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

**Docket No. T-00000A-97-0238**

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**AT&T'S COMMENTS ON QWEST'S STATUS REPORT  
REGARDING THE CHANGE MANAGEMENT  
PROCESS REDESIGN**

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AT&T Communications of the Mountain States, Inc. and AT&T Local Services on behalf of TCG Phoenix, (collectively, "AT&T") hereby submit these Comments on Qwest's Status Report Regarding the Change Management Process Redesign ("Status Report").

**COMMENT**

**I. BACKGROUND**

Generally, Qwest's Change Management Process ("CMP"), like those of Verizon and SBC Communications, has as its objective the establishment of a process to manage and communicate changes to Operational Support Systems ("OSS"), the related OSS interfaces, products, processes and documents that affect or are likely to affect local competitors and other carriers reliant upon Qwest as a supplier of interconnection or

access services (including inter-exchange carriers or “IXCs”). The importance of an effective and efficient CMP to all the parties involved cannot be overstated; competition and interoperable carrier systems and transactions depend upon it.

In addition to the basic objective, Qwest committed, during the § 271 workshops, to take certain substantive issues out of the workshops to be addressed in CMP.<sup>1</sup> Many of these issues included the more technical “piece parts” of Qwest’s § 271 obligations along with the needed redesign of the CMP framework itself to make CMP better meet its objectives. Thus, CMP—in Qwest’s case—has two goals: (1) to address substantive technical-type issues from both the day-to-day business operations of the parties and certain § 271 workshop items; and (2) to address the CMP redesign such that it will become compliant with Qwest’s § 271 obligations.<sup>2</sup>

To fully understand the issues associated with Qwest’s CMP and the need for its redesign, one must first understand: (a) the legal standard required for CMP § 271 compliance; (b) the original CMP issues giving rise to the need for its redesign; and (c) the purpose of Qwest’s Status Reports and how they ought to be handled procedurally by the Commission.

**A. The Legal Standard for CMP Compliance with § 271.**

In accordance with § 271, the FCC has outlined five elements of a Regional Bell Operating Company’s (“RBOC’s”) change management process that are required before

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<sup>1</sup> AT&T has attached to these Comments a catalog of the various issues that were “punted” from the § 271 workshops to be addressed in the CMP forum. As part of the § 271 investigation, the Commission should ensure that each of these issues had indeed been addressed and resolved in CMP.

<sup>2</sup> For purposes of clarity, this Response will refer to “CMP re-design” and the “CMP forum”. The distinction between these terms is that CMP re-design has to do with the process the CLECs and Qwest are involved in to re-design the CMP. CMP Forum refers to the (currently) monthly CMP meetings where Qwest and CLECs meet to address substantive matters that fall under CMP, such as change requests relating to systems (OSS), product and process.

the change management plan can be considered adequate to afford an efficient competitor a meaningful opportunity to compete:<sup>3</sup>

(1) that information relating to the change management process is clearly organized and readily accessible to competing carriers; (2) that competing carriers had substantial input in the design and continued operation of the change management process; (3) that the change management plan defines a procedure for the timely resolution of change management disputes; (4) the availability of a stable testing environment that mirrors production; and (5) the efficacy of the documentation the BOC makes available for the purpose of building an electronic gateway.

Assuming an RBOC is able to demonstrate that its plan meets these requirements, it must then demonstrate a pattern of compliance with its plan.<sup>4</sup> Since many of the re-designed elements of CMP are brand new or yet to be developed, the Commission cannot determine Qwest's compliance or lack thereof until it can ensure that Qwest's plans are: (i) implemented, (ii) consistent with the determinations made in the redesign process, and (iii) operational for a sufficient period of time to establish a pattern of actual compliance.

Qwest cannot demonstrate, as yet, its compliance. Nor can any Commission, as yet, conduct much of an investigation. In fact to conduct any real investigation of Qwest's CMP, the CMP must be complete and functioning.

**B. The Original CMP and the Need for its Redesign.**

During the General Terms and Conditions workshops ("GT&Cs"), Qwest filed testimony regarding Change Management as part of its testimony alleging § 271

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<sup>3</sup> *In the Matter of Application by SBC Communications Inc., Southwestern Bell Telephone Company and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 To Provide In-Region, InterLATA Services In Texas*, Memorandum Opinion and Order, CC Docket No. 00-65, FCC 00-238 (Rel. June 30, 2000) at ¶ 108 (hereinafter "*SWBT Texas 271 Order*").

<sup>4</sup> *Id.*

compliance. AT&T<sup>5</sup> and other CLECs filed responsive affidavits that identified several areas of concern and deficiencies in Qwest's then-current CMP process; likewise, the workshop exhibit produced by AT&T indicated, using Qwest's own documentation, that Qwest's CMP process was not, in fact, sufficiently responsive to the CLECs' needs and it was a very ineffective tool for the management of change.<sup>6</sup>

In contrast, Qwest states in its Status Report<sup>7</sup> that it "proposed that the CLEC community participate in the redesign of the CMP to address key concerns regarding the process raised in the section 271 workshops regarding Qwest's change management process." While this may be part of Qwest's motivation, it is important to understand that in February 2001 Qwest's CMP had received criticism, not only from the CLEC community, but also from Cap Gemini Ernst & Young ("CGE&Y") in the Arizona third party evaluation. CGE&Y submitted a formal criticism, in the form of an Incident Work Order ("IWO")<sup>8</sup>, of Qwest's change management process on February 19, 2001, stating that Qwest's CMP "is not a true collaborative effort for making changes to the CLEC-specific pre-order, order, and repair interfaces." See IWO 1075 as **Exhibit A**, attached hereto. CGE&Y issued a further criticism on February 20, 2001<sup>9</sup> stating that "the Change Request (CR) process used in the CICMP needs to be reviewed and re-designed in order for CRs to progress through the lifecycle in a much more timely fashion."<sup>10</sup> See IWO 1076 attached hereto as **Exhibit B**. This particular IWO states that the time it takes to

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<sup>5</sup> Supporting Affidavit of John F. Finnegan Regarding workshop, Exhibit 6 ATT 3.

<sup>6</sup> See Exhibit 6 ATT 5.

<sup>7</sup> See Report at p. 2.

<sup>8</sup> Arizona Incident Work Order (IWO) 1075 attached as Exhibit A.

<sup>9</sup> Arizona IWO 1076 attached as Exhibit B.

<sup>10</sup> The CR process is the process by which a CLEC may submit a request to affect a change to systems, products or processes that are used by Qwest and CLECs to conduct business.

process a CR is “simply too long.” Further, the time it took for a CR to make it into a release was longer still. Thus, these among other concerns of CGE&Y, proved consistent with the CLEC experience described in the § 271 workshops.

In each of these IWOs, CGE&Y indicates that CMP redesign is underway but states that it is premature to close the IWOs. AT&T has attached additional IWOs and Exceptions from the ROC process<sup>11</sup> that describe the difficulties with Qwest’s then-current CMP and the problems they encountered. *See Exhibit C.*

It is clear that as early as February 2001, Qwest was aware that there were significant problems with its CMP. Because there were criticisms not just from CLECs, but also from the third party testers, Qwest was on notice that these problems would affect its application under § 271 of the Telecommunications Act of 1996 (the “Act”). In spite of these warnings, Qwest waited until June 2001 to propose to CLECs that they engage in an extensive collaborative design process with Qwest.<sup>12</sup>

In fact, the kick-off meeting for CMP redesign did not take place until July 11, 2001.<sup>13</sup> As a result of this late start, Qwest has attempted to push a very aggressive schedule for CMP redesign. CLECs have been meeting with Qwest an average of four full days each month on CMP redesign alone. This is in addition to CLECs’ attendance at monthly CMP Forum meetings and other calls and meetings relating to the CMP work generally. For the people involved in CMP meetings, this amounts to more than twenty-five percent of their work time each month devoted to CMP (not counting preparation time outside of these meetings).

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<sup>11</sup> Exceptions are used in the ROC evaluation to identify areas in Qwest’s systems or processes that require correction. The ROC exceptions are more recent than those prepared by CGE&Y.

<sup>12</sup> 6/15/01 Arizona Tr. at pp. 1161 – 1162.

<sup>13</sup> Exhibit B to Qwest’s Status Report.

Despite the extraordinary devotion of time to Qwest's objectives, the Commission should not place tremendous reliance upon Qwest's redesign schedules. Qwest included, as Exhibit D to the Status Report, a schedule of CMP redesign meetings showing gatherings through the end of the year. It is highly likely that additional meetings will need to be added to accomplish all of the listed tasks, not to mention the yet undisclosed additional tasks that may be identified through the redesign process itself. For example, for the October 16, 2001 redesign meeting, the schedule called for three items to be addressed: (i) Change Request Initiation (CLEC and Qwest); (ii) Changes to an existing interface (application-to-application and graphical user interface; and (iii) Prioritization of OSS Change Requests. At that meeting, only one of the three topics was discussed—changes to an existing interface. In the CMP redesign meetings, CLECs have criticized Qwest for trying to push an aggressive schedule because it meets Qwest's purpose in obtaining § 271 approval, while CLECs have asked for changes to CMP for over a year with little response until now.<sup>14</sup>

Based on all of the foregoing, it is clear that the current CMP process is deficient and a new CMP is not only under construction, so to speak, but absolutely necessary. Thus, a complete re-design developed through collaboration with CLECs is essential for the success of Qwest's § 271 application related to its CMP.

**C. The Purpose of Qwest's Status Report and the Procedural Confusion.**

AT&T first became aware that Qwest would file this status report regarding CMP redesign at the GT&C workshop in Colorado on August 22, 2001,<sup>15</sup> months after

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<sup>14</sup> See Qwest Report, Exhibit B, Final Meeting Notes, July 19, 2001, p. 5, "Additional CLEC Comments on Draft 7/19 Re-Design Session." See also, Qwest Report, Exhibit B, Draft Meeting Minutes, September 5 and 6, 2001, at p. 5.

<sup>15</sup> 8/22/01 Colorado Tr. at p. 289.

numerous GT&C workshops had taken place in other jurisdictions. Nevertheless, in Colorado Mr. Crain for Qwest stated:

Mr. Crain: The significant issues that have been raised in testimony and raised in these workshops will be addressed in time to make a filing -- will be resolved, I believe, in time to make a filing the first week of October.<sup>16</sup>

\* \* \*

Mr. Crain: It's my anticipation that that filing, and then possibly periodic filings of the updates of those meetings, along with the results of the OSS testing, is what the Commission needs.<sup>17</sup>

Ms. Friesen: Is what the Commission needs? For what?<sup>18</sup>

Mr. Crain: To make a recommendation to the FCC regarding whether we should be allowed to provide long distance ...<sup>19</sup>

These statements appear to explain Qwest's intent with respect to the purpose of its Status Reports. The implication of Mr. Crain's statement is clear; Qwest anticipates that the CMP redesign and apparently that alone will be examined by the Commission through these status filings and the Commission will make a determination of § 271 compliance based thereon.

As an initial matter, the Status Report of October has failed to adequately address all the "significant issues" from the workshop and they are not yet resolved. Just by looking at the sixteen issues identified<sup>20</sup> in the Status Report, it is clear that discussions regarding twelve of them are either ongoing or have not even begun. Therefore, if one purpose of the Status Report for October was, as stated by Mr. Crain two months ago, to "address" the workshop issues, it has failed in that objective.

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<sup>16</sup> *Id.* at p. 290.

<sup>17</sup> *Id.* at p. 307.

<sup>18</sup> *Id.*

<sup>19</sup> *Id.*

<sup>20</sup> While the issues are numbered through eighteen, there are actually only sixteen discrete issues described.

More importantly, however, the second stated purpose suggests that Qwest expects a very limited Commission review of a redesigned CMP (not necessarily an implemented CMP) based entirely upon nothing more than a pile of paper that describes the alleged “status” of CMP. While Qwest has slowly revealed its ever-changing procedural desires regarding Commission review of CMP and the § 271 process, AT&T among others has repeatedly—and to no avail—pleaded for some clearly identified regulatory procedure and oversight of the CMP process.<sup>21</sup> At one point, when CLECs such as AT&T were agreeing to accommodate Qwest’s desire to take workshop issues to CMP and cooperate in its redesign, Qwest expressly stated that it would bring back to the Commissions for workshop or other Commission-defined review its completed CMP redesign and the issues associated therewith.<sup>22</sup> At that time, Mr. Crain from Qwest said:

Mr. Crain: [M]y proposal is, *when we’re done* negotiating these changes, I think we’re going to be able to resolve the issues with the CLEC body. We will submit those new documents to the seven states, and parties who want to comment can comment at that time. At that time *if parties feel like they need to have a workshop to discuss open issues, we’d be open to doing that*. But since we believe we’ll be able to work on the details, we don’t think it’s advisable at this point to schedule another workshop on change management.<sup>23</sup>

Now, and yet again, Qwest’s procedural position has apparently changed. Its Status Report suggests that it will continue to file these Status Reports on the redesign process “while [the § 271 docket] remains open.”<sup>24</sup> At the current rate of progress, redesign alone, without considering implementation, will not conclude until sometime next year. Thus, there exists considerable disparity between the realistic completion date of

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<sup>21</sup> Exhibit B to the Status Report, Draft Meeting Minutes, September 5 and 6, pp. 5 – 8.

<sup>22</sup> 8/23/01 Colorado Tr. at pp. 255-257.

<sup>23</sup> 6/28/01 Multi-State Tr. at p. 6 (emphasis added).

<sup>24</sup> Status Report at p. 1.

the CMP redesign, Mr. Crain's statements and Qwest's public statements regarding its desire to race to the FCC.

In any event, AT&T requests that the Commission define clearly the procedure that it will follow to review Qwest's CMP redesign, its implementation and the issues that were "punted" from the workshops to the CMP for resolution. At a minimum, due process requires that the Commission hear the impasse issue and base its § 271 determination on a sufficient evidentiary record. Moreover, the FCC anticipates a complete state investigation of a fully implemented CMP.

To that end, AT&T's desire to be "heard" by the Commission may not require a full blown workshop or hearing, but rather that the Commission accept initial briefs and responsive briefs with evidentiary support attached that would address all the impasse issues at the conclusion of the CMP redesign and implementation. Status Reports do not provide either a sufficient record or any grounds upon which this or any other Commission, including the FCC can determine whether Qwest's CMP actually complies with the law.

For now, the purpose of this and other Status Reports should be to inform the Commission that discussions are underway, and they should outline the progress along with the developing or evolving impasse issues.

## **II. DISCUSSION OF SPECIFIC ISSUES**

Leaving the background and broad procedural concerns, AT&T will discuss five specific issues here that relate to Qwest's Report, its exhibits and AT&T's concerns. The five issues are: (a) the "interim" nature of the solutions and their impact on the CMP redesign process; (b) the dispute resolution process; (c) updating Qwest's technical and

other publications to be compliant with the SGAT and the difficulty associated with identification of such updates; (d) other miscellaneous issues; and (e) missing CLEC correspondence identifying issues for resolution.

**A. Interim Solutions and Their Impact.**

As noted in Qwest's Status Report, the solutions or agreements reached to date are "interim" in nature. AT&T cannot stress strongly enough that any agreements reached in CMP redesign thus far are, as Qwest cautions, interim. What this means is that while the parties have agreed to address a jumble of CMP redesign OSS and product or process issue and they have come to tentative agreement, it does not mean that Qwest has actually implemented any changes to its CMP nor that any proposed or implemented changes are working as desired or are constitute the ultimate resolution. Moreover, an important part of the re-design process will be to pull this all together to insure that the entire process is clearly organized and that it is documented thoroughly and consistently. Qwest has agreed to this approach. The only conclusion one may draw from Qwest's Status Report is that CMP redesign is proceeding and that much work still needs to be done.

**B. Dispute Resolution.**

On page 2 of the Status Report, Qwest identifies a process to bring impasse issues that arise in CMP redesign to the Commission for resolution. While this is something the parties agreed would be useful, this process was developed largely without input from the Commission and it remains not yet clearly or entirely developed.

At present, there are two issues of particular concern. First, and as previously noted above, there is no record being developed in the CMP redesign. There are minutes,

but they do not reflect all of the substantive and important statements made in these meetings and since they are minutes drafted by Qwest, they may not always accurately reflect the statements they purport to capture.<sup>25</sup>

Second, and in addition to the lacking evidentiary record, it is not clear what process Qwest envisions the Commission following to resolve disputes once the impasse issues have been identified in the Status Reports. It is AT&T's expectation that the parties will work to resolve issues during the CMP redesign meetings and bring only important substantive issues to the Commission's attention for eventual resolution. Even so, neither the Status Reports nor the comments related thereto are a substitute for a record and briefs on these issues. Accordingly, due process requires that the parties have the opportunity to present factual evidence in support of their positions coupled with reasonable opportunity to be heard by the Commission before the Commission renders any decision on impasse issues.

**C. Updating Qwest's Technical and other Publications to be Consistent with the SGAT and the Problems Associated with Identification and Tracking Such Updates.**

During the § 271 workshops, CLECs informed the Commissions that Qwest's technical publications ("Tech Pub"), Qwest's Product Catalog ("PCAT") and other product documents were inconsistent with what Qwest's SGAT stated and what Qwest represented it was doing during the workshops. Because these documents are the actual documents that Qwest's field personnel and the CLEC personnel employ, they are an

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<sup>25</sup> The parties agreed that Qwest would circulate draft minutes within three days after a CMP redesign meeting and that CLECs would have the opportunity to comment on the draft minutes.. Unfortunately, however, some of the draft minutes have not been distributed by Qwest for over two weeks after the CMP re-design meeting. Because of the long time delay, CLECs' ability to provide meaningful comments to these minutes is being impacted.

important representation of what Qwest is actually doing with respect to its § 271 obligations. Qwest claimed during the workshops that it was updating these documents, and therefore, the Commissions did not need at that time to review them. In fact with respect to the update of these documents, Qwest entered into a Stipulation to ensure that the necessary updates were made.

The Stipulation was reached first in Colorado. The Stipulation was subsequently agreed to in every other state workshop. It provided:

Qwest agrees that, within 45 days of closing a workshop, it will update its technical publications, product catalog (also known as the IRRG), and product documentation for CLECs to reflect the agreements made in the workshop and to make Qwest's documentation consistent with its SGAT. Qwest will then submit the updated technical publications, product catalog, and product documentation to the Change Management Process (CICMP). When Qwest submits the documents to CICMP, Qwest will file a notice in this proceeding indicating that the documents have been updated and how to obtain copies. Qwest will take affirmative action following the close of a workshop to communicate to appropriate personnel and to implement the agreements made in such workshop. Qwest acknowledges that any commission order or report recommending that Qwest meet a checklist item will be conditioned on Qwest's compliance with this commitment.<sup>26</sup>

In addition, Qwest agreed to provide such notification with a "decoder ring" that explains the reasons for the changes that were made.<sup>27</sup> To date, AT&T has received no such notification with regard to Tech. Pubs. In addition, it appears that Qwest has not provided all appropriate notification regarding PCAT changes.

By and large, Qwest has not met the 45-day submission obligation and it has been tremendously difficult for CLECs to identify and track the changes Qwest is making

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<sup>26</sup> Colorado Workshop Exhibit 4 Qwest 97 (as modified by further discussions, 5/22/01 CO Tr. at pp. 82 – 83; Arizona Workshop Exhibit 4-Qwest-12.

<sup>27</sup> 4/24/01 WA Tr. at pp. 3516 – 3520 (reference to "decoder ring" at p. 3518, ln. 3). See also 7/11/01 WA Tr. at pp. 4188 – 419. In a recent e-mail distribution, Qwest has asserted that AT&T waived the request for a "decoder ring" based on the discussion in the July 11, 2001 transcript from Washington, however, AT&T disagrees with that assertion.

because, among other things, Qwest was not adequately marking its submissions. For example, to date, Qwest has only provided CLECs with notice of an update to one of the eleven Tech Pubs that need revision - Tech Pub, 77386, "Interconnection and Collocation for Transport and Switched Unbundled Network Elements and Finished Services" Issue G, Final Draft dated September 2001. This was served on the parties electronically on September 25, 2001. The introduction to this Tech Pub states that the only changes were to add the ability for CLECs to collocate Remote Switching Units ("RSUs").<sup>28</sup> AT&T's initial review of Tech Pub 77386 Issue F (a version prior to Issue G) in August, 2001 indicated that many additional changes would be required to bring the Tech Pub into compliance with the SGAT for any of the states that had 271/SGAT proceedings.

At some time in the past several weeks Qwest has posted updated versions of Tech Pubs to its website without notifying CLECs at all (not through this process and not through CMP). Tech Pubs 77384 (UNE Loop), 77391 (UNE Switch) and 77405 (Sub-Loop) were updated in September 2001. To the best of AT&T's knowledge, Qwest has failed to notify CLECs of the new versions of these three Tech Pubs (certainly there has been no notice to the § 271 workshop service list as required by the Stipulation) and Qwest has not indicated what has been changed in these Tech Pubs.

As far as AT&T has been able to determine, the remaining seven Tech Pubs have not been updated since June 2001. Many of these Tech Pubs contain language that is contrary to Qwest's current position and its current SGAT filings in the § 271 workshops. Many of these Tech Pubs are also deficient, missing important new capabilities that were added to the SGAT by mutual agreement or by Commission Order.

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<sup>28</sup> Qwest had made extensive revisions to this Tech. Pub. in June 2001, without providing any notice to CLECs of these changes being posted on the Web and of what the specific changes were.

From an examination of Qwest's website, Qwest currently maintains approximately 83 Technical Publications that represent the various aspects of its business. Of the 83 Tech Pubs, at least eleven of them directly relate to the provisioning of service for CLECs. Although these eleven refer to many of the other 83 Tech Pubs, they represent the majority of issues that concern CLECs and have an impact on Qwest's § 271 compliance.

Based on a review of Qwest's website, as of October 18, 2001, the table below gives the current "Issue" of the eleven Tech. Pubs. that primarily concern CLECs. On the table, the rightmost columns identify the Tech. Pub. number, its title and the current version. The columns to the left show, if any, the "new" or latest update. AT&T believes that the content of the Tech Pubs issued in June is generally current for workshops conducted until about April 2001; however, this cannot be verified without Qwest producing redline versions and explanations of the changes. Changes that were made to the SGAT or by Commission orders after April appear not to be captured in the June versions. AT&T has not yet attempted to review September versions for compliance with SGAT changes and Commission orders.

Tech Pub	Title	Current Issue		New Issue	
77350	Installation Guidelines	June	K		
77383	Dark Fiber	June	F		
77384	UNE Loop	June	I	J	Sept ***
77386	Collocation and Interconnection	June	F	G	Sept *
77389	UNE Transport	June	E		
77391	UNE Switching	June	C	D	Sept ***
77398	LIS Interconnection	June	D		
77403	EEL	June	B		
77405	Sub-Loop	June	B	C	Sept ***
77406	Shared Loop	June	B		
77408	Packet Switching	June	B		

\* Notice to CLECs

\*\*\* No notice to CLECs

The Qwest technical publications are voluminous. Without proper notice of submission and change tracking from Qwest, that includes information about the specific changes that were made and the reasons for the changes, CLECs are left to review the entire document all over again and fish through transcripts and other workshop material to ferret out whether Qwest made all the changes it agreed to and whether the changes accurately reflect those agreements.

AT&T has similar concerns with the revised PCAT sections Qwest has distributed over the last several months. While Qwest appears to have made an effort to summarize some of the PCAT changes in a brief table, it is still difficult to identify all of the changes in the PCATs because they are not marked in any way. In addition, the PCAT has no

date or version numbers so that makes review difficult as well. Finally, it is not clear which changes were made because of workshops and which changes were made for other reasons.

Exhibit E to the Status Report is entitled “Interim Qwest Product/Process Change Management Process.”

By this document, among other things, Qwest agrees to mark changes to its product documents (*e.g.*, PCAT, technical publications and other product documents) each time they are revised and include a historical log that identifies all the changes and why they were made. *As described, Exhibit E should prove to be a useful tool for CLECs to actually identify the changes that Qwest is making and why; however, Qwest has not yet implemented it so a review of how Qwest actually does this is impossible. In addition, there is more to the issue of identifying changes to Qwest documents than can be gleaned from the Report and its Exhibit E.*

In the CMP redesign forum, Qwest has only wanted to do the marking and identification of changes on a going forward basis. However, AT&T and other CLECs pointed out that Qwest has been sending out modified product documents and many Tech Pubs for several months and they have been very difficult to review because changes were not marked and Qwest provided no useful explanation of the changes. In CMP redesign, AT&T and other CLECs have repeatedly told Qwest that they want Qwest to go back and mark the changes to these documents and identify the reason for the changes. At the CMP redesign meeting held on October 16, 2001, Qwest responded that with PCAT changes it would only go back to the first PCAT version to mark changes, it would not start this work until January 2002 and it would take three

months to complete. It is unclear when the first "PCAT" version came into being as it replaced the IRRG at some point (in addition the PCAT is not dated or marked with version numbers). With regard to Tech Pubs, Qwest is still researching the question.

These responses are thus far unacceptable because Qwest agreed in the § 271 workshops to identify the changes to the documents and the reasons for those changes. AT&T is puzzled by Qwest's lack of clarity around its alteration of the Tech Pubs, PCAT and other product documents. Qwest assured CLECs that the agreements reached in the § 271 workshops would be reflected in all of these product and operational documents. Since demonstrating compliance is Qwest's burden in this process, AT&T fails to understand why Qwest is not actively identifying the issues that it has accommodated in these documents. The more Qwest objects to substantiating this work, the less comfort any party should that Qwest is actually doing this work and that Qwest intends to implement the provisions of the SGAT.

**D. Other Issues.**

**1. Interconnection Issue.**

In preparing this Response, AT&T found that one of the issues identified in the interconnection workshop, and then again in the general terms and conditions workshop, did not make it to the list of issues identified in Qwest's Status Report. The issue should have issue number CM-19 and should address the inclusion of intervals for LIS trunks in the CMP.<sup>29</sup> This issue arose from language in § 7.4.7 of the SGAT that states, in part, "Qwest will provide notice to CLEC of any changes to the LIS trunk intervals consistent with the change management process applicable to the PCAT." The parties in the

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<sup>29</sup> 8/22/01 Colorado Tr. pp. 323-329.

Colorado General Terms and Conditions workshop identified this as an issue and expected that the CMP would deal with LIS trunk intervals and a process in CMP for changing them. At this point, LIS trunk intervals have not been discussed in the CMP redesign.

## **2. SGAT Language Describing CMP.**

In the Report, Qwest identifies issues numbered 14 and 15 as dealing with the inclusion of a detailed exhibit to the SGAT that explains CMP. In response to these issues, the Status Report states that Qwest's proposal for § 12.2.6 is attached to the Report, but that it has not yet been agreed to between Qwest and the CLECs. Section 12.2.6 is the provision in the SGAT that explains the CMP. Qwest has proposed § 12.2.6 to be a very high level description of CMP with an attached exhibit, the "CLEC-Qwest Change Management Process." As § 12.2.6 has been drafted by Qwest, that SGAT exhibit will constantly be subject to change even as part of the interconnection agreement between Qwest and a CLEC. Since § 12.2.6 itself is still open and not yet the subject of agreement, it should be tracked as a separate issue. AT&T and other CLECs have stated that a meaningful attempt at drafting § 12.2.6 cannot be undertaken until greater progress has been made in the CMP redesign.<sup>30</sup> AT&T expects that there will be certain elements of CMP that the CLECs will want to include as contract obligations in the language of § 12.2.6 itself, not subject to change in the CMP process but only through an amendment to the interconnection agreement between Qwest and the CLEC.

## **3. Workshop Issues Deferred to CMP.**

In addition to the issues already identified in the Status Report and in this

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<sup>30</sup> See Qwest Report, Exhibit B, Draft Meeting Minutes, September 18 and 20, 2001, p.4.

Response, there are a number of other issues that were discussed in the SGAT workshops but were deferred to CMP. Some were deferred as substantive issues to be resolved by the CMP Forum and others were deferred as items that would be addressed in the CMP redesign and captured within the scope of the redesigned CMP. AT&T has reviewed the SGAT workshop transcripts and prepared a list of such issues, attached hereto as **Exhibit D**. Going through the all of the workshop transcripts is an arduous task so it is possible that AT&T has not identified all such issues. Exhibit D should only be considered a starting point for identification of all such issues. AT&T believes that as part of this reporting process Qwest has chosen to undertake regarding CMP redesign, Qwest should also identify and report on the status of all matters from the SGAT workshops that were deferred to the CMP Forum or CMP redesign.

Finally, there are other issues that may arise in the course of the CMP Redesign that will be brought to the Commission's attention. Such issues will likely come to the Commission's attention through the CMP redesign dispute resolution process; however, they may be identified by other means as well.

**E. CLEC Correspondence Identifying Issues for Resolution.**

As the CMP redesign has been underway, there have been points in time where AT&T and other CLECs have communicated in writing certain concerns to Qwest regarding CMP redesign or the CMP forum. Attached as **Exhibit E** to this Comment are memoranda that AT&T has sent to Qwest on various issues including: (i) Qwest not following the CMP processes in order to specifically accomplish Qwest goals, while this opportunity is not available to CLECs (September 14<sup>th</sup> memo); (ii) the proper documentation of CMP (September 14<sup>th</sup> memo); (iii) characterization of CMP redesign

(September 14<sup>th</sup> memo); (iv) whether CMP Should be used for changes to PIDs and other performance issues (October 10<sup>th</sup> memo); (v) Qwest's conduct in the redesign meetings (September 14<sup>th</sup> memo); (vi) change to Qwest product documents (October 10<sup>th</sup> memo), among others. While some of these concerns have been addressed, at least in part, others have not and still require resolution. Also attached as part of Exhibit D to this Response is a message from Eschelon to Qwest similarly identifying concerns that carrier has. AT&T expects to continue to use this method to flag issues of concern.

### **CONCLUSION**

Based on the Report and AT&T's Response, the Commission may conclude only that CMP redesign is proceeding with participation of the CLECs, but that many issues have not yet been addressed and more time is needed to complete the redesign process. An important acknowledgment among the participants in CMP redesign is that all documentation prepared in the redesign is subject to continuous review and revision through this process and cannot be considered final until the redesign process is completed. Accordingly, there is no determination required by the Commission at this time as to the progress of CMP redesign or the documentation prepared in that process.

The CMP redesign process will shape the interaction between Qwest and CLECs going forward, in particular after Qwest obtains § 271 approval. As such, AT&T believes that the Commission must undertake a thorough review of the redesigned CMP, among other things, before it should recommend approval of Qwest's § 271 application.

Respectfully submitted this 29<sup>th</sup> day of October 2001.

**AT&T COMMUNICATIONS OF THE  
MOUNTAIN STATES, INC. AND TCG  
PHOENIX**

By: Letty S.D. Friesen by DRF

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**Test Vendor ID:** IWO 1075-1  
**Qwest Internal Tracking ID:** TI 220  
**Observation/IWO Title:** Current CICMP Process  
**Test Type/Domain:** Rel. Management / Robin Ferris  
**Date Qwest Received:** 2/19/2001  
**Initial Response Date:** 2/26/2001  
**Supplemental Response Date:** 4/17/2001

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**Test Incident Summary:**

The current CICMP process is not a true collaborative effort for making changes to the CLEC-specific pre-order, order, and repair interfaces.

The process, as it exists today, only addresses roughly a third of the changes that are made to these interfaces. Since these are interfaces that were created and exist solely for the purpose of exchanging information with Co-Providers, all changes to them should be discussed and voted on by the systems' primary users – the CLECs – in a collaborative effort with Qwest.

Specifics are provided below.

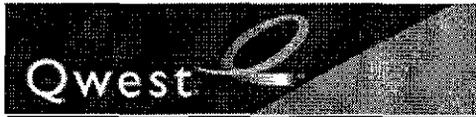
The primary functions of the CICMP, as stated in its charter, are:

To track and communicate CLEC-requested changes to the various Qwest interfaces.  
To notify CLECs of CLEC-impacting changes.

Historically, however, CLEC requests have only accounted for a small percentage of the functionality added to any given release. For instance, IMA-GUI release 6.0 contains 24 changes or enhancements over release 5.2; and only 4 of them originated with a CLEC request.

Further, the Qwest-originated requests, which account for the majority of enhancements to these systems, are totally outside the scope of the CICMP process. They are not open for debate, prioritization, voting, etc., by the CLEC community. Not only are they not open for debate, the CICMP manager is not even involved in the process by which these internal requests are approved (as of November 2000).

In any software requirements management system, it is understood that the end-users are not the sole originators of CRs. It is a given, in fact, that Qwest will have the need to make architectural, code, or database modifications to its systems from time to time due to various internal requirements. It is also understandable that regulatory requirements will mandate changes to various CLEC systems. The fact remains that many of the enhancements that are generated internally by Qwest are related neither to architecture or regulatory concerns. Regardless of the source of the enhancement, however, the process by which these requests are made, voted on, prioritized, and implemented is not made available to the CLEC community in any way, nor do the CLECs have any input into it whatsoever. As a result, there is justifiable concern that the internal CRs are not subject to the same scrutiny and time-delay inherent in the CICMP process.



Best practices in software engineering dictate that software change management processes treat all CRs in a cohesive, uniform manner. Further, all stakeholders in the systems in question, including the end-users, must have representation at the change control meetings during which all changes are voted on. The fact that Qwest has two separate change management processes, one internal and one external, for the same systems is a deficiency.

The implementation of IMA Release 6.0 was an illustrative case. The following is a list of all enhancements implemented during the 6.0 release. Enhancements that originated as a CICMP CR are identified as such. The remaining CRs were internally developed by Qwest.

Flowthrough improvements (Blocking FID)  
SAG only information and Address Validation  
Access to loop information (CICMP CR 4261631)  
UNE-P (POTS)  
UNE-C PL (DS1, DS3)  
UNE-P (Centrex) (Conversion only)  
UNE-P (ISDN)  
Resale Centrex – Centrex 21  
Retrieve large CSRs  
Pre-Order transaction: parsed CSR info (CICMP CR 4342063)  
Additional lines on UBL conversion (CICMP CR 4185852)  
Electronic Work Completion and Jeopardy Notification, and Manual Jeopardy Notification  
Electronic FOC via IMA GUI  
Electronic Reject Notification via IMA GUI  
Electronic Billing Completion Notification via EDI/GUI  
Electronic LSR Completion Notification via Interface  
Auto-push statuses to Co-Providers  
Access to multi-point Private Line Resale  
Access to Designed Services PBX trunks  
Access to ISDN PRI  
Access to Sub-Loop  
Resale Centrex – flowthrough for Western region  
CSRs for Centrex in electronic format (CICMP CR 5235881)  
Create notification process for LSMS system outages (CICMP CR 5043023)  
Retrieval of CSR by BTN or WTN (CICMP CR 4441096)  
Extend IMA hours of operation (CICMP CR 4267810). Completed prior to 6.0 but recognized as being implemented in 6.0.

Note that two of the CRs, 5043023 and 4267810, were process and not system related. Also, “Extending IMA hours of operation” was an enhancement that Qwest already planned and just happened to coincide with a CR.

### ***Qwest Response Summary:***

At this time Qwest has requested the Description of Incident to be clarified so that we can better understand what the specific incident(s) is we need to address in our response. The due date for the official Qwest Response will be determined based on the date we receive the clarification.

### ***Qwest Supplemental Response 4/17/2001:***

Qwest disagrees with CGEY’s belief as to the degree to which the CICMP process is not collaborative. It is Qwest’s position that it is appropriate for CLECs to vote on CLEC initiated changes but is not appropriate for CLECs to vote on all changes.



The CICMP process provides for the CLECs to vote on the CLEC recommended changes that will be scheduled in the releases. Qwest also acknowledges that while CLEC requests are always part of a given release, the number of CLEC initiated changes can vary based on the following factors:

- Scope/size of the release based on the time frame and the size of changes
  - System changes associated with changes to national guidelines, e.g., OBF
  - System changes/additions required for state/federal regulatory compliance
  - System changes to increase system efficiency and/or correct problems identified by Qwest or the CLECs *outside of the CICMP process*
  - System changes to improve capacity, mechanization capabilities, etc.
- Many of these changes benefit both Qwest and the CLEC community by improving system capacity, capabilities, processing time frames, and Qwest's ability to provide CLECs with "a meaningful opportunity to compete".

An example of a recent release schedule is the 6.0 release documentation that was comprised of 37 total changes. The following is a breakdown of the changes in this release:

- |  |    |
|--|----|
| ▪ Technical – Maintenance Management of System | 4  |
| ▪ Center – Support CLECs                       | 5  |
| ▪ CICMP  | 6  |
| ▪ Regulatory                                   | 14 |
| ▪ New Products                                 | 8  |

Please note: The numbers for the 6.0 release as documented in this reply are taken directly from the 6.0 Implementation Documentation.

While the Qwest specific changes are not open for "prioritization or voting" by the CLEC community, Qwest does receive input from CLECs on changes that impact the CLECs. CLEC input is provided during CLEC initiated conference calls and the monthly CICMP meetings. CLEC input can be logged as "action items" on the Action Items log. The Action Items log is distributed to all CICMP members and posted publicly on the Qwest CICMP web site. <http://www.qwest.com/wholesale/cicmp/teammeetings.html>

As a final note, Qwest does not agree that the systems covered by the CICMP process were "designed and exist solely for the use of Qwest wholesale customers" and these "wholesale customers are the only users of these systems". The suite of OSS systems were designed for the use and benefit of CLECs, however, these systems are also used by Qwest personnel *for the benefit of the CLECs* in processing CLEC requests for wholesale products and services.

Additionally, the CLEC system interfaces have many "back-office" systems and functions. Although these back-office systems/functions may not be "visible" to the CLECs, they are required for the benefit of processing CLEC requests and transactions. When these systems require changes that affect CLEC interfaces, these changes are communicated to the CLECs through the CICMP process.

As in any software requirements management system, Qwest will have the need to make architectural, code, or database modifications to its back-office systems from time to time due to internal requirements.

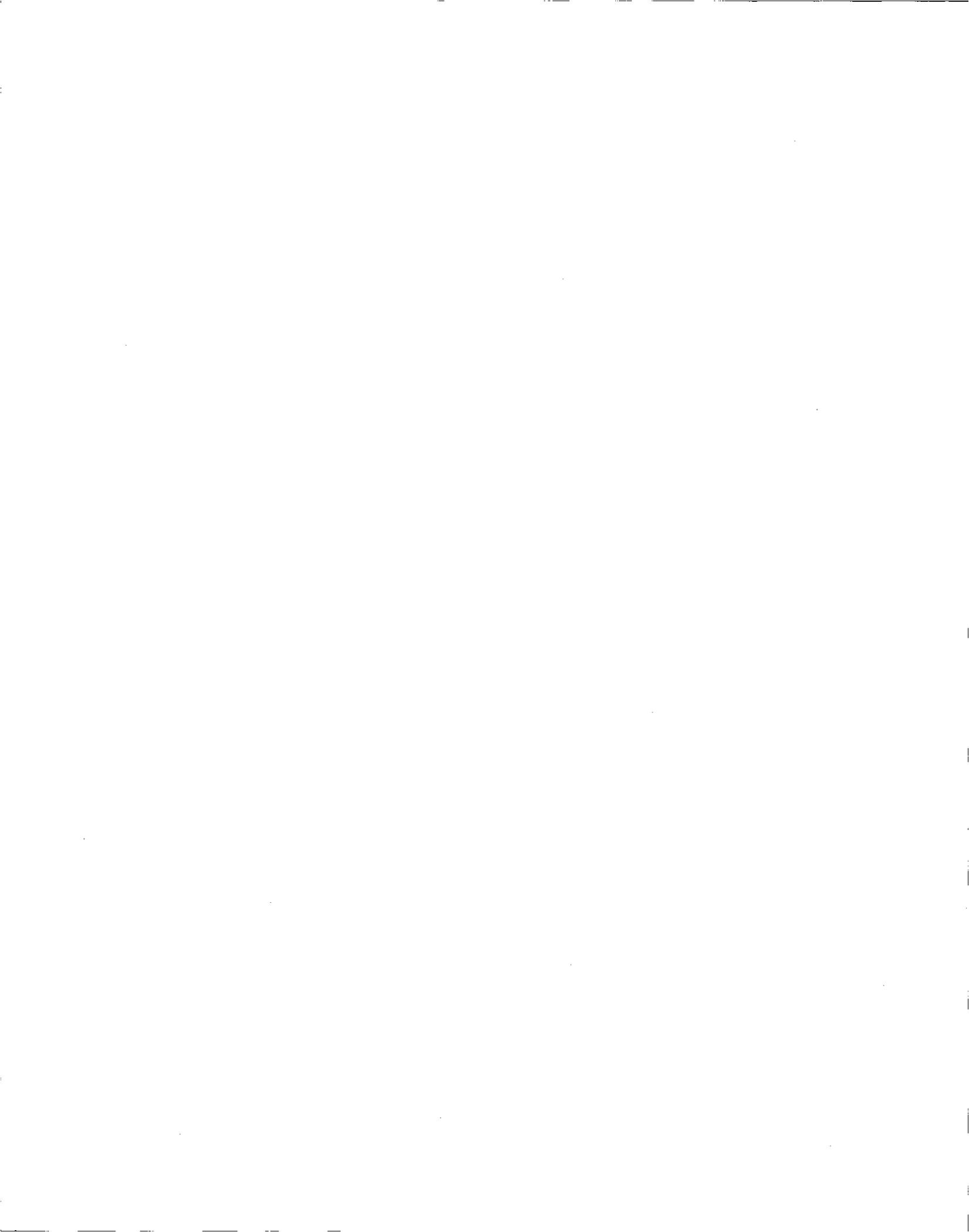
***CGE&Y Supplemental Response 8/29/2001:***

In July 2001, Qwest began a comprehensive re-design of its CICMP process. The proposed re-design brings Qwest's process more in line with that of other RBOCs, specifically Verizon and Bell South, and with the proposed process outlined in OBF LSOP issue 2233.



Since these re-design efforts are still being discussed and collaboratively reviewed between Qwest and the CLECs, CGE&Y feels that it would be premature to close this IWO at this time.

*Attachment(s):* None





**Test Vendor ID:** IWO 1076-1  
**Qwest Internal Tracking ID:** TI 222  
**Observation/IWO Title:** Change Request (CR) Process Used in the CICMP  
**Test Type/Domain:** Rel. Management / Robin Ferris  
**Date Qwest Received:** 2/20/2001  
**Initial Response Date:** 2/26/2001  
**Supplemental Response Date:** 4/17/2001

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**Test Incident Summary:**

The Change Request (CR) process used in the CICMP needs to be reviewed and re-designed in order for CRs to progress through the lifecycle in a much more timely fashion.

Despite the application of fairly conservative time intervals to individual steps of the CR process, the length of time it takes an average CR to make it through the process, not even taking into account making it into a release, is simply too long. If the length of time it takes a CR to actually make it into a release is taken into account, the length of time can double or even triple.

The primary culprits here are the once-monthly CICMP meetings and their relation to internal development meetings, and the frequency of software releases (releases are scheduled approximately every four months).

The frequency of the CICMP meetings has the potential to slow down the CR process at several points. For instance, depending upon when a CLEC submits a CR, it can take anywhere from several days to an entire month for the CR to be initially "industry evaluated." If the CR requires clarification, it can take anywhere from several days to two months before it is discussed at its first CICMP meeting.

Having been initially discussed at the CICMP meeting, the CR still has a minimum of two more CICMP meetings at which it must be discussed: once when it receives a "T-Shirt Size," and again after it has been prioritized and is baselined for release. If further clarification is required once the CR has been discussed at any of the aforementioned stages, the CR will need to come back to the CICMP once again. Each time the CR must come back to a CICMP meeting for discussion, there is the possibility that it will have to wait nearly a month for one to come along.

The attached table shows the lifecycle of CICMP CRs that were released in IMA/EDI version 6.0. Not counting CRs 4267810 and 5043023, which are process-related and not system-related, the average time it took the CRs to make it into a software release from their initiation was 12.5 months.

**Qwest Response Summary:**

At this time Qwest has requested the Description of Incident to be clarified so that we can better understand what the specific incident(s) is we need to address in our response. The due date for the official Qwest Response will be determined based on the date we receive the clarification.

**Qwest Supplemental Response 4/17/2001:**



Qwest has initiated improvements to the CICMP process beginning in November 2000, and continues to implement improvements. These improvements have made it possible to reduce the time required for CRs to be "industry evaluated" to three business days. If a CR requires clarification, the current process requires the clarification to be provided immediately. Additionally, the "t-shirt size" is conducted immediately upon receipt of a CR rather than holding it for a scheduled review meeting. Once the CR is t-shirt sized, the CR is eligible for "industry prioritization". The time frame for a CR to be selected for a release can range from three days to six months and is determined by the:

- Date CR is received
- Priority it is given by the CLECs
- Industry/Business needs
- Available capacity in a release

The Qwest once a month CICMP meetings are in line with other ILECs such as SBC and Bell Atlantic (Verizon) which have both been approved by the FCC.

To meet emergency needs of the CLECs, Industry requirements, and Qwest system updates, the Qwest CICMP process demonstrates flexibility by allowing for changes to the scheduled releases prior to the Release Scope Commitment date.

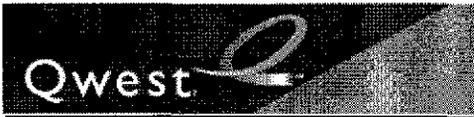
***CGE&Y Supplemental Response 8/29/2001:***

In July 2001, Qwest began a comprehensive re-design of its CICMP process. The proposed re-design brings Qwest's process more in line with that of other RBOCs, specifically Verizon and Bell South, and with the proposed process outlined in OBF LSOP issue 2233.

Since these re-design efforts are still being discussed and collaboratively reviewed between Qwest and the CLECs, CGE&Y feels that it would be premature to close this IWO at this time.

***Attachment(s):*** None





**Test Vendor ID:** IWO 1078  
**Qwest Internal Tracking ID:** TI 232  
**Observation/IWO Title:** Final EDI Design Documents  
**Test Type/Domain:** Relationship Management / Robin Ferris  
**Date Qwest Received:** 2/26/2001  
**Formal Response Date:** 3/5/2001

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**Test Incident Summary:**

“Final” EDI design documents are only released to the CLECs three weeks prior to a new EDI release. This issue has been repeatedly brought up at CICMP meetings by both the CLECs and third party EDI software vendors. Qwest has had the following answers to this issue:

1. “Draft developer worksheets,” which are developed by the EDI developers during their design process, are issued to the CLEC community approximately 60 days before a release. They are updated as needed until the release is final.
2. EDI releases are supported by Qwest for six months after the release of a newer version.

The problem with item #1 above is that the “draft developer worksheets” are exactly that: drafts. Due to their sheer size, however, the fact that they may change over time is a significant hindrance to using them as a design document. It has also been observed, particularly with IMA release 6.0, that the design documents and business rules continue to be refined even after the system is placed in production.

When the above point has been made to Qwest in the past, however, the response has always been item #2: that a CLEC can always use the previous release for six months after a new release, thus giving them time to use the “final” design documents to modify their system. While this is certainly true, it doesn't really address the problem, as remaining with a previous software release prevents CLECs from taking advantage of any expanded functionality offered by a new release.

The existence of stable, unchanging requirements is an absolute pre-requisite to CLECs being able to code their own systems to match Qwest's. The lack of a true “requirements freeze” a sufficient time prior to production release, coupled with the lack of a true EDI testing environment, make it difficult for CLECs to successfully code their systems and do true user acceptance testing. IWO #AZIWO1068 has already been issued in regard to the EDI testing environment.

**Qwest Response Summary:**

Qwest's EDI release documentation notification procedures give the CLECs adequate time to prepare for an EDI release.

Qwest distributes initial EDI release requirements, Draft Developer Worksheets (DDW), 196 to 166<sup>1</sup> days prior to the recommended<sup>2</sup> CLEC implementation date. SBC distributes initial requirements for application to application interfaces between 152 and 172 days before implementation.<sup>3</sup>

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<sup>1</sup> All times given in days are approximate and assume 30.4 days per month.



Draft Developer Worksheets contain all the technical specifications and business rules necessary to create an EDI interface to Qwest's systems, except EDI maps and the Data Dictionary, which are included in the Disclosure Document. DDWs change very little between the time they're distributed and the time of the release; however, should changes arise, they are announced to the CLECs in the Disclosure Document.

The Disclosure Document is released 49 days prior to the recommended CLEC implementation date. The Disclosure Document contains the following elements:

- Developer Worksheets
- EDI Mappings
- Data Dictionary
- Business Descriptions
- Business Models
- Change Summary

Qwest opens a release to testing 42 days prior to the recommended CLEC implementation date; in other words, four weeks before the release is implemented CLECs can begin testing on a release. Although system changes may be necessary during the testing period, CLECs could have the majority of their systems tested before the release is implemented.

Any changes between the Disclosure Document release and the Release Implementation are given to the CLECs in the Addendum to the release, which is distributed 14 days after Qwest's implementation of a release. Qwest considers the Addendum as the "final" design document. Qwest agrees that a stable and unchanging environment is necessary for CLECs to be able to interface with Qwest; when the Addendum is issued, our system is "stable and unchanging." Qwest recommends CLECs migrate to the release after the Addendum is issued.

Qwest's EDI release documentation notification timelines meet or exceed industry expectations, demonstrated by comparing SBC timelines to Qwest timelines.

***CGE&Y Supplemental Response, 8/29/01:***

In July 2001, Qwest began a comprehensive re-design of its CICMP process. The proposed re-design brings Qwest's process more in line with that of other RBOCs, specifically Verizon and Bell South, and with the proposed process outlined in OBF LSOP issue 2233. This re-designed process also addresses the timeliness of design documentation distribution.

Since these re-design efforts are still being discussed and collaboratively reviewed between Qwest and the CLECs, CGE&Y feels that it would be premature to close this IWO at this time.

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<sup>2</sup> The recommended CLEC implementation date is the day the Addendum is distributed, 14 days after the release date.

<sup>3</sup> Texas decision at fn. 338.

**Performance Acceptance Certificate**

<b>Incident Work Order Number</b>	<b>AZIWO1127</b>
<b>Date/Time of Incident</b>	<b>6/6/01</b>
<b>Severity Level</b>	
<b>Initiator</b>	<b>John Hunt / Relationship Management</b>
<b>Date of Qwest Resolution</b>	<b>6/22/2001</b>
<b>TAG Concurrence Date</b>	

**Description of Incident**

There was no clearly identified process for communicating software changes that were outside of a scheduled IMA software release. These updates were implemented without a specification identifying the specific modifications. The Qwest EDI implementation process did not include a clearly defined protocol or schedule for closing open Change Requests and communicating the closure to the CLEC on the CR associated with a scenario after the completion of the IMA EDI Release 6.0 migration. There are no standard Co-Provider notification lists that specified the Co-Provider who would be notified of the specific CR fix. (I.E. CR-18813)

Reference CR's for HPC opened during the 5.0 certification process. To further support this, an IWO was issued for each CR. If further information is required, contact John Hunt or Jerry Schumm.

**Resolution**

Qwest has researched the issue outlined in IWO 1127 and will update its IMA and FBDL EDI Implementation Guide documentation. Additionally, Qwest has taken internal steps to ensure the process is consistently followed.

The standard process is as follows:

When a change is made to the EDI system which impacts the EDI Disclosure Document, an addendum to Disclosure is issued documenting the change in the system through the CICMP process. This informs all Co-Providers of the change to the system. Additionally when these changes were originated by a Co-Provider, the Co-Provider is informed of the CR closure.

Qwest will include a detailed version of the process description to communicate the resolution to Co-Provider CRs in the next revision of the IMA and FBDL EDI Implementation Guide. This revision is targeted to be published on July 25, 2001.

Additionally, the Qwest team has discussed this process in its standing weekly internal meetings to ensure the entire team is aware of the correct process and committed to consistently following it.

<b>Resolution Submitted by:</b>	<b>Qwest</b>	<b>Date:</b>	<b>6/14/2001</b>
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**Verification of Resolution**

Qwest has addressed the previous issue of the lack of communicating software changes that were outside of a scheduled IMA software release. Qwest's outlined processes prevent this from happening in the future. CGEY is satisfied that this issue has been resolved.

<b>Verification completed by:</b>	<b>Scott Fraser</b>	<b>Date:</b>	<b>8/8/01</b>
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**TAG Recommendation**     **Approved**                       **Return to Qwest**



**Exhibit C**

<b>TAG Acceptance by:</b>		<b>Date:</b>	

Date:

## **EXCEPTION REPORT**

An exception has been identified as a result of the test activities of the pseudo-CLEC.

### **Exception:**

Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases.

### **Background:**

When implementing a new IMA EDI release, Qwest makes available a series of documents to co-providers to assist them in their certification and implementation efforts. Qwest's Co-provider Industry Change Management Process (CICMP) organization handles the process of tracking releases and notifying co-providers of release information and schedules. Qwest develops the scheduling of IMA releases internally, and posts the targeted timeline of release dates in a calendar on the CICMP web page.

During the P-CLEC's EDI implementation kick-off meeting, Qwest did not provide details relative to the process by which it plans and schedules EDI releases. However, the P-CLEC presumes that the CICMP calendar is based upon the IMA Matrix in Qwest's Release Notification Enhancement document found on the CICMP web page.<sup>1</sup>

Based upon the P-CLEC's experience in implementing EDI Release 6.0, Qwest has not followed its established release timeline. Because of Qwest's deviation from the posted release schedule, the P-CLEC experienced implementation planning, resource scheduling, and quality assurance issues.

The attached spreadsheet provides a comparison between Qwest's expected release timeline, as defined in the IMA Matrix,<sup>2</sup> the CICMP calendar's posted release notification delivery dates, and the actual dates that the P-CLEC received Qwest release notifications. As the attachment shows, on many occasions, Qwest delivered release notifications late. Specifically, Qwest published the Release 6.0 Recertification Notice on the same day it released IMA 6.0, three weeks after its projected delivery date. Qwest's Release Notes Descriptions, which should have been delivered six weeks prior to the target release date, on October 11, 2000, were not received by the P-CLEC until October 27, 2000.

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<sup>1</sup> [http://www.qwest.com/wholesale/downloads/enhancement\\_120600.ppt](http://www.qwest.com/wholesale/downloads/enhancement_120600.ppt).

<sup>2</sup> The projected release timeline was determined by counting backward the number of days or weeks stated in the IMA Matrix from Qwest's stated target release dates of December 11, 2000 for Release 6.0 and February 26, 2001 for Release 6.01.

## EXCEPTION 2003

### Qwest OSS Evaluation

Exhibit C

Further, when Qwest provides release notifications to the co-provider community, it does not always provide complete and accurate information. For example, though Qwest published the Release 6.0 Baseline Candidates only one day after the date listed on the CICMP calendar – and approximately three weeks earlier than the projected delivery date based on the IMA Matrix timeline – Qwest had to release a clarification to the Baseline Candidates on August 23, 2000 – more than one month after the CICMP calendar delivery date, and nearly two weeks after the IMA Matrix-defined projected delivery date.

Qwest also released two addenda to its EDI Release 6.0 Disclosure Documents. These addenda were published after the release of IMA 6.0 to correct errors in the original Disclosure Documents.

The P-CLEC found the implementation of the two addenda to be cumbersome due to its impact on the integrity of the EDI mapping applications and the piece-meal nature of arriving at a complete set of business rules specifications. Additionally, the P-CLEC found the analysis of the change summaries to be confusing due to a lack of clarity as to how to incorporate the content in the second disclosure document addendum. *Specifically, it was not evident whether the second addendum was inclusive of the changes noted in the first addendum.* Qwest does not provide a documented process that details how a co-provider should implement changes noted in the disclosure document addenda.

#### **Issue:**

Because Qwest has not adhered to its stated implementation timeline, co-providers have not been afforded adequate time to prepare for implementation of new releases. Co-providers must complete their analysis, development, and testing efforts within a shortened time frame, which creates greater opportunity for errors to occur in a co-provider's implementation efforts.

Further, the incomplete nature of Qwest's release notifications further complicate co-providers' certification efforts by forcing co-providers to work with continually changing documentation. Qwest's inability to provide complete and accurate release documentation in its initial delivery of release notifications greatly increases the time and resources a co-provider must commit to implementing a new IMA EDI release.

#### **Impact:**

*If Qwest does not meet its established timelines for the publishing of IMA EDI release documentation, co-providers will not be able to make a smooth transition from their current EDI release to a new release.* Further, multiple and frequent changes to release documentation causes co-providers to expend additional time and resources on release documentation that is not necessarily complete or accurate. These frequent and voluminous changes to release specifications will lead to the failure of co-providers' implementation efforts, and will, ultimately, delay co-providers from entering into production in a new release and executing their business plans.

**EXCEPTION 2003**  
Qwest OSS Evaluation

**Exhibit C**

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Date: October 19, 2001

## OBSERVATION REPORT

An observation has been identified as a result of the test activities of the Pseudo-CLEC (P-CLEC).

### Observation:

The P-CLEC observed that Qwest did not provide sufficient notification to the CLEC community for meetings held as part of its Change Management Process (CMP).

### Background:

Between September 21 and September 26, 2001, the P-CLEC received three separate notifications for Qwest CMP product meetings that did not provide sufficient advance notification for the P-CLEC to schedule resources for the meeting. The details of these notifications are as follows.

On September 21, 2001, at 11:59 a.m. MT, the P-CLEC received a memorandum through Qwest's CMP Product/Process distribution list meetings for clarification of two separate Change Requests (CR). The first meeting identified in the notice, to discuss CR #090401-4, was scheduled to occur the same day, September 21, at 2:30 p.m. MT. The second meeting, related to CR #091001-1 was scheduled to be held two business days later, on September 25, 2001 at 1:00 p.m. MT.

At 11:03 a.m. MT on September 25, 2001, the P-CLEC received a notification, also through the CMP Product/Process distribution list, indicating that a meeting was to be held on that day at 1:00 p.m. MT to discuss CR #090601-1. Additionally, at 12:14 p.m., a second notice was sent out by Qwest stating that the meeting time provided in the first notification was incorrect, and that the meeting would begin at 1:30 p.m. MT.

Finally, on September 26, 2001 at 11:30 a.m. MT, the P-CLEC received a notification via the CMP Product/Process distribution announcing two CR clarification meetings for CR #091201-1 and CR #091001-1. These meetings were to be held on September 26, 2001 at 12:30 p.m. MT, and September 27, 2001 at 10:00 a.m. MT, respectively.

### Issue:

In a one-week period, the P-CLEC received three Qwest CMP notifications in which there was not sufficient advance notice to enable the P-CLEC to ensure the appropriate resources were in attendance at the meetings. The period of advance notice for the five meetings addressed in the identified notifications ranged from one hour to two business days. In response to Observation 2035, addressing the insufficient notice of scheduled change management meetings, Qwest stated

*It is Qwest's policy that meetings are announced no less than one week prior to the event based on CLEC requests.*

**Observation 2058**  
Qwest OSS Evaluation

**Exhibit C**

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The abbreviated advance notice of the five meetings cited above indicates that Qwest is not abiding by its own stated policies.

**Impact:**

If Qwest does not provide sufficient advance notice for its CMP meetings, co-providers may be unable to schedule the appropriate personnel to attend those meetings that may affect the products and services they provide or plan to provide to their customers.

**MEMORANDUM**

**DATE:** July 13, 2001  
**TO:** ROC TAG  
**FROM:** Martha McMillin, Hewlett-Packard Consulting  
**RE:** Qwest Supplemental Response to Exception 2003

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**Summary**

As documented in the Exception, Qwest does not follow its established release notification schedule when implementing IMA releases, and does not provide complete and accurate information in its release notifications to enable co-providers to prepare adequately for certification and implementation of new releases. Co-providers must complete their analysis, development, and testing efforts within a shortened time frame, which creates greater opportunity for errors to occur in a co-provider's implementation efforts. Further, Qwest's inability to provide complete and accurate release documentation in its initial delivery of release notifications greatly increases the time and resources a co-provider must commit to implementing a new IMA EDI release.

**Discussion**

Based upon the P-CLEC's experience in implementing EDI Release 6.0, Qwest did not follow its established release timeline, as posted on the CICMP website calendar. Because of Qwest's deviation from the posted release schedule, the P-CLEC experienced implementation planning, resource scheduling, and quality assurance issues. In the Exception, the P-CLEC provided a table comparing the targeted release dates of IMA 6.0 Release Notifications, and the actual dates on which the release notifications were distributed by Qwest. Among the late release notifications, Qwest provided the 6.0 Recertification Notice on the same day Release 6.0 was implemented and three weeks after the projected delivery date.

Further, this Exception noted that Qwest release notifications do not always provide complete and accurate information. As examples, the Exception cited Qwest's release of a clarification to the Release 6.0 Baseline Candidates on August 23, 2000 – more than one month after the CICMP calendar delivery date (July 20, 2000) and the release of the initial Baseline Candidates notification (July 21, 2000). The Exception also reported that Qwest had to release two addenda to its EDI Release 6.0 Disclosure Documents, published after the release of IMA 6.0 to correct errors in the original Disclosure Documents.

The P-CLEC found the implementation of the two addenda to be cumbersome due to its impact on the integrity of the EDI mapping applications and the piece-meal nature of arriving at a complete set of business rules specifications. Additionally, the analysis of the change summaries was confusing because it was not evident whether the second addendum was inclusive or exclusive of the changes noted in the first addendum. This confusion is compounded by the fact that Qwest does not provide a documented

process that details how a co-provider should implement changes noted in Disclosure Document addenda.

In Qwest's response to the cited issues, it indicated that it does not believe this Exception documents a problem with its systems or processes. Qwest indicated that, during the EDI implementation process with a co-provider, Qwest provides a timeline of when Release Notifications were and will be published and made available to the co-provider, and stated it believes this process adequately addresses the necessary implementation planning and scheduling activities. Qwest noted that, while it is desirable to meet or exceed all published target release dates, there is a notice on the CICMP Release Calendar that all proposed IMA release dates are only targets and changes may occur during an IMA release life cycle that impact these target dates. Should changes occur, Qwest stated it would update its target dates and communicate this to the co-provider.

With respect to the Exception's use of the delayed IMA 6.0 Re-certification Notice, Qwest indicated that, during the conversion to a new IMA EDI Release, it is the co-provider's responsibility to initiate the migration process. An initial migration meeting will be held to discuss re-certification, migration strategy and data conversion. A project plan will be developed and mutually agreed upon to assist in the scheduling of appropriate resources for the migration.

### **Recommendation**

HP does not believe that Qwest has fully addressed the issues raised in this Exception. First, while Qwest notes that its published target release dates may change during the life cycle of an IMA release, Qwest has not addressed the impact that such delays have on a co-provider's ability to accommodate and plan for new release implementations on a shortened timeframe. Co-providers plan their release implementations based on the release calendar provided by Qwest. If a co-provider cannot be assured that targeted release dates will be met, it will have difficulty coordinating the necessary resources to implement the new release. Further, when a documentation release is delayed, co-providers must alter their development and implementation plans to ensure that the appropriate resources are available to complete the necessary review and development in the shortened timeframe.

Second, Qwest indicated in its response that the co-provider is responsible for initiating the migration process to a new release, and that, consequently, its publishing of the IMA 6.0 Re-certification Notice three weeks behind schedule, and on the same date IMA Release 6.0 was implemented, does not constitute a problem. While HP accepts that the co-provider may be responsible for initiating migration to a new IMA release, this does not remove from Qwest the responsibility to notify co-providers in a timely manner that re-certification and migration plans need to be developed. The Re-certification Notice is important to co-providers in their planning for the migration process in that it provides the timeframes in which re-certification must be completed.

Third, in addition to Qwest's delayed publishing of Release Notifications, this Exception also addressed the issue of Qwest's frequent re-release of Release Notices and Disclosure Documentation. As was documented in the Exception, when Qwest

releases addenda to its documentation, co-providers are forced to develop their interfaces in a piece-meal fashion and often have to re-code their EDI maps to account for changes to Qwest's business rules specifications. This requires co-providers to devote additional time and resources to the development and implementation of new IMA releases. In its response, Qwest did not address this deficiency in its release change management process.

HP recommends that this Exception remain open pending the outcome of the current ROC TAG review of proposed Change Management Performance Indicator Definitions (PIDs). Of the Change Management PIDs under consideration, this Exception directly correlates to "PO-16 Timely Release Notifications," proposed by Qwest and "RQ-3 Release Quality," proposed by the co-provider community. Implementation of these PIDs will require Qwest to resolve the root cause of the issues cited in this Exception in order to meet established benchmark performance standards.

Further, HP requests clarification with regard to the multiple releases of Disclosure Document addenda and release notifications cited in this Exception, as these multiple releases have a significant effect on the quality and reliability of an IMA EDI Release, and impact a co-provider's ability to plan, develop, test and implement its EDI interface. The attached table<sup>1</sup>, identifying the multiple revisions and addenda to the IMA Release 6.0 Disclosure Documents, shows the magnitude of this impact on co-providers.

### ***Qwest Supplemental Response to HP Comments (June 28, 2001):***

Qwest is making a proposal to change its change management program to meet the needs of the industry and align Qwest with evolving industry directions. To this end, Qwest is working this issue in the regulatory workshops and the CICMP Forum and has prepared a proposal for collaborative development of a change management program that will address the concerns raised in this and other observations. The details of the program will be collaboratively refined with the CLECs in the Qwest CICMP forum. Qwest has identified and expects the program to contain the following elements, some of which address the issues raised in this observation. For example:

- On a quarterly basis, Qwest would begin sharing with Co-Providers its 12-Month Development View (View) that includes all proposals that impact Co-Providers—those initiated by Qwest and Co-Providers. Co-Providers would then have an opportunity to provide Qwest with input to the development plan.
- Qwest proposes to improve its application-to-application notification process to meet the requirements proposed by the industry's Ordering and Billing Forum (OBF) with Issue 2233. Qwest proposes to incorporate into the CICMP Qwest initiated CRs which impact Co-Providers, classify and prioritize CRs by severity type and collaborate with CLECs to develop system releases that include and meet regulatory, system and CLEC requirements.
- *In addition, Qwest's proposal will include guidelines and procedures for:*
  - Escalations/Expedites of changes
  - New and/or Retired Interfaces
  - Change notification for Products/Processes

<sup>1</sup> EXC2003 HP Reply Attachment

Qwest believes that this comprehensive and collaborative approach to change management will address these issues and align Qwest with the direction the industry is taking with change management. Additional information/details will be available once the work in regulatory workshops and with the CLECs has concluded.

Qwest is in ongoing negotiations with the ROC TAG to arrive at agreement on two Change Management Performance Indicator Definitions (PIDs). The Change Management PIDs under consideration include "PO-16 Timely Release Notifications," and "GA -7 Software Outage Resolution". A meeting was held June 20<sup>th</sup> to review the latest drafts of these proposed PIDs. In that meeting tentative agreement was reached on PO-16. Formal TAG approval is expected in the June 28<sup>th</sup> TAG meeting. Qwest needs to provide a response to two outstanding issues on GA -7 and expects approval upon satisfactory resolution of these two issues. Implementation of these PIDs will require Qwest to resolve the root cause of the issues cited in this Exception in order to meet established benchmark performance standards. Qwest does not support the third Change Management PID, "RQ-3 Release Quality," proposed by the co-provider community. This PID proposal is at impasse and under review by the ROC Steering Committee.

### ***HP Supplemental Recommendation (July 13, 2001):***

HP agrees with Qwest's proposal in their Supplemental Response dated 6/28/2001:

*"Qwest is making a proposal to change its change management program to meet the needs of the industry and align Qwest with evolving industry directions."*

Due to the nature of the complexity of the solution to this Exception and the length of time it will take for Qwest to implement, HP recommends that this Exception remain open pending the successful implementation of the changed CICMP process.

Based on Qwest's Agenda provided for the July 11<sup>th</sup>, 2001 "CLEC/Qwest working session to modify the Change Management Process", there will be a timeline adapted for proposal review with the CLEC community.

And further based on the outcome of the timeline development, HP will provide an update to this Exception recommendation on a quarterly basis.

### ***AT&T Comments:***

Qwest proposes changes to its CICMP as the means to resolve the issues raised by this Exception. HP notes that implementing those changes will take a good deal of time, and proposes that the Exception be kept open until its evaluation of the revised Qwest Change Management Process ("CMP") is completed.

These issues beg the question of defining the later evaluation as the continuation of testing of the Qwest Change Management Process or as a restart of testing. It is not clear whether Test 23 is "paused" or is being continued.

The Master Test Plan describes Test 23, the Change Management Process test. It's objective "... to determine the adequacy and completeness of procedures for developing, publicizing, conducting, and monitoring change management." On the

basis of this Exception, it appears that Qwest's current CICMP cannot serve as the basis for successful testing of Qwest's Change Management Process. However, a documented Change Management Process is one of the inputs to Test 23 – see 23.6.1 Test Inputs Items 1, 2, and 3.

AT&T questions:

- Is it KPMG/HP's intent to use the revised CMP for Test 23?
  - If yes, which release will be used for that test? See 23.6.1 Test Inputs item 4. "One significant software release that has been recently implemented"
  - If no, which CMP is planned for Test 23?
- Is it KPMG/HP's intent to continue testing the Change Management Process to evaluate other aspects of Qwest's release notification and CLEC support capabilities? See MTP Table 23.4.1 and 23.6.2 Test Activities.
- Is it KPMG's intent to "pause" Test 23 until the revised Change Management Process is available?

The following table identifies the multiple revisions that have been released for the IMA Release 6.0 Disclosure Documents. Each row of the table notes the chapters of the Disclosure Documents that were revised and the date of each revision. Fifty-three chapters and three appendices were included in the initial release on December 8, 2000. Three revisions have been released, updating and revising certain chapters. In addition, five addenda were added and released between January 15, 2001 and March 27, 2001.

Chapter	Title	Draft 11/20/00	Release 12/08/00	Revised 01/29/01	Revised 02/19/01	Revised 03/23/01
00	Table of Contents	X	X			
01	Main Introduction	X	X			
02	EDI Introduction	X	X			
03	Customer Service Record Transaction Cycle	X	X	X	X	
04	Address Validation Transaction Cycle	X	X	X		
05	Check Facility Availability Query	X	X			
06	Service Availability Transaction Cycle	X	X			
07	CFA Validation Transaction Cycle	X	X			
08	Appointment Reservation Transaction Cycle	X	X			
09	Telephone Number (TN) Assignment Transaction Cycle	X	X			
10	TN-Appointment Cancellation Transaction Cycle	X	X			
11	DLR Return	X	X	X		X
12	Meet Point Validation	X	X	X	X	
13	Raw Loop Data	X	X	X	X	
14	POTS Resale Order Submittal	X	X	X		
15	PBX Order Submittal	X	X	X	X	
16	Local Number Portability Transaction Cycle	X	X			
17	Interim Number Portability (INP) Order Submittal	X	X			
18	Unbundled Loop order Submittal	X	X			
19	Unbundled Loop with NP Order Submittal	X	X			
20	Unbundled Analog (ANA) Line-Side Switch Port	X	X			
21	Unbundled Digital Line-Side Switch Port	X	X	X		
22	Resale Private Line Order Submittal	X	X			
23	Centrex Resale Services	X	X	X	X	
24	BRI ISDN Resale Order Submittal	X	X			
25	Directory Listing (Simple) Feature	X	X			
26	Directory Listings Only Feature	X	X			
27	Resale Frame Relay	X	X			
28	Megabit Resale	X	X			

Character	Title	Draft 11/20/00	Release 12/08/00	Revised 01/29/01	Revised 02/19/01	Revised 03/23/01
29	Public Access Line Ordering	X	X			
30	Public Access Line Ordering - PSP	X	X			
31	Centrex 21 Resale Services	X	X			X
32	DID In Only Trunk	X	X	X	X	
33	Design Trunk Resale	X	X			
34	Unbundled Analog DID-PBX Trunk	X	X			
35	DS1 DID-PBX Trunk Port Facility	X	X	X		
36	DS1 DID-PBX Trunks	X	X			
37	Unbundled Feeder Loop	X	X	X		
38	Unbundled Distribution Loop	X	X	X	X	
39	Unbundled Distribution Loop with Number Portability	X	X	X	X	
40	Shared Loop	X	X	X	X	
41	UNE -P POTS	X	X	X		
42	UNE -C PL	X	X			
43	PRI ISDN Facility	X	X	X		
44	PRI ISDN Trunks	X	X	X		
45	UNE -P BRI ISDN	X	X			X
46	Fatal Error Response Transaction	X	X			
47	Non-Fatal Error Response Transaction	X	X			
48	Jeopardy Transaction	X	X			
49	Firm Order Confirmation (FOC)	X	X	X		
50	Completion Response Transaction	X	X			
51	Service Request Status Inquiry Transaction	X	X			
52	Status Change Inquiry - Auto Push	X	X			
53	Functional Acknowledgement Response Transaction Cycle	X	X			
A	Developer Worksheets - Pre-Order	X	X	X		X
B	Developer Worksheets - Order	X	X	X	X	X
C	Developer Worksheets - Post-Order	X	X	X		
6.0 EDI Disclosure Addendum Version 1					01/15/01	
6.0 EDI Disclosure Addendum Version 1 Correction Update					01/29/01	
6.0 EDI Disclosure Addendum Version 2					02/26/01	
6.0 EDI Disclosure Addendum Version 3					03/23/01	
6.0 addendum 3 Correction Update					03/27/01	



**Draft List of Issues Deferred to Change Management Process**

Issue	Workshop Transcript Reference; SGAT Reference
<p>How CMP is designed to accommodate the language in SGAT Section 1.7.1.</p>	<p>SGAT Section 1.7.1 states, in part, as follows:                       "Notwithstanding the above, if the Commission orders, or Qwest chooses to offer and CLEC desires to purchase, new Interconnection services, access to additional Unbundled Network Elements, additional ancillary services or Telecommunications Services available for resale which are not contained in this SGAT or a Tariff, Qwest will notify CLEC of the availability of these new services through the product notification process through the CICMP."</p>
<p>Changes in LIS trunk intervals (§ 20 of SGAT; Issue CM-19)</p>	<p>CO Wkshp 2, 1/25/01 Tr. pp. 23-24                      CO Wkshp 6, 8/22/01, Tr. pp. 323-329</p>
<p>Improvement or modification of Disaster Recovery plans. How is CMP designed to accommodate the language in Section 12.2.1.8 of the SGAT to improve or modify interface contingency plans and disaster recovery plans.</p>	<p>Multi-State Wkshp 4, 6/27/01, Tr. pp. 184 – 185.                      SGAT Section 12.2.1.8:                       "Qwest will establish interface contingency plans and disaster recovery plans for the interfaces described in this Section. Qwest will work cooperatively with CLECs through the CICMP process to consider any suggestions made by CLECs to improve or modify such plans. CLEC specific requests for modifications to such plans will be negotiated and mutually agreed upon between Qwest and CLEC."</p>
<p>Proper reasons for rejection of an order being discussed through the CMP process.</p>	<p>AZ Wkshp 5, 5/17/01, Tr. p. 1872-1873</p>
<p>Changes in business rules &amp; processes that would affect the rejection of an LSR, or otherwise impact ordering processes, will be subject to CMP.                       The language in Section 12.2.6 is still open. How will the redesigned CMP address this?</p>	<p>Multi-State Wkshp 4, 6/27/01, Tr. pp. 248-252                      Multi-State Wkshp 4, 6/28/01, Tr. p. 14.                       SGAT Section 12.2.1.9.6 states that "Business rules regarding rejection of LSRs or ASRs are subject to the provisions of Section 12.2.6."</p>
<p>Cross-reference to EELs in the Unbundled Loop Tech. Pub., because EELs are made up of loop and transport and other UNE tech pubs make reference to combinations. Should see in the modified documents sent through CMP.</p>	<p>AZ Wkshp 5, 5/16/01, Tr. pp. 1583-1587.</p>

Exhibit D

<p>Process for notifying CLECs of where Qwest is placing major facility builds (came out of CLEC desire to know if Digital Loop Carriers are used as primary relief technology). Qwest wanted to run this through CMP.</p>	<p>AZ Wkshp 5, 5/15/01, Tr. pp. 1374-1376</p>
<p>Stand-alone EDI Test Bed discussed in workshops and Qwest stated that it was working through CMP on this issue</p>	<p>WA Wkshp 4, 3/13/01, Tr. p. 3067          AZ Wkshp 4, 4/10/01, Tr. pp. 1423 –1425          Multi-State Wkshp 3, 3/28/01, Tr. pp. 5-6          CO Wkshp 4, 2/22/01, Tr. pp. 17, 30</p>
<p>Processes for CLECs to order Loop plus MUX. Supposed to be brought to CMP.</p>	<p>Multi-State Wkshp 3, 5/1/01, Tr. p. 36-37          Multi-State Wkshp 3, 5/2/01, Tr. pp. 208-209.</p>
<p>Changes in policy re: Circuit Ids. CLECs wanted a way for Qwest to provide the circuit ID information, if CLEC sought the information from Qwest. Supposed to be addressed in CMP.</p>	<p>Multi-State Wkshp 3, 5/1/01, Tr. pp. 38-39, 327 – 335</p>
<p>Way to identify NCNCI codes depending on spectrum to be used (9 spectrum classes). NCNCI code for spectrum management. Qwest had not yet established the codes. Qwest was targeting between third and fourth quarter to identify. New codes to go through CMP.</p>	<p>Multi-State Wkshp 3, 1/1/01, Tr. pp. 229-2315</p>
<p>What physically happens to the order if Qwest issues a jeopardy notice and a new appointment date is scheduled with CLEC? (discussion about SGAT Sections 9.2.2.9.3 and 9.4).</p>	<p>Multi-State Wkshp 3, 5/1/01, Tr. pp. 185-188.</p>
<p>Intervals for rescheduled UNE loop cut-overs if it doesn't occur on the due date. Is there a <i>minimum 5 day interval</i> for the rescheduled order? Interval for supplementing loop orders.</p>	<p>CO Wkshp 5, 5/25/01 Tr. pp. 118-121,</p>
<p>Quick Loop with LNP. Qwest envisioned it would go to CMP.</p>	<p>Multi-State Wkshp 3, 5/1/01, Tr. pp. 31-31</p>

**Exhibit D**

<p>Draft engineering practices and procedures Qwest believe should be used when there's access at a building terminal (at MTEs).</p>	<p>CO Wkshp 5, 4/19/01, Tr. pp. 128 - 131</p>
<p>Ability of CLEC to order repeaters ("Extension Technology") found in SGAT Section 9.2.2.5. The process for ordering was to go through CMP.</p>	<p>CO Wkshp 5, 4/18/01, Tr. 89-90</p>





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1875 Lawrence Street  
Denver, CO 80202

**To:** Matt Rossi and Mark Routh

**From:** Donna Osborne-Miller

**Date:** July 6, 2001

**Re:** AT&T's Comments relative to a Revised CICMP Process

**AT&T CICMP members have reviewed Attachment J of the CICMP distribution package from our meeting last month. It is our desire that this effort will be a collective one that is *communicative and collaborative among all participants*. We believe an important driver to be OBF 2233. It is a critical piece in laying the groundwork for a change management process.**

**Lynne Powers has captured, in her memo to you on July 5<sup>th</sup>, the concerns of the Co-Provider community. Though there will be a number of issues and concerns that arise through our work toward change in our process as it is today, there is another item that AT&T would like to appropriately address that we did not see in Eschelon's memo; that is a need for a dispute resolution process, to be conducted by an independent third party.**

**We look forward to this opportunity to work with Qwest and the Co-Provider community to create a process that is truly collaborative, that takes the interests of the CLEC community into account, and that provides CLEC's with a meaningful role in the important systems and processes that fall under CICMP.**

**To: CICMP Redesign Team**

**From: AT&T Redesign Members**

**Date: August 13, 2001**

**Re: Comments Concerning the August 7<sup>th</sup> and August 8<sup>th</sup> Meetings**

**AT&T submits this memo regarding our major concerns arising from last week's CICMP redesign meetings. There are essentially five areas of concern that we would like to discuss at our next meeting; they include: (i) clarifying and documenting voting requirements; (ii) defining the scope of the change management process for OSS and product or policy changes; (iii) clarifying KPMG's role in the redesign process as well as meetings; (iv) discussing Category 3 Exception changes; and (v) using CICMP as a mechanism for Qwest to demand amendments to interconnection agreements. What follows is a synopsis of our questions in regard to each of these five topics.**

- I) VOTING - What are the precise rules for voting? If there are voting rules, where are they documented, and shouldn't Qwest distribute these documents to the group? We have not discussed, in any of our meetings, what happens when there is a dead-lock in the vote as between the combined CLEC vote and the Qwest vote or for votes taken between the CLECs. What are the escalation procedures in the case of deadlocks? So that we can avoid any future uncertainty, AT&T requests that Qwest and the CICMP participants discuss these questions and create documentation that clearly describes voting rights and obligations along with the resolutions to these and any other questions that arise.**
  
- II) SCOPE- We have not seen Qwest's proposal on the "scope" of this redesign effort. As we continue to meet, it becomes clear that the scope or a purpose statement is critical to the work in which we embarking. Without this, it does not appear that we have a clear sense of direction as we move forward in creating the change management process.**
  
- III) KPMG - We would like clarification on KPMG's role in the redesign meetings. We are unclear why KPMG is present. While we appreciate Sam's assistance with the naming convention proposal in one of last week's discussions, in fairness, KPMG's role should be at most to observe, and primarily to evaluate Qwest's redesigned end-product as opposed to creating or influencing the end-result.**

- IV) **CATEGORY 3 Exception Changes – Our notes reflect that Qwest would like to discuss category 3 out of order. This category deals with product, process and technical changes. We believe that it is inappropriate and premature to talk about exception changes at this point in our discussion. In particular, it is wholly inappropriate to take-up category 3 while skipping categories 1 and 2.**

**Because Qwest chose to discuss the CICMP process in so far as it relates to OSS first, our efforts should concentrate on completing OSS first before we jump to other topics, and in no event should we skip around in another topic.**

- V) **AT&T notes that when Qwest submits a Release Notification, particularly in the context of product, process and technical changes, many such notifications appear to unilaterally demand that the CLECs must adopt such changes by a date certain regardless of what their respective interconnection agreements state. AT&T believes this approach is contrary to our contract rights, and we request that the CICMP group discuss this process either now or in relation to future discussion regarding product, process and technical changes in the CICMP redesign process.**

TO: Qwest CMP Re-design Team

FROM: AT&T Redesign Members

Date: September 14, 2001

Re: Comments Concerning the September 5<sup>th</sup> and 6<sup>th</sup> Re-design Meetings

Several items came up at last week's Change Management Process re-design meeting that concern the AT&T team. Generally, we find that Qwest has been changing the rules of the game as this re-design has proceeded and that this must stop in order for Qwest and the CLECs to make any meaningful progress. We have identified some specific examples below.

1. Re-design Documentation. From early in this process, the CLECs and Qwest agreed that we would work from the OBF 2233 document and reflect changes made and other agreements reached in that document. We clarified at the August 14, 2001 meeting that the comments made in the version we were working from should be transferred to version 1 of the OBF 2233 document and brought to last week's meeting. That work was not done by the time we got to the meeting last week. Qwest brought a new document entitled "CLEC-Qwest Change Management Process" with the latest draft date of August 31, 2001, which we had never seen. It was apparent that Qwest expected CLECs to work from this August 31, 2001 document, which was not complete and the source of which is not clear. Moreover, this document reflected seven "draft" dates from 9/10/99 through 5/11/01. These are all dates that precede the CMP re-design and don't mean anything to AT&T.

AT&T's expectations are that: (a) this process will drive the preparation of complete documentation that thoroughly describes how CICMP will work, (b) the parties will proceed section by section through the OBF document to the greatest extent possible and (c) Qwest will prepare this documentation and distribute updated redlined copies of such documentation in advance of every re-design meeting so that CLECs have the opportunity for review prior to the next re-design meeting. It is AT&T's understanding that OBF 2233 v. 1 is the starting point for the preparation of the necessary documentation.

2. Re-design or Augmentation? At the re-design meeting this week, a Qwest person, whom we understand may be a Qwest witness in the 271 proceedings, attempted to "correct" everyone in attendance by stating that we are involved in an "augmentation" rather than a "re-design" of the change management process. This is curious since all of the minutes and other documentation generated by Qwest since this process began refers to "re-design." That tells us that Qwest is

confused; not the CLECs. What we call it is perhaps not as important as what we are doing. So, from AT&T's perspective, we are in fact re-designing a process that is not collaborative, that takes too long, that is deficient, and that does not work well. This is consistent with the comments CLECs provided to Qwest in July. Qwest, by engaging in this process, clearly acknowledges this. Please let us stick with the task at hand and not confuse the issue with unnecessary changes in terminology. AT&T will continue to refer to this process, and treat it, as a re-design. We will encourage other CLECs to do the same.

3. Following the Existing Process. Last week, Qwest called a meeting of a few CLECs (four, at most) to make a decision regarding an LNP issue in the Qwest product catalog. This was an issue that Qwest had not brought before the CLECs in the CMP via a change request, as is the current process. In addition, Qwest chose not to address this matter at a CMP meeting. Just the same, Qwest attempted to have the few CLECs who participated in this call vote, as if to make a binding decision for all CLECs regarding the PCAT changes. At that meeting, AT&T and Sprint clearly stated that they were not in a position to vote and expressed concern about the nature of the meeting. The fact is, Qwest went out of process to try to get a change to its PCAT approved by CLECs to serve a Qwest purpose. This has never been an option available for CLECs. When a CLEC wants to propose changes, it must submit a change request in the CMP. As Qwest knows, the same process requirement applies to Qwest. In response to Qwest's desire to define possible exceptions to the strict requirement to submit a CR, the CLECs and Qwest discussed an interim process for emergency situations. While we do not agree that the situation that arose last week fits into this category, we recognize there may be times when an emergency process may be appropriate.

4. Voting. At the very first meeting held on July 11, CLECs and Qwest agreed to the guiding principle: "One vote per Corporate Entity with majority rules." This is reflected in the meeting minutes. On July 19, 2001, we conducted a vote regarding software vendors where each entity cast a single vote and the majority prevailed. Then at the August 7 meeting, July Lee wanted to "clarify" the voting. As far as the AT&T team was concerned, no clarification was needed. *We understood just fine, until Ms. Lee "clarified" for everyone what Qwest meant: "One vote per corporate entity with majority rules in CLEC community and one vote for Qwest, making every effort to reach consensus."* As far as AT&T is concerned, that was not a clarification, it was an outright change in the process. Apparently, even Mark Routh was confused because our attorneys have pointed out to us that in a Colorado PUC hearing, held on August 23, 2001, Mr. Routh stated under oath that CLECs each get a vote and that Qwest gets a vote with the majority prevailing. When asked the following question: "So if there are eight CLECs and then Qwest, there are nine votes and majority rules?"; he stated, "That's correct." You will note that this was sixteen days after the CMP re-design meeting where Ms. Lee made the "clarification."

## **Exhibit E**

Based on the changes in position we have observed since July 11, 2001, this team has to say that this process seems less collaborative as time goes on. We are losing confidence in Qwest's ability to meet it's commitments.

TO: Qwest CMP Re-design Team

FROM: AT&T Redesign Members

Date: October 10, 2001

Re: Comments Concerning the October 2<sup>nd</sup> and 3<sup>rd</sup> CMP Re-design Meetings

This memo is a follow-up to the CMP Re-design meeting last week.

1. Qwest Documentation (Tech Pubs, PCAT and other Product Documentation)

a. Last week, we discussed an interim process for changes to Qwest documentation. We look forward to the commencement of this process, however, cannot recall whether Qwest stated during the meeting when the process would start. Would Qwest please provide by the next CMP Re-design meeting, the date on which this new process will commence (e.g., the documents will be red-lined, the historical change log will be included and Qwest will use the CR process when the change is CLEC-impacting).

b. An important part of the discussion on this topic, which has not yet been resolved, is the process Qwest intends to follow for documents previously modified as a result of the 271 workshops, but not distributed and noticed to all parties in a way that allowed for a meaningful review (changes were not identified, agreements from 271 workshops were not identified, etc.). We understand that Qwest will provide a response to this concern by the next CMP Re-design meeting, if not sooner.

2. Scope of CMP

We note that the Hearing Examiner for the Colorado Public Utilities Commission issued the report on the Colorado Performance Assurance Plan (CPAP) on September 26, 2001. While this report is still subject to comment, we observed that there are two references in the report that relate to CMP:

a. Paragraph 14.3 of the CPAP (Issue 7 in the report) indicates that the change management process, once re-designed and in place, will be followed to obtain approval when Qwest wishes to make any CLEC-affecting changes to the Performance Measurement and Reporting System.

b. Paragraph 18.8 of the CPAP deals with CLEC or Qwest seeking to modify a Performance Indicator Definition (PID) outside of the six-month review process called for in the CPAP. This provision states that the Independent

Monitor and the Commission are more likely to approve a change to a PID "if it has been approved by another forum such as the ROC or CMP (if PIDs are ultimately included within the scope of CMP)."

It seems that the CMP Re-design group should discuss these aspects of the Colorado Commission's order and come to an agreement on how to address the changes identified in paragraph a. above. With regard to paragraph b., a discussion about whether to include changes to PIDs in the CMP would be appropriate as well.

3. Voting

At the last meeting, a couple of items came to a vote. Tom Dixon of WorldCom raised the question of whether we were following the draft Procedures for Voting and the Impasse Resolution Process that were established for CMP Re-design. It appeared that we did not strictly follow the process outlined in that document. For example, the document states:

Participants at a working session will determine if there are any issues requiring a vote at the next working session. If there is an issue requiring a vote, the agenda for the next working session will reflect the item. In addition, the agenda will be distributed to the CLECs and posted on the CICMP Re-design web site a week in advance of the session.



**To:** Matt Rossi & Mark Routh  
**From:** Lynne Powers  
**Date:** July 5, 2001  
**Re:** Eschelon's Comments on the Qwest CICMP Restructure

---

On June 26, 2001, Qwest distributed a Proposal for restructuring Qwest's Co-Provider Industry Change Management Process ("CICMP"). Qwest requested comments by July 6, 2001. Separately, I provided to you a Memorandum, on behalf of the CLEC Forum, regarding scheduling issues and the CLEC's proposal that the Ordering and Billing Forum ("OBF") 2233 document be used as a basis for the Qwest CICMP Restructure discussion. Eschelon supports those recommendations and also provides these written comments on the Qwest CICMP Restructure.

In its cover email on June 26<sup>th</sup>, Qwest described its five-page Proposal as a "high level" approach. Because Qwest's proposed approach is high level only, it does not provide information about the specific nature of the restructure that is sufficient to allow CLECs to discern whether the approach is a workable one. Eschelon hopes that Qwest and the CLECs will be able to work through the needed details together over the next several months to arrive at a mutually acceptable approach. Such an approach should provide sufficient detail to provide notice to participants about the process and allow smooth implementation of the restructure. The OBF 2233 document provides the kind of specific, detailed information that is needed by CLECs to understand and rely upon the process. That document and the PIDs also include the kinds of metrics that are needed with respect to CICMP. Intervals need to be established for the distribution of Qwest's change management notification and documentation, and metrics are needed to report Qwest's compliance with those intervals.

Eschelon was pleased to read in Qwest's Proposal that Qwest will begin sharing with CLECs all proposals that impact CLECs, including those initiated by Qwest, on at least a quarterly basis. In particular, more information is needed a timely basis about Qwest-initiated changes. Although Qwest's Proposal indicates that it will share these proposals "at a high-level," Eschelon believes that Qwest needs to provide sufficient detail to allow CLECs to evaluate and anticipate such proposed changes and to do so with adequate notice.

Qwest's Proposal also states that Qwest-initiated changes will be prioritized in a collaborative process. In the past, the CLECs have been asked to vote on CLEC-initiated

changes after Qwest has decided upon which of its own changes will be made and then independently set the number and size of CLEC-initiated changes that will be allowed. Therefore, although the CLECs may agree that five of fifteen issues are all top priority, Qwest may allow CLECs to select three of those five, because Qwest has already selected a number of its own changes. CLECs know little about the criteria that Qwest has used to do so. CLECs need a better understanding of the factors affecting Qwest's decisions in this regard. More information, along with an opportunity to prioritize both Qwest- and CLEC-initiated changes, will clarify this process and help ensure true, nondiscriminatory industry prioritization.

Another aspect of prioritization that should be included in the restructure is the issue of notice. Qwest needs to provide clear, advance notice of the specific issues on which carriers will be asked to vote and when the vote will occur. Intervals should be established for both CLEC- and Qwest-initiated changes for the presentation, review, evaluation, and resolution of such changes.

Generally, more notice is needed of CICMP issues. For example, the final distribution packages for the meetings often are not distributed until the evening before or day of the CICMP meetings. Qwest at times adds items to the agenda without providing adequate notice to allow interested CLECs, or the appropriate subject matter personnel from a participating CLEC, to participate. Qwest has also organized separate calls, either with specific CLECs or a group of CLECs, to address issues in more depth that were raised during CICMP. Often, such calls are poorly noticed, no agenda or list of Qwest attendees is provided in advance of the call, and no written summary or list of action items is provided after the call. Timely and effective notice is needed for issues affecting conduct of the meetings and calls, as well as substantive changes to systems and processes.

Notices will not be effective if they are not received by the proper parties. The current notice system is becoming unmanageable because of the number of notices of a wide-ranging nature that go to a general distribution list. Eschelon has asked that Qwest implement a process, which Qwest had previously announced but not implemented, of grouping notices by subject matter to allow CLECs an opportunity to designate personnel who should receive relevant notices. More work is needed in this area to ensure that effective notice is provided in a meaningful manner. Without a more manageable notice process, smaller CLECs will be unable to participate in the process, and all parties will experience inefficiencies as CLECs ask about issues that have been covered by a notice but that notice was not received by the proper party. Qwest's Proposal does not address these kinds of notice issues.

A significant change that is needed in CICMP, but not addressed in Qwest's Proposal, is the identification and accountability of executives within Qwest with ownership for following through with issues. The CICMP Managers may coordinate issues, but they cannot commit to make changes or allocate the resources to do so. Qwest should designate an executive with ownership for ensuring completion of committed activities, identify that individual, and ensure that the individual is accountable for results. It may be unclear who is responsible for an issue, the responsible person may not have either the appropriate knowledge or authority level to follow through with an issue, or the

## **Exhibit E**

designated person changes and the change causes delay. Ownership and commitment is needed to ensure timeliness and responsiveness.

Qwest's high level Proposal is subject to interpretation and leaves many questions unanswered. A more concrete description of the process is needed.

## Exhibit E

-----Original Message-----

From: Powers, F. Lynne [mailto:flpowers@eschelon.com]  
Sent: Wednesday, September 26, 2001 2:47 PM  
To: 'Schultz, Judith'  
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Rossi'; 'marcia.lees@sbc.com'  
Subject: Collaborative Process

Judy,

I would like to make you aware of four instances in the last month in CMP (Actual or Redesign) where the CLEC's have expressed their combined desire for an option or a direction regarding a matter in the meeting and later Qwest has ignored the CLEC's wishes and unilaterally taken action differently than agreed. If Qwest is choosing to disagree with the CLEC's and dictate the change then I would like to request that you at least state that. The four instances are as follows:

1) Loss & Completion Reports - In a conference call held on Friday, September 14th, to discuss CR# 5522887 the CLEC's voted and formally requested that Qwest put this issue on the CMP-Systems agenda and have a technical representative available to discuss it fully vs. having another off-line call. This meeting was hosted by Mark Routh who actually conducted a roll of participating CLEC's and recorded the vote. It is not acceptable for you to state that you were personally not aware of this when Qwest hosted the call. This instance in itself speaks to the problem of having all these separate off-line calls where no meeting notes are recorded. By simply ignoring CLEC's wishes stating that you did not think we would have time in the meeting (a meeting that ended an hour and half early), you are making a mockery of the CLEC wishes. In this case if Qwest disagreed with the CLEC's they should have stated that clearly and an impasse could have been dealt with prior to the meeting.

## Exhibit E

2) October 2001 Redesign Meeting Location - We voted on the meeting location for October meetings in August. It was discussed that Qwest representatives would travel to Minneapolis as well. CLEC's made plans to attend and purchased airline tickets. On Monday, September 24th, a week before the first October meeting, Qwest sent an e-mail stating that "Due to recent events, the Qwest team will not travel to Minneapolis for the upcoming CMP Re-design session." Assuming that the recent events are the national tragedies that occurred on Sept. 11th and Qwest feels it is "too risky" to travel, the logic seems to assume that it is ok for the CLEC's to travel but not Qwest. Once again a vote was taken in August 2001, a national event occurred and it may have been appropriate for a new vote to be taken but instead Qwest unilaterally decided not to travel and now we will have half the CLEC's in Minneapolis and half in Denver.

3) Day Long CMP Meetings - On September 19, 2001 at the CMP meetings we discussed the difficulty of having all of these "off-line" meetings vs. conducting substantive discussions at the regularly scheduled meetings. Eschelon stated it's wish to have a day long systems meeting and a day long process meeting. Other CLEC's agreed, you asked and there were no dissenting votes. We all left that meeting with the understanding that was the agreement. I was told that on Thursday, Sept. 20th in the re-design meeting that Qwest did not feel that was a decision was final and it would be conducting a formal vote through e-mail. Once again, Qwest unilaterally decided to this and did not state it's position openly at the time.

4) PCAT meetings - On September 19, 2001 at the CMP meeting we discussed the difficulty the CLEC's are having with adequate notification and meaningful review of the revised PCATs. CLEC's stated their desire to temporarily stop the current PCAT change process until the process was improved to reflect CLEC comments. On September 24th Qwest stated that they will hold a meeting on October 5th to discuss but that the conference calls and current process would continue. Once again, Qwest agreed to something in the meeting and subsequently changed their mind afterward.

In the future, I would hope that this will not happen again and that if Qwest does not agree with the CLEC's it will clearly state that and we

## Exhibit E

will all know that we have an impasse issue to deal with rather than leading the CLEC's to believe that we have an agreed upon action plan only to find out later that Qwest has taken the liberty of changing its position.

Lynne Powers  
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## CERTIFICATE OF SERVICE

I certify that the original and 10 copies of AT&T's Comments on Qwest's Status Report Regarding the Change Management Process Redesign in Docket No. T-00000A-97-0238 were sent by overnight delivery on October 29, 2001 to:

Arizona Corporation Commission  
Docket Control – Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007

and a true and correct copy was sent by overnight delivery on October 29, 2001 to:

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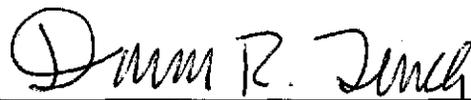
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