 Cox disagrees with several points made in Ms. Bumgarner’s Affidavit (dated June 30,
16 2000).

17 First, although Qwest asserts (at p. 3 of text) that it is updating procedures and timely
18 providing documentation to CLECs, Cox’s experience is otherwise. Cox does not receive
19 timely updates of all procedures. Moreover, as set forth below in more detail, Qwest does
20 not consistently follow its stated procedures.

21 Second, Qwest states (at p. 4 of text) that it has created a better process for pre-setting
22 an LSA trigger. That system is an improvement *if* Qwest does not disconnect a former
23 Qwest customer until the port is completed. However, once the customer is disconnected
24 from the Qwest network before the port occurs, the trigger disappears. This problem arises
25 particularly where a due date is pushed out, but Qwest disconnects that customer on the
26 *original* due date. At that point, the CLEC has no control over the activation of number

1 portability and the CLEC must go through a time consuming process with Qwest to get the
2 customer reconnected to Qwest until the new due date. As set forth below, this premature
3 disconnect activity by Qwest occurs frequently.

4 Third, as set forth below, Qwest is still improperly reassigning numbers ported to
5 CLECs, despite its statements to the contrary. [Bumgarner Aff. at p. 4 of text]

6 CONTINUING QWEST NUMBER PORTABILITY PROBLEMS

7 The problems Cox experiences with Qwest LNP generally fall within several discrete
8 categories.

9 **A. Improper Rescission of Firm Order Commitments**

10 Qwest regularly rescinds Firm Order Commitments (“FOCs”) for number portings.
11 Typically, Qwest will issue the FOC within its IRRG FOC Guideline time period, but then
12 rescind the FOC after that time period has passed. Occasionally, Qwest rescinds the FOC
13 without notifying Cox. Moreover, because Qwest often rescinds the FOC several days after
14 the FOC is sent to Cox, Cox – in many instances – already has notified the customer of the
15 porting date. Cox must then contact the customer to cancel that date, often without a firm
16 date for rescheduling. This problem has worsened over the past two months. Apparently,
17 the problem results from Qwest conducting a delayed “clean up” of its ordering system that
18 rejects FOCs already issued. Unfortunately, this issuance/rescission pattern may create an
19 improper impression that Qwest is satisfying LNP or FOC performance measures, when in
20 fact it is not.

21 Further, the reasons provided by Qwest for rescinding an FOC often are improper.
22 Qwest has rejected LNP LSRs for reasons such as:

- 23 ▪ Cell phones on the Qwest account are not addressed on the LSR;
- 24 ▪ Distinctive ring numbers are not addressed on the LSR even
25 though Qwest is not porting that service;
- 26 ▪ The LSR does not include billing account information on services
not being ported; and

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- There are “pending orders” with Qwest for things such as video, high-speed data and features orders on the porting customer’s account.

The FOC rescission problem occurs up to several times a day. As a result, there are a significant number of specific instances that are too voluminous to present here. Cox has attached summaries of several specific examples of this particular problem at *Tab A*. An example of these summaries is as follows:

- On October 7, 2000 (at 4:17 p.m.), Cox sent a local service request (“LSR”) to Qwest requesting a port date of October 18, 2000 for two telephone numbers.
- On October 7, 2000 (at 4:18 p.m. and 4:21 p.m.), Qwest issued to Cox disconnect orders to port the numbers on October 18, 2000 (the FOC).
- Two days later, on October 9, 2000 (at 8:17 a.m. and 8:33 a.m.), Qwest rejected the LSRs to port the two numbers. The rejection email noted that the rejects were part of a flow through clean up by quest.
- On October 10, 2000, Cox had to contact the customer to reschedule.

Qwest must institute a process that ensures an FOC is indeed “firm.” It has not done so.

B. Premature Porting by Qwest

Qwest regularly completes porting orders (by disconnecting a telephone number and/or deleting the porting customer’s billing information from its system) either: (i) prior to the agreed-to porting time frame or (ii) even though Cox has timely and properly notified Qwest of the need to change or cancel the due date. As a result, potential Cox customers are left without dial tone, which takes significant time and effort to reconnect. Apparently, Qwest is unwilling or unable to stop the disconnect within Qwest’s system, even with
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...
...

1 advance notification, and even if it will leave a customer without dial tone.¹

2 This problem started in August of this year when Qwest changed its disconnect
3 procedures and are a direct result of Qwest's failure to disconnect at the appropriate time in
4 accordance with its stated process. Qwest is supposed to disconnect the customer after
5 normal business hours (approximately 8:00 p.m. *Mountain Standard Time*). However,
6 Qwest is now disconnecting numbers throughout the day in complete disregard of the
7 agreed-to times for disconnection. This often results in premature disconnection where
8 porting does not occur as scheduled due to circumstances such as customer unavailability. It
9 also does not allow Cox adequate time to change the due date prior to disconnection.²

10 The premature porting problem occurs on a regular basis, again up to several times a
11 day. Attached at *Tab B* are summaries of specific examples where, despite notice from Cox
12 that a port date must be changed, Qwest disconnected the customer and the customer lost dial
13 tone. Often, particularly for residential customers, the need to change a port date is not
14 known until a Cox installer arrives at the customer's premises on the day of the port. Cox's
15 primary concern is that, as the examples show, Cox provides notice to Qwest well before the
16 stated port time of 8:00 p.m. *MST*, but Qwest fails to prevent to the port. That harms the
17 customer.

18 Qwest's current inconsistent procedures are particularly troublesome for the residen-
19 tial market where individual circumstances often result in a need to change the port date or
20 time. Qwest must improve its ability and willingness to respond to due date changes up to
21 the time of disconnect to ensure that customers (and residential customers in particular) do

23 ¹ In addition, if the billing information is deleted, Qwest requires that a new customer
24 account be established before the customer can be ported to Cox, causing delay in the customer
25 transfer to Cox and significantly increasing Cox's paperwork for the transfer.

26 ² This problem is further exacerbated by the difficulty of Qwest's escalation process beyond
the call center. Calls and pages are not returned and the resolution of problems is simply put off
without any effort to facilitate such resolution in a timely manner.

1 not experience either service interruptions or delays in transferring to Cox. Qwest's current
2 number portability process does not do that and does not meet the "quality, reliability and
3 convenience" requirement of 47 U.S.C. § 251(b)(2) and 47 U.S.C. § 153(30).

4 **C. Failure to Provide Notice of Changes in Procedures/Failure to**
5 **Follow Stated Procedures**

6 Qwest repeatedly has modified processes for number porting and related escalation
7 procedures without timely notifying Cox. Even if notice of a new or modified process is
8 provided to Cox, Qwest often follows a different process than the one provided. This is
9 particularly true for escalation processes. These discrepancies lead to the problems set forth
10 above and to other delays in the porting of customers to Cox. Moreover, Qwest does not
11 discuss procedure changes with Cox in advance to identify potential difficulties with the
12 proposed changes. Although Cox has frequently raised process concerns with Qwest, Qwest
13 continues to require processes that are not timely or properly communicated to Cox.

14 One particular example of inconsistent procedures (or perhaps a failure to notify Cox
15 of procedural changes) involves the timing of a supplemental LSR to cancel or modify a
16 porting disconnect order. Qwest told Cox that the procedure was to call Qwest with a verbal
17 request to cancel (Qwest would then prepare an escalation ticket) and then to follow up the
18 call with a supplemental LSR by 12:00 p.m. the next business day. However, Cox often is
19 required to submit an LSR before the port is cancelled. A related inconsistency is that Qwest
20 may or may not require a supplemental LSR to restore dial tone to a customer that was
21 prematurely ported and thus disconnected. Attached at *Tab C* are several summaries of
22 Qwest's inconsistent procedures.

23 **D. Inadequate Porting Time Periods**

24 Qwest does not provide the same installation coverage for Cox as it does for itself.
25 Presently, Qwest limits Cox's Saturday porting from 6:00 a.m. to 2:00 p.m. (*Mountain*
26 *Standard Time*) which is affected twice a year by Daylight Savings Time. However, Qwest

1 provides the equivalent service to its customers from 8:00 a.m. to 5:00 p.m. (*Arizona Time*)
2 on Saturdays, which is not affected by Daylight Savings Time. Therefore, Qwest can
3 activate customers over a significantly broader range of time on Saturdays than Cox, because
4 Cox is limited by restrictions on Qwest's number portability support (which is a key aspect
5 of migrating a customer to Cox). Although Qwest has an obligation to provide Cox with
6 service that is equivalent to that which it provides itself, Qwest repeatedly has refused Cox's
7 requests for equivalent Saturday coverage.

8 **E. Improper Reassignment of Ported Numbers**

9 As discussed above, on multiple (and recently increasing) occasions, Qwest has
10 assigned telephone numbers to Qwest customers that have already been ported to Cox
11 customers. This interrupts service to the Cox customers. Resolution of improper number
12 assignments is slow and difficult given Qwest's procedures. Qwest still needs to improve its
13 internal processes to eliminate the potential for these improper reassignments.

14 Attached at *Tab D* are summaries of several recent instances where Qwest reassigned
15 previously-ported numbers.

16 **SUMMARY**

17 Given continuing significant problems with the quality, reliability and convenience of
18 porting customers from Qwest to Cox, Qwest does not satisfy Checklist Item 11.

19
20 October 20, 2000.

21 **COX ARIZONA TELCOM. L.L.C.**

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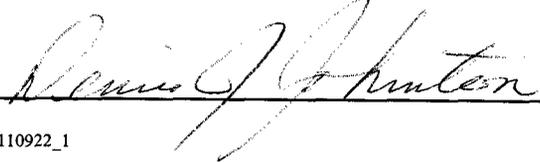
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A

Qwest rejected an LSR (Local Service Request) after an FOC (Firm Order of Commitment) was received on telephone number 480-614-4586. As a result of Qwest rejecting the LSR the customer was required to reschedule the phone install with Cox. Cox received inconsistent information each time Qwest was contacted to find out why the LSR was rejected.

- 10/12/00 2:00 P.M. MST (Mountain Standard Time) requesting to port telephone number 480-614-0586 on 10/23/00.
- 10/12/00 2:00 P.M. MST Qwest sent FOC with disconnect order to port (D32352952) on 10/23/00 as requested.
- 10/13/00 Cox received a voice mail from David at Qwest stating a reject would be sent to replace the FOC issued by Qwest. David mentioned in the voice mail that the customer had recently moved and Cox put the customer's old address on the LSR.
- 10/13/00 9:58 A.M. Qwest sent reject on LSR (ID 1501347) stating the end user name, telephone number or address is inconsistent.
- 10/14/00 Cox received duplicate paperwork and started processing a new LSR. Cox found the previous LSR was rejected through entering the new LSR into the IMA (Interconnect Mediated Access) system.
- 10/14/00 10:27 A.M. Cox contacted Qwest's call center and was advised the LSR was rejected because the account was disconnected.
- 10/16/00 9:11 P.M. Cox LNP (Local Number Portability) group checked using IMA (interconnect Mediated Access) the status of the LSR which now shows issued.

A Cox LSR (Local Service Request) was rejected after FOC (Firm Order of Commitment) was received from Qwest on telephone number 602-992-0282 and 602-404-8129. The customer porting to Cox rescheduled the phone install to port as a result of Qwest rejecting the requests from Cox to port.

- 10/07/00 4:17 P.M. LSR for telephone numbers 602-992-0282 and 602-404-8129 were sent by Cox through IMA (Interconnect Mediated Access) requesting a port date of 10/18/00.
- 10/07/00 4:18 P.M. Disconnect order (D32043411) was issued by Qwest to port telephone number 602-404-8129 with a due date of 10/18/00.
- 10/07/00 4:21 P.M. Disconnect order (D32043418) was issued by Qwest to port telephone number 602-992-0282 with a due date of 10/18/00.
- 10/09/00 8:17 A.M. Qwest rejected the LSR to port telephone number 602-404-8129. The comments on the reject indicate the disconnect order to port (D32043411) was canceled due to a transfer order (T31335457) pending with Qwest. Additional comments state the reject was issued as a result of a flow through cleanup by Qwest.
- 10/09/00 8:33 A.M. Qwest rejected the LSR to port telephone number 602-992-0282. The comments on the reject from Qwest indicates the disconnect order to port (D32043418) was canceled due to transfer order (T31329421) is pending with Qwest. The comments also indicate this was a flow through clean up by Qwest.
- 10/09/00 Cox Communications sent information to Cox Sales representative asking them to contact the customer and advise them the port date would not take place on 10/18/00 as a result of Qwest rejecting the Cox orders to port.
- 10/10/00 Customer contacted Cox stating contact was made with Qwest requesting any pending work orders be canceled. Customer rescheduled phone install to port to Cox Communications to 10/21/00.

Qwest rejected LSR (Local Service Request) after Cox received an FOC (Firm Order of Commitment) to port the telephone number 480-488-4561. Cox received the LSR reject eleven days after the LSR was submitted for port. As a result of the delay on the reject, Cox had minimal time to contact the customer and advise them of the situation prior to the scheduled install date of 10/18/00.

- 10/05/00 10:24 A.M. Cox sent LSR (ID 1471068) requesting to port telephone number 480-488-4561 on 10/18/00.
- 10/06/00 9:37 A.M. Qwest sent an FOC to port telephone number on disconnect order (D31294748) effective 10/18/00.
- 10/16/00 5:37 A.M. Qwest rejected the FOC indicating the customer had changed their telephone number in September, the reject further indicates that the customer disconnected their new number on Qwest disconnect order (D30356575).

Qwest sent an FOC (Firm Order Commitment) on telephone number 480-812-4765 and then rejected the LSR indicating the end user name, address, and or telephone number is inconsistent.

- 10/03/00 3:49 P.M. MST (Mountain Standard Time) Cox sent LSR (ID 1462962) requesting to port telephone number 480-812-4765.
- 10/04/00 7:38 A.M. Qwest rejected the paperwork indicating the information submitted on the LSR was inconsistent.
- 10/16/00 7:04 A.M. Cox spoke with Lena at Qwest's Interconnect group to verify the reason why the LSR was rejected. Qwest indicated that Cox canceled the disconnect order to port. Lena gave escalation ticket 532515 and transferred Cox to Qwest's Denver Proactive Center.
- 10/16/00 7:10 A.M. Kathy stated that the disconnect order to port was not canceled but was rejected due to inconsistent information.
- 10/16/00 9:15 A.M. Cox resubmitted LSR requesting a new disconnect porting date.
- 10/17/00 9:35 A.M. Cox corrected address and resubmitted LSR (ID 1516179).

Cox sent LSR (Local Service Request) to Qwest requesting to port telephone number 480-675-8785 to Cox. Qwest sent an FOC (Firm Order of Confirmation) and then rejected the paperwork due to a flow through clean up by Qwest. Comments on the LSR indicate the customer has disconnected with Qwest. Cox customer was expecting Cox telephone install on 08/31/00. As a result of Qwest rejecting the paperwork the customer's Cox telephone install was rescheduled.

- 08/25/00 11:02 A.M. (MST) Cox sent an LSR (Local Service Request) to Qwest requesting to port telephone number 480-675-8785 effective 08/31/00.
- 08/25/00 11:02 A.M. (MST) Qwest sent an FOC issuing disconnect order for Cox to port (D27275231) effective 08/31/00.
- 08/25/00 4:22 P.M. Qwest rejected FOC stating the disconnect order to port (D27275231) was canceled due to flow through cleanup by Qwest. Qwest also indicated on the LSR reject, that the customer's telephone number was disconnected.
- 08/28/00 Cox LNP (Local Number Portability) group notified it's Call Center that the porting phone install could not take place as a result of Qwest rejecting the request to port.
- 08/29/00 Cox faxed Qwest the "FOC followed by reject" per Qwest's request. Qwest indicated the information would be passed on to Qwest Manager (Terry Simmons) for follow up.
- 08/31/00 Cox Business Service team member spoke with customer porting to Cox and rescheduled phone install to 09/15/00.
- 09/08/00 12:00 P.M. Cox sent supplemental LSR (ID 1372805) to change the due date to 09/15/00.
- 09/21/00 Cox canceled the phone install order to port telephone number 480-675-8785. Cox customer comments from Cox indicate the customer had contacted Qwest and canceled any pending work orders.
- 10/04/00 Cox contacted Cox Business Service and advised Cox he did not want to port telephone number 480-675-8785 due to the fact he was now used to the Cox issued number.

Cox submitted an LSR (Local Service Request) to Qwest to request a port disconnect date for a pending Cox customer (telephone numbers 480-832-7105 and 480-832-6991). Cox received an FOC (Firm Order of Commitment) from Qwest. Although Qwest apparently subsequently rescinded the LSR, Cox Communications did not receive any LSR rejects from Qwest regarding the FOCs. The escalation took Cox nine business days to resolve the issue with Qwest.

- 06/20/00 3:14 P.M. Cox submitted an LSR through IMA (Interconnect Mediated Access) system requesting a port disconnect date of 07/03/00 for the telephone number 480-832-7105 LSR (ID 1160775).
- 6/20/00 3:33 P.M. Cox submitted an LSR (ID 1160874) requesting a port disconnect date of 07/03/00 for the telephone number 480-832-6991.
- 06/20/00 3:15 P.M. Qwest sent Cox an FOC to port telephone number 480-832-7105 on 07/03/00 per disconnect order (D15037236).
- 06/20/00 3:34 P.M. Qwest sent Cox an FOC to port telephone number 480-832-6991 on 07/03/00 per disconnect order (D15037247).
- 07/03/00 3:06 P.M. Cox activated telephone numbers 480-832-7105 and 480-832-6991.
- 08/21/00 3:20 P.M. Cox called the Qwest's Interconnect Call Center and spoke with Ellen to request an escalation ticket because the customer is still receiving bills from Qwest after the port. The escalation ticket is 451994.
- 08/21/00 5:15 P.M. Stephanie from Qwest's Denver Proactive Center called Cox and advised that the LSR orders to port were rejected because the customer called in to disconnect their telephone service with Qwest for 8/8/00.
- 08/24/00 1:40 P.M. Cox called the Qwest's call center and spoke with Geri and started a second ticket number 458120 in an effort to resolve the billing issue. Sue from Qwest's Denver Proactive Center called and stated they will research the account further and contact Cox back on 8/25/00 with resolution.
- 08/30/00 Sue from the Qwest escalations department called Cox requesting that Cox concur the telephone numbers 480-832-7105 and 480-832-6991 so Qwest could pull them back into Qwest's switch. Cox returned Sue's call 1-303-298-2643 and explained that Cox Communications did not receive any rejects as indicated by Qwest. Cox also explained the fact that Qwest concurred with Cox's port request.

- 09/01/00 Sue with Qwest's Denver Proactive Center left Cox a message stating the numbers were released from Qwest's switch and an order was opened to correct the customer's bill to back to 07/03/00.

B

Qwest was contacted to reschedule the port date prior to the FOC (Firm Order of Commitment) time frame of 8 P.M. MST (Mountain Standard Time). The Qwest disconnect order had already been completed causing the customer to lose dial tone with Qwest. Cox contacted Qwest to reconnect the customer's service in Qwest's system. Cox was required to submit a supplemental LSR (Local Service Request) to reestablish dial tone with Qwest. The telephone number in this example is 480-792-9497. As a result, the customer was without dial tone for one day.

- 10/05/00 6:46 P.M. Cox called Qwest's Call Center (1-888-796-9087) and spoke with Nita to reschedule the port date. She researched the account and saw that the order was already completed. The escalation ticket number is 519574.
- 10/05/00 6:53 P.M. Cox sent the LSR (ID 1474295) through IMA (Interconnect Mediated Access) to reconnect the customer's service.
- 10/05/00 6:59 P.M. Cox spoke with Angela and she stated she is working the escalation ticket and will call in the morning to get a new connect order typed. Her callback is 303-298-2210.
- 10/05/00 7:16 P.M. Cox tested the customer's line to verify service and Cox received the customer's answering machine.
- 10/06/00 10:06 A.M. Cox tested the customer's line to verify service and Cox received a disconnect message.
- 10/06/00 10:21 A.M. Cox called the Qwest's call center and spoke with Laura and explained yesterday's escalation ticket (519574). She transferred Cox directly to Angela. Angela gave Cox the "new connect order" number N01018487 and is calling assignments now. Customer's service should be back up by 5:00 P.M.
- 10/06/00 5:47 P.M. Cox tested the customer's line to verify service and got customer's answering machine.

Qwest's Interconnect Group at (1-888-796-9087) was contacted by Cox to change the port disconnect order (D27486941) date from 09/07/00 to 10/09/00 prior to the FOC (Firm Order Commitment) time frame of 8:00 P.M. MST (Mountain Standard Time). Cox received an FOC from Qwest indicating the porting disconnect date was changed to 10/09/00 as requested. Cox was later notified by the Qwest customer that dial tone was lost on telephone number 602-765-1614. As a result of the order entry error mentioned below the customer was without dial tone for one day.

- 09/07/00 2:06 P.M. Cox notified Nicole at Qwest's Interconnect Group (1-888-796-9087) to change Qwest's port order to disconnect due date. Nicole gave Cox escalation ticket number 476445 to change the porting disconnect date to 10/09/00.
- 09/07/00 7:10 P.M. Cox sent an LSR (Local Service Request) (ID 1370406) to change Qwest's port disconnect due date following the verbal called into Nicole at Qwest's Denver Proactive Center. Qwest's procedures indicates Cox must send a supplemental (LSR) by 12:00 noon the next business day.
- 09/14/00 4:55 P.M. Cox sent LSR (ID 1390272) to change the Cox porting date to 09/27/00.
- 09/18/00 Customer contacted Cox Call Center and advised she had no dial tone on telephone number 602-765-1614.
- 09/18/00 1:38 P.M. Cox spoke with Victoria at Qwest's Call Center who gave escalation ticket number 492099 to have service restored. Cox was then transferred to Qwest's Denver Proactive Center per Cox request. Laurie at Qwest's Denver Proactive Center advised Cox that Qwest incorrectly entered the requested port date of 09/27/00 as 09/17/00. Laurie at Qwest gave "new connect order" (N01016077) to have Qwest service restored on telephone number 602-765-1614.

Qwest was contacted to reschedule the port date prior to FOC (Firm Order of Commitment) due time frame of 8:00 P.M. MST (Mountain Standard Time). Cox contacted Qwest asking Qwest to change the Cox porting due date. The Qwest disconnect order to port to Cox (D15042720) was still completed by Qwest, and as a result the customer lost telephone service on telephone number 623-780-9601 for approximately one day.

- 08/25/00 Cox installer contacted Cox LNP (Local Number Portability) group to advise that the telephone install could not be fully completed due to incomplete facilities.
- 08/25/00 4:12 P.M. Cox contacted Debbie at Qwest's Interconnect Group at (1-888-796-9087) to advise Cox was not porting telephone number 623-780-9601 on 08/25/00 as requested. Debbie at Qwest typed escalation ticket 459914 to change Cox porting disconnect date per Cox request.
- 08/25/00 6:50 P.M. Cox sent an LSR (Local Service Request) (ID 1334611) to change port disconnect date after the verbal change due date was completed with Qwest.
- 08/26/00 Customer called Cox and advised dial tone was lost on telephone number 623-780-9601.
- 08/26/00 8:25 A.M. Cox test called telephone number 623-780-9601 and verified no dial tone as a result of Qwest completing the disconnect order to port.
- 08/26/00 8:36 A.M. Cox sent a supplemental LSR (ID 1334963) to restore telephone service with Qwest.
- 08/26/00 8:47 A.M. Cox sent a new LSR (ID 1334977) requesting a new port date. A new LSR was sent based off previous information from Qwest's Interconnect Group stating a new LSR must be sent to request a new porting date.
- 08/26/00 9:27 A.M. Cox spoke with Sue at Qwest's Denver Proactive Center. Cox explained that the customer porting to Cox lost dial tone even though steps were taken by Cox on 08/25/00 to stop the Qwest disconnect order from completing.
- 08/26/00 12:10 P.M. Sue from Qwest contacted Cox and advised that telephone number 623-780-9601 now has dial tone.
- 08/27/00 2:24 P.M. Cox contacted telephone number 623-780-9601 as a means of follow up to verify dial tone. Cox spoke with the customer porting to Cox and verified dial tone.

Qwest's Interconnect Group at (1-888-796-9087) was contacted by Cox to reschedule the port disconnect order (D15051461) date prior to FOC (Firm Order Commitment) due time frame of 8:00 P.M. MST (Mountain Standard Time). Qwest completed the disconnect order to port (D15051461), as a result the customer lost dial tone on telephone number 602-863-9709 for approximately one full day.

- 08/25/00 Cox installer contacted Cox LNP (Local Number Portability) group to advise the telephone install could not be completed due to additional facilities being required by Cox to complete the porting phone install.
- 08/25/00 4:13 P.M. Cox contacted Crystal at Qwest's Interconnect Group at (1-888-796-9087) to advise Qwest Cox was not porting telephone number 602-863-9709 on 08/25/00 as indicated. Crystal at Qwest gave escalation ticket number 459908 to change port disconnect date to 09/25/00 per Cox request.
- 08/25/00 7:36 P.M. Cox sent an LSR (Local Service Request) to change port disconnect date after completing a verbal change due date with Crystal at Qwest.
- 08/26/00 Customer called Cox call center advising Cox they lost dial tone on their phone.
- 08/26/00 1:03 P.M. Cox sent an LSR (ID 1334660) to restore telephone service for the customer.
- 08/26/00 1:04 P.M. Cox called telephone number 602-863-9709 and verified there was no dial tone.
- 08/26/00 1:17 P.M. Cox contacted Tiffany at Qwest's Interconnect Group about loss of dial tone to the customer. Tiffany at Qwest gave escalation ticket number 460273, Qwest transferred Cox to Qwest's Denver Proactive Center per Cox request.
- 08/26/00 1:17 P.M. Cox asked Qwest what steps would be required for Cox to receive a new porting date. Qwest advised Cox a complete new LSR was required by Cox requesting a new porting disconnect date.
- 08/26/00 1:23 P.M. Cox spoke with Angela at Qwest's Denver Proactive Center. Angela advised Cox that she would start a work back to restore telephone service for the customer and contact Cox to advise of status.

- 08/26/00 3:04 P.M. Cox contacted Qwest Interconnect Group at 1-888-796-9087 a second time as a result of not receiving a callback from Angela at Qwest. Cox spoke with William at Qwest's Interconnect Group. William advised Cox that ticket number 460273 was not completed right and advised me to call the Qwest duty pager at 1-303-201-4939 to get a resolution.
- 08/26/00 3:35 P.M. Cox contacted Laurie with Qwest repair at 1-800-223-7881 as a result of not receiving a response from Qwest after Cox paged Qwest's Denver Proactive duty pager. Laurie advised Cox that new connect order (N00970065) was issued by Qwest to restore Qwest service on telephone number 602-863-9709. Cox asked how long it would take to restore the telephone service, Laurie advised Cox the new connect order would be complete by 5:00 P.M. on 08/26/00.

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Qwest was notified by Cox to change the porting due date on disconnect order (D30948393) on 10/12/00. Cox's request to change the porting disconnect date was not completed by Qwest and as a result dial tone was lost on telephone number 623-582-0702 and 623-582-0714. Qwest shows inconsistency when requesting an LSR to restore dial tone for a customer.

- 10/12/00 9:20 A.M. Cox spoke with Laura at Qwest's Interconnect group to change porting disconnect date.
- 10/12/00 4:52 P.M. Cox sent an LSR (Local Service Request) to change porting date to reflect the verbal date requested.
- 10/13/00 5:07 P.M. Cox test called the telephone numbers and received a disconnect message.
- 10/13/00 5:09 P.M. Cox spoke with Nita at Qwest's Interconnect group in order to have dial tone restored. Nita gave escalation ticket number 528451 to have dial tone restored. Nita stated the disconnect order was completed because the escalation was called in too late.
- 10/13/00 5:17 P.M. Cox spoke with Carrie at Qwest's Denver Proactive Center. Carrie advised Cox she would call back with the "new connect" order. Carrie did not mention that a supplemental LSR for the "new connect" order was needed for the process to be completed.
- 10/13/00 5:37 P.M. Carrie at Qwest called Cox and left a message indicating a supplemental LSR was needed to start new connect process, Carrie also mentioned that Cox needed to call Qwest back on Saturday 10/14/00.
- 10/13/00 5:43 P.M. Cox called Qwest's call center back and spoke with Emily. Cox asked Emily if we could speak with Carrie. Emily stated that Carrie gave escalation ticket number 528451 to Kathy and that both Carrie and Kathy were gone for the day.
- 10/13/00 5:55 P.M. Cox spoke with Wanda at Qwest's Denver Proactive Center. Wanda verified the information and stated she would write up a paper ticket to restore dial tone, Wanda did not ask for supplemental LSR to be sent.
- 10/14/00 8:00 A.M. Cox spoke with customer and verified dial tone on both numbers.

Cox sent an LSR (Local Service Request) and called in a verbal change due date to Qwest on 10/14/00 to change the porting due date. The customer still lost dial tone on telephone number 480-892-4797 for two days as a result of Qwest completing the disconnect order to port. Qwest required an LSR from Cox to start the new connect order to restore dial tone, Qwest is inconsistent on this procedure as there have been several occasions where they do not require a supplemental LSR to restore dial tone.

- 10/14/00 11:52 A.M. Cox called Nita at Qwest's Interconnect group to change porting disconnect date. Nita gave escalation ticket number 532192 to change porting due date as requested.
- 10/14/00 2:34 P.M. (MST) Cox sent supplemental LSR (ID 1509528) following the verbal with Qwest to change the porting disconnect date.
- 10/15/00 Customer called Cox upset that dial tone was lost on their phone.
- 10/16/00 8:22 A.M. Cox test called telephone number 480-892-4797 from a Qwest telephone line and received a disconnect message.
- 10/16/00 8:24 A.M. Cox called Karen at Qwest's Interconnect group to request that dial tone be restored, Karen gave escalation ticket number 532778.
- 10/16/00 8:32 A.M. Cox spoke with Sue at Qwest's Denver Proactive Center. Sue stated she could not find ticket number 532192, which had been called in on 10/14/00. Sue advised Cox that a supplemental LSR must be submitted before a "new connect" process could take place.
- 10/16/00 8:43 A.M. Cox called Sue back with LSR (ID 1510849) so the "new connect" process could be started.
- 10/16/00 12:51 P.M. Sue called Cox to advise that dial tone had been restored in the Qwest switch. Cox made a test call from a Qwest telephone line and verified dial tone.

Qwest procedures continue to vary depending on whom you speak with. On Saturday 10/14/00 Cox notified Qwest to change the port due date for telephone number 480-218-7670 from 10/14/00 to 11/14/00. Customer lost dial tone on telephone number 480-218-7670 on 10/15/00 as a result of Qwest not working the escalation ticket. Qwest processed a new connect order to restore dial tone with out requiring a supplemental LSR (Local Service Request), as their process indicates.

- 10/14/00 11:51 A.M. Cox called Qwest and spoke with Nita, she gave escalation ticket number 532190 to change the porting disconnect date.
- 10/14/00 2:35 P.M. Cox sent LSR (ID 1509531) to change porting due date following the verbal change due date.
- 10/15/00 Customer contacted Cox Call Center and advised that dial tone was lost. Associate e-mailed Phoenix LNP (Local Number Portability) group with information.
- 10/16/00 8:23 A.M. Cox test called telephone number 480-218-7670 and verified no dial tone by getting a disconnect message.
- 10/16/00 9:07 A.M. Cox spoke with Tracy at Qwest, she advised that the customer lost dial tone because the ticket was not worked on Saturday. Qwest started a "new connect" order with out requiring a supplemental LSR as their procedures indicate.
- 10/16/00 11:54 A.M. Tracy called and advised that a new connect order (N32251482) was issued by Qwest to restore dial tone.
- 10/16/00 Cox test called to check for dial tone on three different occasions. Cox did not reach customer or an answering machine, but we did not receive a disconnect message and felt that Qwest had restored dial tone.

Customer lost dial tone on telephone number 602-843-0271 as a result of Qwest not working escalation ticket 532186 on 10/14/00. Qwest procedures indicate that a supplemental LSR (Local Service Request) must be sent to start a work back process. Qwest did not require a supplemental LSR to have this customer's telephone number restored.

- 10/14/00 11:49 A.M. Cox spoke with Nita at Qwest's Interconnect group to change porting due date on telephone number 602-843-0271. Nita gave escalation ticket number 532186 to change the porting disconnect date.
- 10/14/00 2:37 P.M. Cox sent supplemental LSR (ID 1509533) through IMA (Interconnect Mediated Access) to change the port disconnect date following the verbal request.
- 10/15/00 5:25 P.M. Customer contacted and was upset because dial tone was lost. Customer was advised that arrangements would be made to have dial tone restored on 10/16/00.
- 10/16/00 8:23 A.M. Cox test called customers number and received a disconnect message.
- 10/16/00 9:02 A.M. Cox spoke with Evita at Qwest. Evita advised Cox that the order completed due to Cox calling in the verbal change port date and sending the LSR on the same day of the porting disconnect date.
- 10/16/00 9:07 A.M. Cox spoke with Tracy at Qwest's Denver Proactive Center. Tracy reconfirmed the ticket that was called into Qwest on Saturday was not worked. Tracy did not ask for an LSR as Qwest normally does to start a work back process. Tracy worked the escalation to restore dial tone.
- 10/16/00 11:19 A.M. Tracy called Cox with Qwest's "new connect order" (N00981749) to have dial tone restored. Per Tracy the service will be restored by 5:00 P.M.
- 10/16/00 11:53 A.M. Cox made customer contact and verified dial tone.

Cox contacted Qwest to cancel a disconnect order to port (D31560783) prior to the committed port date of 10/07/00. Qwest required Cox to submit a supplemental LSR (Local Service Request) canceling the disconnect order before they would complete the verbal cancel. Cox explained that Qwest's procedures indicate a supplemental LSR must be sent by 12:00 P.M. the following business day. On this particular order Qwest advised the supplemental LSR was required before the verbal cancel would be done.

- 10/06/00 5:59 P.M. Cox spoke with Nita at Qwest's Interconnect group requesting to cancel the disconnect order to port. Nita gave escalation ticket number 521425 and transferred Cox to Qwest's Denver Proactive Center.
- 10/06/00 6:05 P.M. Cox spoke with Grace to cancel the disconnect order to port. Grace asked a Cox to send a supplemental LSR prior to her canceling the order to port. Cox let Grace know that an LSR would be sent after the phone conversation had ended. Grace stated she did not want to cancel the order to port prior to the supplemental LSR being sent. She further stated that they could get in trouble for doing this.
- 10/06/00 6:10 P.M. Diana proceeded to send supplemental LSR ID 1479255.
- 10/06/00 6:10 P.M. Cox Team Leader spoke with Grace asking documentation on LSR requirements if the procedure had changed. Grace asked Cox if they wanted to speak with her coach. Cox declined, stating this was not necessary at this time, but we would like documentation on the LSR requirement change.
- 10/06/00 6:20 P.M. Diana thanked Grace for her time and asked her to have her coach contact us concerning sending documentation on the change in the procedure that was requested. The call between Cox and Qwest ended abruptly before the conversation was completed.
- 10/06/00 6:25 P.M. Grace contacted Cox back. Diana asked her for her direct number in order that Cox Management could call and discuss the issue about inconsistency in process. Grace advised Diana that it was not necessary for Cox Management to contact her back.

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Qwest reassigned Cox telephone number 480-413-2090 to a Qwest customer. Cox customer was unable to receive calls from other Qwest customers. Once problem was identified, Cox spent 6 days trying to resolve the issue with Qwest. As a result of Qwest reassigning this number, the Cox customer choose to take a Cox issued telephone number of 480-699-0056 in place of telephone number 480-413-2090.

- 09/24/00 Cox customer contacted Cox Customer Care and scheduled a service repair ticket for 09/27/00 stating she was unable to receive calls from Qwest customers. Cox customer further advised the Customer Call Center that when her friends called they received a disconnect message.
- 09/26/00 Cox customer called back and gave more examples of telephone numbers she was not able to receive calls from. Cox customer scheduled another service call with Cox for 09/29/00 stating that if this issue can not be resolved she wants a new telephone number from Cox.
- 09/27/00 7:00 A.M. Cox Test Desk employee called Qwest after it appeared telephone number 602-413-2090 was reassigned to another Qwest customer.
- 09/28/00 10:13 A.M. Qwest contacted Cox and advised Cox that the problem on Qwest's side was identified. Qwest advised Cox that Qwest would submit paperwork to have telephone number 602-413-2090 released from the Qwest switch.
- 09/29/00 Cox spoke with customer as a means of follow up, Cox advised the customer that it appears Qwest gave her telephone number to another Qwest customer.
- 10/02/00 Cox customer called Cox and asked if the phone service issue was resolved. Customer service advised that it appeared it was fixed, but gave direct extension to call back if they still had problems.
- 10/04/00 Cox LNP received e-mail from a Cox Team Leader asking for assistance in changing Cox customer's telephone number.
- 10/04/00 1:25 P.M. Cox spoke with the Team Leader, who advised LNP that the Cox customer has opted to take a Cox issued telephone number. Customer stated to Cox Team Leader they wanted a message referring people calling telephone number 480-413-2090 to call new Cox issued number 480-699-0056. Cox LNP group advised the Team Leader that the referral message would not be available until Qwest released telephone number 480-413-2090 back to Cox.

- 10/04/00 Cox customer called back asking that the telephone number change with Cox be delayed until 10/05/00. Cox customer wanted time to notify friends that her telephone number was being changed.
- 10/05/00 Cox LNP group changed telephone number 480-413-2090 to 480-699-0056 per Cox customers request.

Qwest reassigned Cox telephone number 602-298-5600 to a Qwest customer. As a result of Qwest reassigning telephone number 602-298-5600, the Cox end user was unable to receive calls from Qwest customers. It took Cox Communications three days to resolve this issue with Qwest.

- 07/14/00 4:34 P.M. Cox spoke with Angela at Qwest's Denver Proactive Center and advised Qwest to release telephone number 602-298-5600, which belongs to a Cox customer. Angela advised Cox that she would work on a resolution and call back.
- 07/14/00 4:50 P.M. Cox received a call back from Angela advising a change order (C17828076) was issued by Qwest to change Qwest's customers telephone number. Angela advised Cox the change order issued by Qwest had a completion date of 07/19/00; Cox advised Angela this was an unacceptable time frame for resolution. Cox asked Angela to escalate this situation with Qwest management for a quicker resolution.
- 07/14/00 6:10 P.M. Cox called Angela for status on Qwest change order (C17828076), Angela advised she was unable to get in touch with a Qwest typist so she changed the due date of Qwest change order (C17828076) to 07/14/00. Angela advised Cox the change order would be completed with Qwest in the evening of 07/14/00.
- 07/15/00 11:51 A.M. Cox test called telephone number 602-298-5600 belonging to a Cox customer from a Qwest telephone line, Cox was not able to contact our customer (Silver Creek Apartments) from a Qwest telephone line. Cox called the customer (Silver Creek Apartments) from a Cox telephone line and received an answer machine for Silver Creek Apartments.
- 07/15/00 11:51 A.M. Cox called the Qwest Interconnect Center and put in escalation ticket # 399812. Cox was transferred to Brian at Qwest's Denver Proactive Center. Brian advised Cox he would research and call back with information.
- 07/15/00 12:28 P.M. Cox did not receive feedback from Brian from Qwest's Denver Proactive Center. Cox called the Qwest repair center and spoke with Jacque. Jacque stated there were notes from a Qwest manager advising a Qwest change order (C17828706) was to be completed 07/17/00. Angela transferred Cox to Brian at Qwest's Proactive Center. Brian advised Cox he is rescheduling the due date of the change order from 07/17/00 to 07/15/00.
- 07/15/00 1:50 P.M. Brian called Cox and advised the change order (C17828706) could not be done due to the fact the Cox telephone number reassigned by Qwest to a different end user is a Qwest ISDN

(Internet) line. Brian advised Cox that, for Qwest to change their customers telephone number a Qwest technician would need to go to the location. Brian advised Cox to call the Qwest duty pager at 1-303-201-4939 for resolution.

- 07/15/00 1:50 P.M. Cox paged Qwest duty pager, Cox received no response.
- 07/15/00 2:20 P.M. Cox paged Terry Simmons (Qwest Team Leader) no response received.
- 07/15/00 3:22 P.M. Cox paged Ken Beck (Qwest Director) no response received.
- 07/15/00 4:34 P.M. Cox left message for Ken Beck, no response received.
- 07/17/00 2:20 P.M. Cox received a call from Ken Beck, Ken advised he would look at this situation on Monday 07/18/00.
- 07/18/00 9:00 A.M. Geri (Ken Beck's Assistant) called and advised the change order with Qwest was completed.

Qwest reassigned Cox telephone number 480-857-7400 to a Qwest customer. As a result of Qwest reassigning telephone number 480-857-7400, Cox end user was unable to receive business calls from Qwest customers. It took Cox Communications 3 days to resolve this issue with Qwest.

- 07/05/00 1:16 P.M. Cox spoke with Jerry at Qwest's call center. Jerry advised Cox that they did not release telephone number 480-857-7400 to a Qwest customer.
- 07/05/00 4:16 P.M. Cox spoke with it's customer (Arizona Birth Buddies) to gather additional information based off of response from Qwest.
- 07/06/00 10:51 A.M. Cox spoke with Dia at Qwest's call center. Dia advised Cox that "change telephone order" for Qwest customer (NBA Solutions) will be completed on 07/07/00 by 7:00 P.M.
- 07/06/00 Cox spoke with Bruce at Qwest's business office as a result of the Customer (Arizona Birth Buddies) contacting Cox advising a disconnect message is now received when telephone number 602-857-7400 is called from a Qwest telephone. Bruce transferred Cox to Mark (Qwest Vendor service employee), Mark then transferred Cox to Qwest residential repair. Vicky at Qwest's residential repair gave service order repair ticket 480-857-7400.
- 07/06/00 5:25 P.M. Cox contacted the Qwest residential repair call center for an update. Qwest advised Cox that service order repair ticket 480-857-7400 was being worked as a priority. Qwest call center advised Cox that service order ticket 4808577400 had an estimated completion time by 7:00 P.M. on 07/07/00. Qwest advised Cox they would call back with an update on the status of the Qwest service order ticket once additional information was available.
- 07/07/00 1:53 P.M. Cox called it's customer (Arizona Birth Buddies) and verified calls can now be received from Qwest customers.
- 07/25/00 Cox brought this matter to the attention of Qwest in a local meeting located in Phoenix, Arizona. It was suggested by Qwest time that Cox 3-mail the information to Qwest so the information could be delegated to the appropriate department at Qwest for compensation purposes.
- 08/04/00 7:46 A.M. Information about telephone umber 480-857-7400 was e-mailed to Qwest at their request on 07/25/00.