

# OPEN MEETING ITEM



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**COMMISSIONERS**  
JEFF HATCH-MILLER - Chairman  
WILLIAM A. MUNDELL  
MARC SPITZER  
MIKE GLEASON  
KRISTIN K. MAYES



## ARIZONA CORPORATION COMMISSION

DATE: October 3, 2005  
DOCKET NO: T-01051B-03-0859  
TO ALL PARTIES:

Enclosed please find the recommendation of Administrative Law Judge Jane Rodda. The recommendation has been filed in the form of an Order on:

### QWEST CORPORATION (PERFORMANCE ASSURANCE PLAN)

Pursuant to A.A.C. R14-3-110(B), you may file exceptions to the recommendation of the Administrative Law Judge by filing an original and thirteen (13) copies of the exceptions with the Commission's Docket Control at the address listed below by **4:00 p.m.** on or before:

OCTOBER 12, 2005

The enclosed is NOT an order of the Commission, but a recommendation of the Administrative Law Judge to the Commissioners. Consideration of this matter has tentatively been scheduled for the Commission's Open Meeting to be held on:

OCTOBER 18 AND 19, 2005

For more information, you may contact Docket Control at (602)542-3477 or the Hearing Division at (602)542-4250. For more information about the Open Meeting, contact the Executive Director's Office at (602) 542-3931.

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BRIAN C. McNEIL  
EXECUTIVE DIRECTOR

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 COMMISSIONERS

3 JEFF HATCH-MILLER, Chairman  
4 WILLIAM A. MUNDELL  
5 MARC SPITZER  
6 MIKE GLEASON  
7 KRISTIN K. MAYES

8 IN THE MATTER OF QWEST CORPORATION'S  
9 PERFORMANCE ASSURANCE PLAN.

DOCKET NO. T-01051B-03-0859

DECISION NO. \_\_\_\_\_

ORDER

10 Open Meeting  
11 October 18 & 19, 2005  
12 Phoenix, Arizona

13 **BY THE COMMISSION:**

14 \* \* \* \* \*

15 Having considered the entire record herein and being fully advised in the premises, the  
16 Arizona Corporation Commission ("Commission") finds, concludes, and orders that:

FINDINGS OF FACT

17 1. On June 5, 2002, in Decision No. 64888, as part of the Section 271 approval process,  
18 the Commission approved Qwest's Corporation's ("Qwest") Performance Assurance Plan ("QPAP").

19 2. The QPAP is Exhibit K to Qwest's Statement of Generally Available Terms and  
20 Conditions ("SGAT"). The QPAP employs Performance Indicator Definitions (PIDs) to measure  
21 Qwest's performance in providing service to its wholesale customers. The PIDs are set forth in  
22 Exhibit B to Qwest's SGAT.

23 3. The QPAP is intended to provide an incentive for Qwest to continue to provide  
24 adequate service to wholesale customers following its Section 271 approval. The Plan provides  
25 individual CLECs with TIER 1 payments if Qwest does not provide parity between the service it  
26 provides to CLECs and that which it provides to its retail customers or if Qwest fails to meet certain  
27 benchmarks. As added incentive, the QPAP provides for Qwest to make TIER 2 payments to the  
28 Commission if Qwest fails to meet parity and benchmark standards on an aggregate CLEC basis.

1           4.     The QPAP became effective when Qwest received Section 271 authorization from the  
2 Federal Communications Commission ("FCC") on December 15, 2003.

3           5.     Section 16.0 of the QPAP provides:

4                 Every six (6) months, Qwest, CLECs, and the Commission shall review  
5 the performance measurements to determine whether measurements  
6 should be added, deleted, or modified; whether the applicable benchmark  
7 standards should be modified or replaced by parity standards; and whether  
8 to move a classification of a measure to High, Medium, or Low or Tier-1  
9 to Tier-2. The criterion for reclassification of a measure shall be whether  
10 the actual volume of data points was less or greater than anticipated.  
11 Criteria for review of performance measurements, other than for possible  
12 reclassification, shall be whether there exists an omission or failure to  
13 capture intended performance, and whether there is duplication of another  
14 measurement. The first six-month period will begin upon the FCC's  
15 approval of Qwest's 271 for the state of Arizona. Any changes to existing  
16 performance measures and this remedy plan shall be by mutual agreement  
17 of the parties. Qwest acknowledges that the Commission reserves the  
18 right to modify the PAP at any time it deems necessary upon Commission  
19 Order after notice and hearing.

20           6.     A Procedural Order dated June 18, 2004, established a process for garnering the  
21 comments of interested parties on the scope of the QPAP's first six-month review proceeding and  
22 other related issues.

23           7.     Pursuant to the June 18, 2004 Procedural Order, Qwest, MCImetro Access  
24 Transmission Services LLC ("MCI") and Eschelon Telecom, Inc. ("Eschelon") filed comments.

25           8.     On July 30, 2004, the Commission's Utility Division Staff ("Staff") filed a Response  
26 to the Parties' Comments Regarding the Scope of the 6-Month Review, and noted that there was  
27 disagreement amongst the parties concerning the scope of the review.

28           9.     On August 6, 2004, Staff filed a Supplement to its July 30, 2004 filing, providing  
further description and analysis of the parties' positions and setting forth a list of unresolved issues  
for discussion.

          10.    Pursuant to a Procedural Order dated August 5, 2004, the Commission convened a  
Procedural Conference on August 24, 2004, to discuss how to proceed in the six-month review.  
Staff, Qwest, MCI, Eschelon and DIECA Communications Company dba Covad Communications  
("Covad") participated in the Procedural Conference. Prior to the Procedural Conference, Qwest

1 circulated a matrix of the issues. At the time of the August 24, 2004 Procedural Conference, Qwest  
2 and the CLECs were engaged in, or had recently concluded, a six-month Plan review in Washington  
3 State. Believing that the Washington proceeding had narrowed the issues, the parties recommended  
4 that they try to resolve consensually the disputed issues that had been identified in Qwest's matrix for  
5 Arizona.

6 11. On November 1, 2004, MCI, Eschelon, AT&T, Covad, Staff and Qwest filed a  
7 Stipulation which indicated that they had resolved all but one of the outstanding issues that had been  
8 raised in the course of the six month review. The parties were able to agree on the resolution of the  
9 disputes concerning specific PIDs. The parties could not agree on a process for how PID  
10 modifications should be made outside of the six-month review process, referred to as the Long Term  
11 PID Administration ("LTPA") process.

12 12. During a November 3, 2004 Procedural Conference, the participating parties agreed  
13 that the Commission could proceed with its consideration of whether to approve the stipulated  
14 resolution of the issues affecting the QPAP and the PIDs independently of resolving the dispute  
15 concerning the LTPA process.

16 13. In Decision No. 67575 (February 15, 2005) the Commission approved the revisions to  
17 the PIDs and QPAP as proposed by the parties in the Stipulation.

18 14. By Procedural Order dated December 16, 2004, the Commission established a  
19 procedure for resolving the dispute concerning LTPA. Pursuant to the December 16, 2004 Procedural  
20 Order, on January 21, 2005, Qwest filed the testimony of Dean Buhler, Qwest's Staff Director in the  
21 Regulatory Compliance Group of the Risk Management Department. Covad filed the testimony of  
22 Elizabeth Balvin, its Director of External Affairs, on March 4, 2005.

23 15. In a Procedural Conference on April 7, 2005, Qwest, Covad and Staff agreed to  
24 resolve the dispute based on the pre-filed testimony and briefs and waived their right to a hearing.

25 16. Pursuant to a Procedural Order dated April 8, 2005, Qwest and Staff filed Opening  
26 Briefs on April 28, 2005. Covad did not file a Opening Brief. On May 13, 2005, Qwest and Covad  
27 filed Responsive Briefs.

28 17. On December 10, 2004, MCI, Eschelon, AT&T and Covad collectively filed

1 comments on Qwest's PID Management Process.

2 18. During the Section 271 process, Qwest, CLECs and Staff utilized a "technical  
3 Advisory Group" ("TAG")<sup>1</sup> to oversee the Arizona OSS test and to deal with test and PID issues.  
4 Buhler testimony at 7. In this process Qwest and the CLECs advocated their respective positions and  
5 negotiated to find compromises where possible. Periodically, state staffs or commissions resolved  
6 impasse issues. *Id.* Following Section 271 approval in all of Qwest's 14 states, the parties formed  
7 the LTPA to address PID changes subsequent to Section 271 approval. The LTPA adopted the  
8 communal approach that had been utilized during the Section 271 approval process. *Id.*

9 19. Qwest believed that the LTPD process had evolved from a politically sensitive  
10 environment and did not foster a focus on legitimate business needs or problems in a neutral  
11 environment. Qwest believed the LTPA process was inefficient as it: 1) lacked criteria for  
12 determining what issues could be raised or scrutinizing meritorious from frivolous issues; 2) reflected  
13 an assumption that Qwest carry the burden of refuting challenges to its performance or processes and  
14 the exchange of information was usually only one way with CLECs requesting data from Qwest but  
15 failing to provide their own facts; 3) lacked guiding principles and structure that resulted in an  
16 inefficient use of resources; and 4) was adversarial and politicized rather than promoting articulated  
17 business needs and the building of constructive relationships. Buhler testimony at 8-9.

18 20. Participation in the LTPA was optional. Buhler testimony at 10. CLECs December  
19 10, 2004 Comments at 2.

20 21. Qwest states that only five CLECs operating in its 14 state region consistently  
21 participated in the LTPA. Buhler testimony at 10.

22 22. Qwest decided not to participate in the LTPA process and instead implemented a PID  
23 Management Process. Qwest posted the PID Management Process on its publicly available  
24 wholesale website<sup>2</sup> on August 6, 2004. Buhler testimony at 11.

25 \_\_\_\_\_  
26 <sup>1</sup> The Test Advisory Group consisted of the Commission, its consultant, DCI, the pseudo CLEC, Hewlett Packard, Qwest  
27 and CLECs which desired to participate. Its purpose was to act as a communications mechanism to advise all parties of  
test results, exceptions and corrective action and to provide CLEC feedback on the OSS Test.

28 <sup>2</sup> <http://www.qwest.com/wholesale/clecs/regmodpid.gtml>.

1           23.     According to Qwest, CLECs may invoke the PID Management Process by contacting  
2 Qwest's Service Management Organization. Buhler testimony at 12. Notice of the discussions  
3 between Qwest and the CLEC are provided to all CLECs operating in Qwest's 14-state local service  
4 region, whether or not the issue was raised by one CLEC or a group of CLECs. *Id.* Under its  
5 process, Qwest reports that it will post both agreements and disagreement on its website so that  
6 interested entities, whether CLECs or state commissions, can be informed of the nature of the issues  
7 and their disposition. *Id.* at 13. Qwest states that its process requires that agreements reached by the  
8 parties be filed with the state commissions for approval. *Id.* Any party can take a disputed issue to a  
9 state commission, which Qwest states retains its authority as final arbiter. *Id.*

10           24.     Qwest believes that the one-on-one discussions between the CLEC and Qwest are  
11 more focused on business needs and the parties are more forthright and less guarded than when a  
12 regulator participates. Buhler testimony at 14. Qwest believes that when commission staffs attend  
13 negotiations, they obtain information on offers to compromise which has the effect of cooling party  
14 discussions by creating concern the knowledge may influence state staffs when resolving disputes.  
15 Buhler testimony at 14-15. In response to CLEC criticism that the PID Management Process does  
16 not contain timeframes to complete tasks, Qwest states that it is not opposed to adding timeframes.  
17 Qwest notes that the LTPA did not contain timeframes either. Buhler testimony at 15.

18           25.     In the December 10, 2004, Comments, the CLECs criticized Qwest's unilaterally  
19 proposed PID Management Process because it was developed without any input from the LTPA  
20 group, state staffs or the CLEC community. They note that when Qwest was seeking Section 271  
21 approval it had an incentive to work collaboratively, but once it obtained approval, it did not work  
22 with any of the groups to obtain approval of the changes to the process. Because there has been no  
23 collaboration, the CLECs are concerned there is little clarification about how the alternative process  
24 will work. The CLECs state that if Qwest were to take a cooperative approach to revising the LTPA  
25 process, it may be able to reach consensus on the issues that concern it. The CLECs argue that  
26 Qwest's proposed process suffers because there is no Commission oversight, as they believe  
27 commission staff input facilitates the ability of all industry stakeholders, particularly smaller CLECs  
28 in more rural states, to have a say in the process. Staff's representation of the public interest would

1 protect the aggregate CLEC community. Under Qwest's proposal, the CLECs fear that they may be  
2 forced to litigate more PID disputes at the Commission, rather than reaching agreement in a  
3 collaborative process.

4 26. Covad testified that Qwest's PID Management Process fosters Qwest's complete  
5 control of negotiations. Covad believes the benefit of the LTPA process was that no one party was  
6 able to solely provide the input regarding what changes were needed. Balvin testimony at 2. Covad  
7 also incorporated the December 10, 2004 CLEC comments into its testimony.

8 27. Staff believes that the collaborative nature of the LTPA process ensured a democratic  
9 process under which both Qwest and CLECs had the benefit of established ground rules to ensure fair  
10 and maximum process. Staff further believes the LTPA process is critical to ensure that any  
11 measurement problems are detected early and rectified. Staff disagrees with Qwest that the LTPA  
12 process is outdated or "politically sensitive". Staff believes the process was open and collaborative  
13 which lent credibility to the ultimate decisions. According to Staff, one of the primary advantages of  
14 the LTPA process is that it allows a complete airing of the issues by all affected parties before those  
15 issues reach the Commission for acceptance. Staff believes this part of the LTPA process would be  
16 difficult to replicate in the course of the six month review before the Commission.

17 28. Staff believes that given the strict governance rules of both the TAG and the LTPA,  
18 and the importance of this process to post Section 271 compliance assurance, that Qwest is not  
19 entitled to unilaterally implement a fundamental change in the process without CLEC or Commission  
20 agreement. To the extent Qwest has identified problems with the LTPA process, Staff believes those  
21 issues should have been resolved by all parties, rather than by Qwest's unilateral withdrawal of the  
22 LTPA process.

23 29. Staff has several concerns about Qwest's PID management Process including: 1) little  
24 structure as there are no ground rules or governance rules; 2) no timelines for the process; 3) the  
25 process is not transparent which does not lend credibility to the results; and 4) the process puts too  
26 much control in the hands of Qwest.

27 30. Staff recommends that the Commission should require Qwest to develop, through a  
28 collaborative process, changes to the ground rules for LTPA II.

1           31.     Staff believes that for the Commission to continue to be able to effectively monitor  
2 Qwest's performance for backsliding purposes, the Commission needs to be assured that the PIDs are  
3 being developed and fine tuned in a collaborative, open process. Staff recommends that the  
4 Commission should require CLEC input into any new process for LTPA II. Staff further  
5 recommends that if Qwest is unwilling to do this, the Commission should reconsider whether to  
6 utilize the Arizona TAG to review any changes to the PAP or PIDs on an ongoing basis.

7           32.     Qwest argues that Staff's recommendation that would require Qwest to participate in  
8 the LTPA II and to reach agreement with the CLECs is inconsistent with the acknowledged voluntary  
9 nature of the LTPA process. Further, Qwest asserts that Staff's recommendations to reconstitute the  
10 TAG if Qwest is unwilling or unable to reach agreement on a LTPA II process is impractical as the  
11 TAG was a specific process that related only to the OSS Test. Qwest also believed Staff's  
12 recommendation to have the Commission resolve disputes regarding the LTPA's governing  
13 principles is inconsistent with the regional nature of the LTPA.

14           33.     Qwest also argues that Staff's concerns with Qwest's PID Management Process are  
15 baseless. Qwest asserts the PID Management Process is more structure in many ways than the  
16 LTPA. Qwest also argues that the flexibility of its process is one of its benefits and that the LTPA  
17 process did not guarantee a quick resolution. Qwest states that under its process, time sensitive issues  
18 can be raised at any time, which it argues is an improvement over the LTPA, where issues were  
19 raised and discussed according to a fixed schedule within six month intervals. Qwest has offered to  
20 add timeframes to the various process tasks, and believes that it would be better to assign such  
21 timeframes after gaining experience with the process. In response to the criticism, that the process is  
22 not transparent, Qwest argues it is publicly available for any entity to access, and that once  
23 agreements are reached, or issues remain in dispute, those agreements and disputes are placed on  
24 Qwest's website. Whether agreement is reached or disputes remain, Qwest states, the Commission  
25 retains its authority to approve the parties' agreements or decide disputed issues. Qwest asserts that  
26 any issue the CLECs raise will be defined, researched, discussed and documented. Qwest argues  
27 there is no more credible situation than carriers negotiating, coming to an agreement and filing that  
28 agreement with the Commission for approval. Finally, Qwest disputes that it would have too much

1 control over the process. Qwest states that a region-wide notice is sent to all certified CLECs and  
2 that according to the process, all CLECs can participate should they wish to take a position in  
3 alignment with, or in opposition to Qwest's.

4 34. A copy of the page from Qwest's web site setting forth the process for modifying PIDs  
5 is attached hereto as Exhibit A. It is not clear from the testimony in this proceeding whether any of  
6 the CLECs have tried to effect a PID modification under Qwest's proposal. A recent visit to Qwest's  
7 web site showed that there were no PID Agreement Updates or PID Dispute Updates.

8 35. The primary CLEC criticism of the process was Qwest's unilaterally proposing a  
9 process to replace the LTPA, the amount of Qwest control over the process and the lack of Staff  
10 participation. CLECs appear to believe that Staff is able to represent the interest of smaller CLECs.  
11 In addition to criticizing Qwest's attempt to dictate the process, Staff's concerns focus on the  
12 transparency and openness of the process. The transparency and openness of the Qwest proposed  
13 process has yet to be tested. On paper, Qwest's PID Management Process allows, and appears to  
14 encourage, CLECs to file joint modification requests, or to join in a modification request brought by  
15 another CLEC. Thus, in theory, Qwest's process would allow for all interested CLECs to obtain  
16 information on pending PID modification requests with an opportunity for any CLEC to participate.

17 36. The evidence presented shows that CLEC and Staff participation in the LTPA was  
18 limited. The parties were able to negotiation PID modification in connection with the first six month  
19 review without the LTPA process.

20 37. We understand Qwest's concerns concerning Staff participation in discussion on PID  
21 modifications, with access to information on offers to compromise, and then playing a role in dispute  
22 resolution. We believe however, that because Staff represents the public interest, an interest broader  
23 than either Qwest's or the CLECs', that Staff can play an important and unique role in the  
24 modification process, and that Qwest's concerns are outweighed by the benefits of Staff involvement.  
25 Disputed issues can be taken, as they have been in the past, to the Commission through the hearing  
26 process, with Staff acting as a party.

27 38. Adding timeframes to the process, as well as allowing for a means for CLECs to  
28 involve commission staffs, and/or a means to monitor the status of a modification prequest prior to its

1 published resolution, may alleviate some concerns about Qwest control over the process. The six  
2 month review adds another level of protection to CLECs that Qwest will not be able to ignore CLEC  
3 concerns about the QPAP and PIDs. If CLECs do not believe Qwest's process is fair, they will not  
4 utilize it, but rather will use the 6 month PAP review process to address their concerns. If Qwest  
5 believes its process is superior to that utilized in the LTPA, it should want to encourage CLECs to use  
6 it and thus have incentive to make modifications as suggested by the CLECs.

7 39. We find that Qwest, interested CLECs and Staff should engage in discussions to  
8 determine if Qwest's proposed PID Management Process can be improved through the addition of  
9 timeframes, a means for Staff participation, or any other modifications that promotes transparency.  
10 We can better evaluate the effectiveness of Qwest's process after the parties have had some  
11 experience with it. If, however, discussions are not fruitful and CLECs and Staff continue to believe  
12 that Qwest's process is unfair, inaccessible or ineffectual, they should propose an alternative  
13 procedure for use during the next six month review.

14 **CONCLUSIONS OF LAW**

15 1. Qwest is a public service corporation within the meaning of Article XV of the Arizona  
16 Constitution and A.R.S. Sections 40-281 and 40-282 and the Commission has jurisdiction over  
17 Qwest.

18 2. The Commission has jurisdiction over Qwest, the QPAP and the issues raised in this  
19 proceeding concerning Qwest's PAP and PID administration.

20 3. Notice of the proceeding was provided in accordance with law.

21 4. The findings set forth in Findings of Fact Nos. 37, 38 and 39 are fair, reasonable and  
22 in the public interest and should be adopted.

23 ...  
24 ...  
25 ...  
26 ...  
27 ...  
28 ...

**ORDER**

IT IS THEREFORE ORDERED that Qwest Corporation, Staff and interested CLECs shall comply with the discussion in Findings of Fact Nos. 37, 38 and 39.

IT IS FURTHER ORDERED that this Decision shall become effective immediately.

BY ORDER OF THE ARIZONA CORPORATION COMMISSION.

CHAIRMAN

COMMISSIONER

COMMISSIONER

COMMISSIONER

COMMISSIONER

IN WITNESS WHEREOF, I, BRIAN C. McNEIL, Executive Director of the Arizona Corporation Commission, have hereunto set my hand and caused the official seal of the Commission to be affixed at the Capitol, in the City of Phoenix, this \_\_\_\_ day of \_\_\_\_\_, 2005.

BRIAN C. McNEIL  
EXECUTIVE DIRECTOR

DISSENT \_\_\_\_\_

DISSENT \_\_\_\_\_

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2 DOCKET NO.:

T-01051B-03-0859

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## Wholesale

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### Qwest Wholesale Performance Information

#### PID - Request to Modify Process

##### Description

If you would like to submit a request to add a new Performance Indicator Definition (PID), or to modify or delete an existing PID, Qwest has in place the Request to Modify a PID process to assist you.

The purpose of PIDs is to provide an objective method to judge Qwest's ability to provide wholesale services. The goal is to provide services to you in a manner that is either substantially the same as the level of service offered by Qwest's retail operations, or that provides you with a meaningful opportunity to compete. The PIDs were established in order to support Qwest's Section 271 applications and approval processes, and the Performance Assurance Plan (PAP) development process.

You may submit modifications to the current version of the PIDs contained in Qwest's Statements of Generally Available Terms and Conditions (SGATs).

You as an individual CLEC, or a group of CLECs, may request a modification. The process operates similarly whether the request is made by one or multiple CLECs. In fact, we encourage the CLEC community to address performance measurement issues together and then submit the request as a group. This could result in a more efficient discussion with Qwest and help promote the uniformity of performance measurements.

##### Request to Modify a PID Process

If you wish to submit a Request to Modify a PID, it is necessary to first contact your Qwest Service Manager. If the request were to be made by multiple parties, the Service Manager for the designated lead CLEC would be the point of contact.

When you contact the Service Manager, he or she will work with you to identify the appropriate process to respond to your needs. When the Request to Modify a PID process appears to be the most appropriate process, the Service Manager will supply you with the form to request a PID modification.

When you complete the form and return it, Qwest will review it for

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completeness, ensuring that the required information has been provided. Instructions for requirements are included on the form. If the form is incomplete, either your Service Manager or another Qwest resource will contact you with help on how to properly revise and resubmit the request.

When the form is complete, Qwest will contact you to schedule one or more meetings to discuss your request, based on the number and nature of the modifications requested and whether similar requests have been received from others. Qwest will come to the meeting(s) prepared to discuss your request.

After the completed request is submitted, Qwest will send out a notification with meeting details to all CLECs that have Interconnection Agreements with Qwest, so that there will be discussion about the requested change from the CLEC community.

Once the parties have reached a collective agreement on any modifications to PIDs, Qwest will post the agreement(s) within the PID - Request to Modify section on the Qwest Wholesale Performance Information Web site. Qwest will also make Exhibit B and/or Exhibit K filings with the State Commissions, as appropriate. Any party can take a desired PID change that remains unresolved to a State Commission for consideration through the six-month review process. Any disputed issues that are not considered PID related by both parties may be brought to the State Commission outside of the six-month review process set forth in the PAPA. Unresolved issues will also be posted within the PID - Request to Modify section on the Qwest Wholesale Performance Information Web site.

#### **Request to Modify a PID Process Flow Diagram**

The flow diagram for this process can be accessed from the following hyperlink:

[PID - Request to Modify Process Flow Diagram](#)

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#### **Frequently Asked Questions (FAQs)**

##### **1. Will discussions on modifications to PIDs address Performance Assurance Plans (PAP) issues?**

Yes. How the PAP(s) treat particular PIDs may be discussed, if appropriate. For example, the tier designation for a substantially revised PID could be discussed.

##### **2. Does the process described in this document replace the Long Term PID Administration (LTPA)?**

Yes, it does.

##### **3. Does this process address the day-to-day inquiries about PIDs and a CLECs ad hoc data?**

No. Day-to-day inquiries regarding PIDs and ad hoc data will continue to be handled through existing processes by Qwest's Service Management organization.

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