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Arizona Corporation Commission

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IN THE MATTER OF QWEST
CORPORATION'S COMPLIANCE WITH
§ 271 OF THE TELECOMMUNICATIONS
ACT OF 1996

Docket No. T-00000A-97-0238

**QWEST CORPORATION'S STATUS
REPORT REGARDING
IMPLEMENTATION OF
RECOMMENDATIONS IN OSS ORDER**

Qwest Corporation ("Qwest") respectfully submits this report ("Report) regarding its implementation of the Arizona Corporation Commission (the "Commission" or "ACC") Staff's recommendations in the Commission's September 13, 2003 Supplemental Order relating to Qwest's Operations Support Systems ("OSS") and Checklist Item 1 and 2 compliance.¹

The Supplemental Order provides that Qwest must show that it has implemented Staff's recommendations regarding OSS and Checklist Item 1 and 2 issues.² Qwest submits as Exhibit A a table describing the actions Qwest has taken to implement those recommendations. As set forth in the table, Qwest had already implemented all of the recommendations except for a single recommendation that allowed Qwest a year for

¹ Order, *In the Matter of U S WEST Communications, Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, ACC Docket No. T-00000A-97-0238, Decision No. 66242 (Sept. 16, 2003) ("Supplemental Order").

² Order at ¶¶ 52, 138.

1 implementation. Qwest is in the process of implementing that recommendation, which
2 relates to a test of Qwest's Daily Usage File ("DUF"). The DUF test is currently
3 underway and is scheduled to be completed by the end of the year.

4 RESPECTFULLY SUBMITTED this 30th day of November, 2004.

6 QWEST SERVICES CORPORATION

7
8 BY: 

9 Norman G. Curtright
10 4041 North Central Avenue
11 Suite 1100
12 Phoenix, AZ 85012
13 (602) 630-2187 (phone)
14 (602) 235-3107 (fax)

15 and

16 Elizabeth A. Woodcock
17 Perkins Coie LLP
18 1899 Wynkoop Street, Suite 700
19 Denver, Colorado 80202
20 Telephone: (303) 291-2316
21 Facsimile: (303) 291-2400
22 ewoodcock@perkinscoie.com

23 *Attorneys for Qwest Corporation*

24 ORIGINAL and 13 copies hand-delivered for
25 filing this 30th day of November, 2004 to:

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

1 COPY of the foregoing hand delivered
2 this 30th day of November, 2004 to:

3 Maureen A. Scott, Esq.
4 Legal Division
5 ARIZONA CORPORATION COMMISSION
6 1200 W. Washington St.
7 Phoenix, AZ 85007

8 Ernest G. Johnson, Director
9 Utilities Division
10 ARIZONA CORPORATION COMMISSION
11 1200 W. Washington St.
12 Phoenix, AZ 85007

13 Lyn Farmer, Chief Administrative Law Judge
14 Jane Rodda, Administrative Law Judge
15 Hearing Division
16 ARIZONA CORPORATION COMMISSION
17 1200 W. Washington
18 Phoenix, AZ 85007

19 COPY of the foregoing served electronically
20 this 30th day of November, 2004 to:

21
22
23
24
25
26

A handwritten signature in black ink, consisting of several loops and a horizontal line at the end, positioned above a solid horizontal line.

EXHIBIT A

**SUPPLEMENTAL ORDER ON CHECKLIST ITEM NO. 1 AND 2
DECISION NO. 66242, DATED SEPTEMBER 16, 2003
OSS AND CHECKLIST ITEM ISSUES**

<u>IMPASSE ISSUE</u>	<u>ACTION ITEM</u>	<u>STATUS</u>
OSS ISSUES		
Disputed Issue No. 1 – Service Affecting Performance and Reporting	<p>Provide ACC copy of finalized OP-5 PID language.</p> <p>Provide ACC copy of finalized PO-20 PID language.</p> <p>OP-3 Staff agreed with Qwest that OP-3 is not the place to measure trouble reports due to service order errors by Qwest and that this issue is resolved with Staff's resolution of OP-5</p> <p>Demonstrate system created discrepancies found by CGE&Y and other problems discussed above have been corrected which should include comparison with old method of calculating OP-5 for review by the parties.</p> <p>Withholding 271 approval – Staff agreed with Qwest there is no legal requirement or justification for withholding 271 approval until LTPA group created and ACC involved in its activities.</p>	<p>Completed - Final OP-5 PID language filed in 8-29-03 SGAT filing</p> <p>Completed - See Page 9 of Qwest's comments filed on March 10, 2003</p> <p>Completed – no action required</p> <p>Completed – March 10, 2003 (Part of Qwest comments filed regarding Staff's Report on the July 30-31 Workshop)</p> <p>Completed – no action required</p>
Disputed Issue No. 2 – Time Consuming and Cumbersome Ordering Process	Qwest file verification that IMA 12.0 implemented changes allowing UNE-P conversions as specified and migrates by	Completed - Verification filed June 10, 2003

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	telephone number	
Disputed Issue No. 3 - Cutovers	Qwest should be required to show that it is providing timely cutovers and complying with its own documented procedures.	Completed - Resolved through CMP CR PC061002-1 effective September 25, 2002 which initiated change from telephone to e-mail no dial tone notices.
Disputed Issue No. 4 – Unannounced CLEC Affecting System Changes	Changes to processes should not be made without CLEC notification.	Completed - CGE&Y follow-up found that Qwest was following procedures on CLEC notifications concerning system changes.
Disputed Issue No. 5 – OSS Lack of Flow Through (Centrex Plus and Centron orders)	<p>Within 90 days implement and advise ACC of process to monitor on proactive basis that when connect order falls out for manual handling there is immediate response to restore service.</p> <p>Post process on PCAT website and notify CLECs.</p> <p>Revised process and its effectiveness reviewed in first six-month PAP review.</p>	Completed – March 10, 2003 (Part of Qwest comments filed regarding Staff’s Report on the July 30-31 Workshop)
Disputed Issue No. 6 – Maintenance and Repair: Authorization and Accuracy For Closing Tickets	Provide filing prior to the first six-month PAP review on findings of its review and efforts to improve disposition coding accuracy.	Completed – Qwest continues to conduct quarterly audits on coding accuracy. November 2004
Disputed Issue No. 7 – Billing	Embedded UNE-E customer base.	Completed June 30, 2004 -

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Accuracy	<p>Count each bill for which manual adjustment required as an inaccurate bill or an error for purposes of calculating its billing measurements until conversion occurs.</p> <p>Can exclude from PID calculation if can demonstrate to Staff that Eschelon is unreasonably preventing conversion.</p>	Embedded Eschelon customer base converted.
Disputed Issue No. 8 –Switched Access	DUF Retest	Test underway – will be completed by end of year 2004.
Decision No. 66242 – Page 15, Paragraph 52, lines 6-13	<p>With Staff's recommendations contained in its Final Supplemental Workshop Report on OSS issues and the recommendations contained herein regarding the resolution of all OSS issues, Staff believes that all outstanding OSS issues raised in the Supplemental Workshop have now been resolved. Qwest should be required to provide evidence that it has implemented Staff's recommendations. This evidence and the effectiveness of the recommendations will be reviewed at the first six-month PAP review.</p>	Completed – Report regarding implementation of Staff's recommendations filed November 30, 2004.
NON OSS ISSUES		
Disputed Issue No. 1 – UNE-P Feature Availability: Remote Access Forwarding	Immediately make available on UNE-P AIN features Remote Access Forwarding, Scheduled	Completed – Language incorporated in SCAT filed 8-29-03

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	<p>Forwarding, Dial Lock and Do No Disturb as well as Voice Mail</p> <p>Display list of unavailable features with UNE-P with USOCs and language description.</p> <p>Allowed to charge CLECs right to use fees for activating an AIN feature. Revise SGAT Section 9.11.1.3.2 to read: "Shared Right-To-Use Fees for Switched-Based Features – allows two (2) or more Carriers (including Qwest) to share the applicable Right-To-Use Fees for Switched-Based Features. Under a sharing arrangement one (1) CLEC obtains a Switch-Based Feature from Qwest pursuant to this Agreement or an approved Interconnection Agreement, and another CLEC pursuant to the terms of its Agreement or approved Interconnection Agreement, may share the applicable Right-To-Use Fees equally between the requesting Carriers. Shared Right-to-Use Fees may also be established through joint Application by CLECs in which Qwest will have separate Billing relationships with each applicant and will look to each CLEC for payment of its proportionate share of the Right-To-Use Fees relating to the</p>	<p>Features/Service Not Available Table published in PCAT and posted to website on 9-24-03</p> <p>SGAT filed 8-29-03 included all resolved items from 271 workshops in Arizona.</p> <p>Decision No. 66242 issued September 16, 2003 found in favor of Staff's recommendation regarding language for Section 9.11.1.3.2 regarding the mechanism for CLECs to request additional switch features as well as how the Right to use fees could be shared if more than one CLEC wanted the functionality.</p> <p>Qwest filed its TRO compliant SGAT including ACC ordered 9.11.1.3.2 language, February 2004.</p> <p>To address concerns about addressing the issues in the filed SGAT with the uncertainty surrounding the TRO, Qwest withdrew TRO compliant SGAT including ACC ordered 9.11.1.3.2 language, March 2004</p> <p>While the language was pulled</p>
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<p>Employee Training</p>	<p>Switch-Based Feature. For the first twenty-four (24) months after an initial request Qwest will prorate the Right-To-Use Fees for providing the Feature regardless of how many Carriers actually utilize the feature by determining the total applicable Right-To-Use Fees for provisioning the Feature and allocating equally that fee to all sharing Carriers (and billed directly to each such Carrier). Qwest shall not place unreasonable restrictions on CLEC's ability to make use of this arrangement.</p> <p>Certify that front-line employees who interface with CLECs on end-user affecting issues trained appropriately.</p>	<p>from the SGAT, that language appears in the PCAT at the following URL: http://www.qwest.com/wholesale/pcat/unswitch.html. Also, Qwest did, and continues to, have a Special Request process in place to receive requests from CLECs for features or functionality not currently turned up in a switch.</p> <p>To date, no such requests have been received from CLECs for such additional features or functionality.</p> <p>The two previous years of Qwest SR information is available for review in the SRP Notification Log which can be accessed at http://www.qwest.com/wholesale/preorder/bfrsrprocess.html</p> <p>The process documentation appears at http://www.qwest.com/wholesale/pcat/unswitch.htm</p> <p>Completed October 13, 2003</p>
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	<p>Implement streamlined complaint process that allows CLECs to escalate any issue, at any time, to any escalation point.</p> <p>Utilize relationship management survey to obtain CLEC input on Qwest's CLECs performance. CLECs shall have input to survey processes and the topics to be covered in CLEC survey. If Qwest utilizes its broader customer satisfaction survey, CLECs shall be given the option of submitting additional comment in writing. If Qwest decides to use the CMP process, decisions shall be made by a two-thirds vote or by independent third party consultant.</p>	<p>Completed October 13, 2003</p> <p>September 24, 2004 - CLECs notified that feedback form available at http://www.qwest.com/wholesale/azclecfeedback.html</p> <p>Survey conducted October 18, 2004 to November 2, 2004.</p> <p>Survey results will be posted to website no later than December 20, 2004. NOTE: Only one CLEC (MCImetro) provided feedback for use in the survey.</p>
<p>Disputed Issue No. 2 – Unannounced Dispatches</p>	<p>Create matrix outlining process and post on website in Maintenance and Repair PCAT.</p>	<p>Completed – Provided link to the document in the PCAT on 8-6-03</p>
<p>Disputed Issue No. 3 – DSL: Disconnect in Error</p>	<p>Repair interval should be used to restore service. Commitment should be documented in Qwest's repair process procedures in the PCAT.</p>	<p>Completed 10-31-03</p>

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<p>Disputed Issue No. 4 – DSL: Disconnect DSL Early (Before Voice)</p>	<p>Qwest should be required to leave DSL functional until the time of cut requested by CLEC (and not earlier).</p>	<p>Completed – Through CMP, internal DSL system change implemented on 12-17-02 that resolved this issue.</p>
<p>Disputed Issue No. 5 – Maintenance and Repair: Discrimination</p>	<p>Provide statement of time and materials and applicable charges to CLECs at the time maintenance and repair work is completed (as Qwest does with retail customers.)</p> <p>Qwest implemented CR on 6-25-03 and updated PCAT to include process.</p>	<p>Completed (CR# PC070202-2X). This was originally a systems CR and crossed over to product/process CR because resolution finally was a web based tool rather than CLEC facing system. Although tool was deployed in June 2003, Eschelon continued to ask questions and raise issues resulting in updates to documentation, etc., and the CR remained open. At a February 18, 2004 project meeting Eschelon agreed that the CR could be closed. CR completed on February 18, 2004.</p>
<p>Disputed Issue No. 6 – Maintenance and Repair: Untimely Bills</p>	<p>Institute a policy not to process maintenance and repair charges that cannot be posted by the second bill cycle after the maintenance and repair occurred satisfies Staff's recommendation.</p>	<p>Completed 10-27-03</p>
<p>Disputed Issue No. 7 – Maintenance and Repair: Insufficient Information in Bills</p>	<p>Qwest should be required to provide the circuit identification number on unbundled loop bills for maintenance and repair charges.</p>	<p>Completed – CR resolving this issue implemented on 3-17-03.</p>

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<p>Disputed Issue No. 8 – Maintenance and Repair: Pair Gain</p>	<p>Qwest should not be allowed to impose upon CLECs dispatch charges before ensured that the loop is working from its equipment to the pair gain.</p> <p>CR implemented on 6-25-03 and PCAT updated. However, Eschelon contended deployment not successful and CR remained open until February 18, 2004.</p>	<p>Completed: The path to the PCA7 paragraph is: http://www.qwest.com/wholesale/pcat/unloop.html</p> <p>Completed – CR closed on February 18, 2004.</p>
<p>Disputed Issue No. 9 – Maintenance and Repair: Reciprocity</p>	<p>Qwest should be required to accept charges from CLECs for testing that CLECs conduct for Qwest in the same types of circumstances under which Qwest charges CLECS.</p>	<p>Completed – Staff agreed with Qwest that trouble isolation for a CLEC customer is a CLEC responsibility as stated in agreed upon SGAT language.</p>
<p>Disputed Issue No. 10 – Loss and Completion Reports</p>	<p>CLEC should be notified when customer is lost.</p> <p>CR (SCR093002-01) issued by Eschelon following CMP process. Keep Commission apprised of the progress on the open action item in CMP, the change promised to implement by month's end and the extent to which CLECs concerns have been met.</p>	<p>Completed – CR implemented on 7-17-03.</p>
<p>Disputed Issue No. 11 – Policy of Not Applying Rates in Interconnection Agreements</p>	<p>Page 30, Paragraph 108: To the extent unapproved rates are contained in Qwest's SGAT, Staff believes that they would be</p>	<p>Completed – Complying with order</p>

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	<p>considered interim and subject to true up once the Commission approves final rates. However, Staff does not believe that there should be any rates in the SGAT that Qwest has not separately filed with the Commission, along with cost support, for prior review and approval. To allow Qwest to simply put rates into effect, without the agreement of the CLEC in a particular case through a negotiated interconnection agreement, could be a great impediment to competition.</p>	
<p>Disputed Issue No. 12 - Collocation</p>	<p>Qwest should demonstrate that its documented processes for ensuring that CLEC collocation equipment is protected during construction activities have been tested and proven successful.</p> <p>Language should be added to the SGAT requiring Qwest to pay for clean up costs when construction results in dust contamination to CLEC equipment and language should be reciprocal.</p> <p>Qwest should be required to provide CLECs final Alternative Point of Termination ("APOT") information at least 15 days before a collocation ready for service ("RFS") date so that CLECs are</p>	<p>Completed – The effective date of the updated Tech Pub No. 77350 was April 10, 2003.</p> <p>Completed – Language incorporated in SGAT Section 8.2.1.8 filed on 8-29-03</p> <p>Completed – Staff agreed with Qwest that providing final APOT 15 days early reduces 90 day interval allowed for Qwest to complete collocation and that Qwest's agreement to provide</p>

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	<p>able to place orders early enough to enable them to use their collocations on the RFS date.</p> <p>Qwest should not be permitted to charge CLECs a maximum price of \$345 for all collocation augment quote preparations including for minor activity of terminating unused power.</p> <p>Qwest should provide an objective and reasonable definition of what constitutes a "material change" to a collocation order to that Qwest cannot unilaterally delay a CLEC's collocation order when a minor, non-material change is required by a CLEC.</p> <p>Qwest should be required to demonstrate that it has a process in place to provide CLECs with timely and accurate information informing them when collocation space becomes available at a Qwest premises.</p> <p>Qwest should be required to charge CLECs rates contained in parties' interconnection agreement for collocation space rather than SGAT rates.</p>	<p>preliminary APOT was reasonable.</p> <p>Completed – Staff agreed fee should be cost based and should be raised in Phase III of the cost docket.</p> <p>Completed – SGAT language addressing this issue agreed to in all states' 271 workshops. Eschelon did not propose any alternate language – Staff agreed with AT&T that SGAT language should not be changed.</p> <p>Completed through CMP on decommissioning collocation space and transfers of responsibility and in September 2002, Qwest began posting a collocation available space inventory on its website.</p> <p>Completed – rates in the parties' interconnection agreements should be utilized. If there are no rates agreed to in an interconnection agreement for certain services, then SGAT which contains</p>
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	<p>Qwest should be required to provide CLECs with adjacent off-site collocation and should change SGAT language.</p> <p>Qwest should be required to permit CLECs to interconnect at the Intermediate Combined Distribution Frame ("ICDF").</p>	<p>Commission approved rates should be utilized.</p> <p>Completed – Staff agreed Qwest has met its obligations under FCC orders and rules.</p> <p>Completed through implementation of CR which allowed for termination of Local Interconnection Services ("LIS") at the ICDF, with PCAT updated on October 11, 2002.</p>
<p>Disputed Issue No. 13 - Interconnection</p>	<p>Delete SGAT section that permits Qwest to charge transit charges in addition to access charges on intraLATA toll calls.</p> <p>Qwest should not be permitted to charge CLECs for incomplete or old Category 11 billing records and proposed a definition of a billable record that Qwest agreed to add to the SGAT.</p> <p>Qwest should not be permitted to charge CLECs an assumed tandem switching and tandem transmission mileage rate.</p>	<p>Completed – Staff stated this issue should be resolved in a cost docket proceeding.</p> <p>Completed – definition of Billable Record added to SGAT, Section 4.19.1 in 8-29-03 SGAT filing.</p> <p>Word "billable" added before word "record" in SGAT Sections 7.5.4 and 7.6.3 in 8-29-03 SGAT filing.</p> <p>Completed – Staff agreed with Qwest and AT&T that current SGAT language is appropriate and workable.</p>

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<p>Disputed Issue No. 14 – Tandem Failure Events</p>	<p>Qwest should be required to provide non-confidential documentation to show there was a tandem failure event.</p>	<p>Completed – Staff agreed that Qwest provides proper CLEC notification and Qwest also agreed to provide root cause analysis information.</p>
<p>Decision No. 66242- Page 37, Paragraph 138, lines 15-19</p>	<p>With Staff's recommendations as to the resolution of all Checklist Item impasse issues as described above, Staff believes that all outstanding Checklist Item issues raised in the Supplemental Workshop have now been resolved. Qwest should be required to provide evidence that it has implemented Staff's recommendations. This evidence and the effectiveness of the recommendations will be reviewed at the first six-month PAP review.</p>	<p>Completed – Report regarding implementation of Staff's recommendations filed November 30, 2004.</p>