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BEFORE THE ARIZONA CORPORATION COMMISSION

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Commissioner

IN THE MATTER OF THE COMPLAINT OF ESCHELON TELECOM OF ARIZONA, INC. AGAINST QWEST CORPORATION	DOCKET NO. T-03406A-06-0257 T-01051B-06-0257 NOTICE OF FILING DIRECT TESTIMONY OF JILL MARTAIN, RENEE ALBERSHEIM, JEAN L. NOVAK AND TERESA K. MILLION

Please take notice that Qwest Corporation hereby files the Direct Testimony of Jill Martain, Renee Albersheim, Jean L. Novak and Teresa K. Million, copies of which are attached, with associated exhibits.

The confidential version of Exhibits 3 & 4 of the Martain Affidavit, Exhibits 4-20 of the Novak Affidavit, and Exhibit 1 to the Teresa K. Million Affidavit are being transmitted to the Administrative Law Judge and to the Parties who have executed the Protective Agreement.

Arizona Corporation Commission
DOCKETED

AUG 28 2006

DOCKETED BY nr

RESPECTFULLY SUBMITTED this 28th day of August, 2006.

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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF THE COMPLAINT OF ESCHELON TELECOM OF ARIZONA, INC. AGAINST QWEST CORPORATION	DOCKET NO. T-03406A-06-0257 DOCKET NO. T-01051B-06-0257

DIRECT TESTIMONY

OF

JILL MARTAIN

ON BEHALF OF

QWEST CORPORATION

AUGUST 28, 2006

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I. INTRODUCTION

Q. PLEASE STATE FOR THE COMMISSION YOUR CURRENT EMPLOYMENT.

A. I am currently employed by Qwest Corporation as a Manager for Process Management.

Q. HOW LONG HAVE YOU WORKED IN THE TELECOM FIELD?

A. I have been in the telecommunications industry for 28 years. My experience in the telecommunications industry started as a Service Representative, supporting Retail Residential, Business and Selected Complex Business customers, taking orders for their service requests and resolving billing and other related customer issues. I have experience working in the Network organization inputting service orders into the TIRKS (Trunk Integrated Record Keeping System) database and validating those orders for accuracy. I designed basic Private Line services within the TIRKS database (such as basic analog, digital and DS1 services) providing our central offices and network technicians a circuit detail record (or schematic) of the service that is to be installed. I later moved into the Wholesale division and gained experience in the billing, provisioning and process aspects of the business.

Q. WHAT IS YOUR EXPERIENCE IN WHOLESALE SERVICES?

A. I have been working in the Wholesale division for 16 years. I served as a Service Delivery Coordinator (SDCs) doing bill validation of switched access services and later became the coach of a billing team that was responsible for the billing and collections for some of our key customers. I also coached SDCs that write the service orders from the ASR requests that are received from our Wholesale customers. I have developed processes and determined system requirements for many of the products and services that are offered to our customers. I documented both internally and externally the intricacies of those processes. I

negotiated these both internally with Qwest personnel, as well as externally with our CLECs through the Change Management Process (CMP).

Q. HOW LONG HAVE YOU BEEN INVOLVED IN QWEST'S CHANGE MANAGEMENT PROCESS?

A. I have been involved with the Change Management Process since 2002 and managed the Change Management Process from July 2004 through June 2006, working with the CLEC community to develop and implement both Product/Process and System related customer facing issues.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. My testimony provides a detailed explanation of the Change Management Process and explains the genesis of the Order Expedite Process that is central to Eschelon's complaint. I also demonstrate that Qwest's wholesale and retail expedite processes are non-discriminatory.

Q. WILL YOU PLEASE SUMMARIZE YOUR TESTIMONY?

A. The Change Management Process (CMP) is a process that was designed by the industry as a whole. It was agreed to and approved by the FCC and the Commission. Qwest continues to provide quarterly updates to the Commission regarding the CMP.

Eschelon is a very active participant in CMP. They have attended 100% of the monthly meetings since April 2001, with more than one Eschelon representative attending the vast majority of the time. Eschelon is a member of the CMP Oversight Committee and understands the CMP very well.

All CLEC facing processes are created, modified/changed or discontinued through the CMP process. Expedites are no exception. The expedite process was changed through a combination of Change Requests (CRs) submitted by Covad and AT&T as well as Level 3 notifications associated with Qwest initiated

changes. Level 3 process notifications are not new to the CLECs. It is a standard process that is utilized to notify the CLECs about Qwest initiated process changes Notification timelines were established with the industry (minimum 31-days) that determined when Level 3 process changes could be implemented. Qwest followed those guidelines for the portion of the expedite process created in CMP that is being discussed here. However, instead of just providing the CLEC community 31-days advanced notice, Qwest provided 2 ½ months notice before the change went into effect. Eschelon was fully aware of the changes that were forthcoming; in fact, Eschelon even requested an ad-hoc call so the issue could be specifically discussed and further clarified. Eschelon did not take any formal escalation or dispute resolution to the process change that took effect on January 3, 2006 until the filing of this Complaint.

II. PURPOSE OF CHANGE MANAGEMENT

Q. WHAT IS THE ORIGIN OF THECHANGE MANAGEMENT PROCESS?

A. The CMP was approved as part of the Section 271 proceedings by both this Commission and the FCC.

Q. WHAT IS THE PURPOSE OF THE CMP?

A. From a CLEC's perspective, the purpose of the CMP is to provide CLECs with a meaningful opportunity to modify systems, processes and procedures. From Qwest's perspective, CMP is to ensure that Qwest can implement uniform systems, processes and procedures so it can train its employees and perform at a consistently high level of quality for its wholesale customers.

Q. HAS THE FCC APPROVED THE TERMS OF THE CMP?

A. Yes. The FCC painstakingly evaluated CMP as part of 271. The FCC found CMP to be "clearly drafted, well organized and accessible," *for example in the Section 271 proceeding regarding Colorado: In the Matter of Application by Qwest Communications International, Inc. for Authorization to Provide In-Region,*

InterLATA Services in the States of Colorado et al., FCC 02-332 (Rel. Dec. 23, 2002) at ¶133. The FCC asserted that CMP "effectively processes and communicates to competitive LECs 'any changes in Qwest's OSS interfaces and to products and processes that are within the scope of CMP." *Id.* Importantly, the FCC recognized that "a key component of an effective change management process is the existence of a forum in which both competing carriers and the BOC to improve . . . method[s]." *Id.* at ¶134. The FCC found CMP did just that. *Id.*

Q. DID THE ARIZONA COMMISSION DECIDE TO CONTINUE TO REVIEW THE CHANGE MANAGEMENT PROCESS?

A. Yes. Qwest makes quarterly filings with the Commission. These filings report the status of the changes that occur quarter over quarter, along with a document describing Qwest's compliance with the process. These filings are attached as ***Exhibit JM-1***.

Q. DO CLECS ACTUALLY USE CMP?

A. Yes, for years now, Qwest and the CLECs in its region have used CMP to modify systems, and to improve processes and procedures. Many CLECs are engaged in the monthly meetings, which discuss the new and pending change requests. Qwest actively receives input and comments from CLECs through the CMP mailboxes and CLECs routinely participate in the IMA (Interconnect Mediated Access) prioritization process. Also, a large number of CLECs participate in the CMP process simply by receiving and responding to the notices that are distributed through CMP (the notices go to 829 different individuals associated with 393 companies).

Q. HAS ESCHELON PARTICIPATED IN THE CMP?

A. Yes, Eschelon has been very active in the CMP, submitting 228 change requests of which 188 have been accepted. Comparatively overall, approximately 19% of

the CRs accepted through the CMP have come from Eschelon. Since April 2001, Eschelon has attended 100% of the 195 Monthly CMP meetings, which includes both the product/process and system meetings. With the exception of one product/process meeting, Eschelon has had more than one participant at each of the monthly product process CMP meetings. CLECs can participate via phone, in person or both. The highest number of Eschelon participants at a single Monthly Product Process CMP Meeting was six people and as many as five have attended the monthly systems meetings.

Q. HOW WERE THE TERMS OF THE CMP DEVELOPED?

A. The CLEC community requested a change management process in the 271 proceedings. The net result was the creation of the CMP and a document governing how CMP would operate. This document was painstakingly negotiated and created by the industry as a whole.

Q. WHO CAN CHANGE THE TERMS OR PROCESSES OF THE CMP?

A. The industry as a whole has the ability to modify the document, as provided in *Qwest's Arizona Statement of Generally Available Terms, at Exhibit G,* which explains that the CMP is where the industry creates and modifies processes. This document, which can only be modified with a unanimous vote, defines the CMP as follows:

INTRODUCTION AND SCOPE

> This document defines the processes for change management of OSS interfaces, products and processes (including manual) as described below. ***CMP provides a means to address changes that support or affect pre-ordering, ordering/provisioning, maintenance/repair and billing capabilities and associated documentation and production support issues for local services provided by CLECs to their end users.***
>
> The CMP is managed by CLEC and Qwest representatives each having distinct roles and responsibilities. The CLECs and Qwest

> will hold regular meetings to exchange information about the status of existing changes, the need for new changes, what changes Qwest is proposing, how the process is working, etc. The process also allows for escalation to resolve disputes, if necessary.

Qwest AZ SGAT, Exhibit G (emphasis added). So, the CMP is an evolving process. ***See Exhibit JM-2.***

Q. HOW DOES QWEST MANAGE THE CMP?

A. CMP is managed through a combination of (a) monthly CMP meetings held jointly between Qwest, CLECs, and State Commissions, and (b) Qwest notifications for product, process and system changes.

Q. HOW DOES A CLEC USE CMP TO REQUEST A CHANGE FROM QWEST?

A. CLECs can use CMP to request two broad categories of changes: what we refer to as "product or process" changes on one hand, and system changes on the other. For product or process changes, CLECs can request a change to a product or process by submitting a Change Request (CR) through the cmpcr@qwest.com mailbox. Once the CR is received, Qwest reviews the request to obtain a high level understanding of the change being requested by the CLEC and then subsequently schedules a call with the CLEC to clarify its request with Qwest representatives. Then the CLEC presents its requested change at the monthly CMP meeting. After that, Qwest evaluates the CR in more detail and develops a draft response.

Q. HOW DOES QWEST RESPOND TO A CLEC'S PRODUCT OR PROCESS CHANGE REQUEST?

A. In its response to a CR, Qwest advises the CLEC whether the CR is accepted, or if denied, provides the CLEC with the reason for the denial based on one or more of the following conditions that are outlined in Section 5.3 of the Wholesale Change Management Process Document:

- Technically not feasible
- Regulatory Ruling/Legal Implications
- Outside the scope of the CMP process
- Economically not feasible
- The requested change does not result in a reasonably demonstrable business benefit (to Qwest or the requesting CLEC) or customer service improvement

See Exhibit JM-2. Then Qwest communicates its response (accepted or denied) at the next regularly scheduled monthly meeting, where the CLECs have the opportunity to discuss, clarify and comment on Qwest's response.

Q. DOES THE CLEC HAVE AN OPPORTUNITY IN CMP TO SEEK MODIFICATION OF QWEST'S RESPONSE TO ITS CHANGE REQUEST?

A. Yes. The CLEC and Qwest discuss the response in the monthly CMP meeting. Based on the discussion at the monthly meeting, Qwest may decide to modify its response. Qwest advises the CLECs whether or not it intends to do so. If Qwest does not modify its response, and the CLECs do not accept Qwest's response, any CLEC can elect to escalate or dispute the CR in accordance with the agreed upon CMP Escalation or Dispute Resolution Process. (See Sections 14.0 and 15.0 of the Wholesale Change Management Process Document.) ***See Exhibit JM-2.*** If the originating CLEC does not agree with the determination to escalate or pursue dispute resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuing the CR upon providing written notification to the Qwest CMP Manager.

Q. WHAT HAPPENS AFTER QWEST ACCEPTS A PRODUCT OR PROCESS CHANGE REQUEST IN CMP?

A. If the CR is accepted, Qwest moves forward with the development of the CR, communicates the status of the development at the monthly CMP meetings, and issues a CMP notification (Level 1, 2, 3 or 4) to the CLEC community advising of the proposed change, the effective date of the change along with a red-lined

copy(s) of the affected business procedure(s) and/or PCAT(s), if applicable. The guidelines for CLEC notification are outlined in Section 5.3 and 5.4 of the Wholesale Change Management Process Document.

Q. DOES CMP GIVE CLECs A CHANCE TO PARTICIPATE IN QWEST'S DEVELOPMENT OF AN ACCEPTED PRODUCT OR PROCESS CHANGE REQUEST?

A. Yes. Ad-hoc meetings are held as necessary to discuss the product, process or system change. The number of meetings is determined by the complexity of the request. Some CRs require minimal discussion because the request is straight forward; others require more meetings. When the process is ready to be documented, Qwest notifies the CLECs through the CMP notification process and the CLECs have the opportunity to formally comment on the proposed changes. At the close of the CLEC comment cycle, Qwest officially provides a response to their comments, again through the notification process.

Q. WHAT HAPPENS AFTER THE NOTIFICATION AND COMMENT PROCESS IS CONCLUDED?

A. Once the notification goes into effect, the CR moves into a CLEC test status, where the CLECs and Qwest have an opportunity to test the change request. The CR is subsequently closed when it is determined that there is no further activity associated to the CR. The CR is closed at the monthly CMP meeting with agreement from the originating CLEC.

Q. DOES THIS PROCESS DIFFER WHEN QWEST INITIATES A PRODUCT OR PROCESS CHANGE INSTEAD OF A CLEC?

A. Yes. For a Qwest originated product or process change, the process is slightly different. Depending on the change that is being proposed, and the "level" of the change, Qwest either issues a CLEC product/process change directly to the

CLECs via the notification process, or in some cases, Qwest also issues a CR to be developed through the process that is described above.

Q. YOU MENTION 'LEVELS' OF QWEST-ORIGINATED CHANGES. PLEASE EXPLAIN.

A. In CMP, there are five categories that Qwest utilizes to determine implementation timelines for the Qwest initiated changes:

Level 0 notifications are changes that do not change the meaning of documentation and do not alter CLEC operating procedures. Level 0 changes are effective immediately without notification. An example of a Level 0 change is font and typeface changes, capitalization or spelling corrections.

Level 1 notifications are changes that do not alter CLEC operating procedures or changes that are time critical corrections to a Qwest product/process. Time critical corrections may alter CLEC operating procedures, but only if such Qwest product/process has first been implemented through the appropriate level under CMP. Level 1 changes are effective immediately upon notification. Examples of a Level 1 change are corrections, clarifications, or additional information that does not change the product/process.

Level 2 notifications are changes that have minimal effect on CLEC operating procedures. Qwest provides notification of Level 2 changes at least twenty-one (21) calendar days prior to implementation. Examples of a Level 2 notice are documentation of a product or process that was not previously documented, contact change information or a reduction of a standard interval in Qwest's Standard Interval Guide.

Level 3 notifications are changes that have moderate effect on CLEC operating procedures and require more lead-time before implementation than Level 2 changes. Qwest provides initial notification of Level 3 changes at least thirty-one

(31) calendar days prior to implementation. Examples of Level 3 changes are modifying/changing an existing process, adding new features to an existing product or changes to customer facing center hours.

Level 4 notifications are changes that have a major effect on existing CLEC operating procedures or changes that require the development of new procedures. Level 4 changes are originated using the CMP CR process and provide CLECs an opportunity to have input into the development of the change prior to implementation. Level 4 changes follow a process similar to the CLEC initiated change requests. Examples of Level 4 changes are increasing an interval in Qwest Standard Interval Guide, development of a new product or feature and changes to the Wholesale Change Management Process Document.

Q. WHAT OPPORTUNITIES FOR COMMENT DO CLECs HAVE ON QWEST-ORIGINATED PRODUCT OR PROCESS CHANGES?

A. For any notice that Qwest sends to CLECs, CLECs have the opportunity to comment on the changes or request a change to disposition on the notice that was sent. For Level 1 changes, Qwest's notifications to CLECs state that the disposition is a Level 1. The notification includes a description of the change, states that the change is effective immediately, and that there is no comment cycle, and advises the CLECs to contact the CMP Manager immediately if the change alters the CLECs' operating procedures and requires Qwest's assistance to resolve. For any CLEC that submits comments, Qwest works to resolve the issue with the CLEC. Possible resolutions may include withdrawal of the change, re-notification under a different level or creation of a new category of change under a different level, which is required via a CR through the CMP process.

Regarding Level 2-4 notices, the CLECs have a formal comment period where they can elect to respond or make comments to the proposed changes, or request a change to disposition. If Qwest receives comments on the proposed

changes, Qwest must respond to those changes prior to implementation. In Qwest's final response to comments it may either accept the change submitted by a CLEC and make minor corrections to the documentation that was previously distributed for review, or reject the changes with a comment as to the reason for the denial. In all cases, the response to comments also includes the final implementation date. For any Level 2-4 notification, if the CLECs do not accept Qwest's response, any CLEC may elect to escalate or pursue dispute resolution in accordance with the CMP Escalation or Dispute Resolution Process, which are outlined in Sections 14.0 and 15.0 of the Wholesale Change Management Process Document.

Q. WHAT IF A CLEC DISAGREES WITH QWEST'S DETERMINATION OF A PRODUCT OR PROCESS CHANGE 'LEVEL'?

A. The CMP process gives CLECs the opportunity to request a change to disposition to a higher level (i.e. request a change from a Level 2 to a Level 3 notice). In order to do this, they must request the change within the CLEC comment cycle. Along with the request, the CLEC must also submit substantive information to warrant the change to disposition (i.e., business need or financial impact). Once a change to disposition is received, Qwest discusses the change to disposition request either at the next CLEC monthly meeting or in a separate CLEC ad-hoc meeting. In this meeting, the parties discuss the changes being made and attempt to reach resolution. If resolution cannot be reached, a vote is taken in accordance with Section 17.0 of the Wholesale Change Management Process Document and the results are determined by the majority.

Q. CAN A CLEC ASK QWEST TO POSTPONE A CHANGE THAT QWEST ORIGINATED?

A. As part of the notification process described above for Level 3 and Level 4 changes, the CLECs have the opportunity during the CLEC comment cycle to request a postponement of the proposed change. A CLEC may request that

Qwest postpone implementation of all or part of the proposed change until the issue is resolved in CMP or until the dispute is resolved pursuant to the Dispute Resolution Process. In its request for postponement, the CLEC must provide the following information, if relevant:

- The basis for the request for a postponement;
- The extent of the postponement requested, including the portions of the proposed change to be postponed and length of requested postponement;
- The harm that the CLEC will suffer if the proposed change is not postponed, including the business impact on the CLEC if the proposed change is not postponed; and
- Whether and how the CLEC alleges that the proposed change violates its interconnection agreement(s) or any applicable commission rules or any applicable law.

Q. WHEN DOES QWEST GRANT A REQUEST TO POSTPONE A CHANGE?

A. Qwest will postpone the implementation of the proposed change whenever Qwest reasonably determines that postponing the proposed change prevents more harm or cost to the requesting and any joining CLECs than postponing the proposed change imposes harm or cost upon Qwest or any CLECs who oppose the postponement. Qwest will postpone the implementation of the proposed change if it is inconsistent with a requesting CLEC's interconnection agreement, applicable commission rule or law.

Q. WHAT HAPPENS ONCE QWEST GRANTS A POSTPONEMENT?

A. If Qwest postpones the change, it is postponed for a minimum of 30 calendar days. In Qwest's response, Qwest states how long the proposed change will be postponed, the CLECs it is being postponed for, and any other pertinent information.

Q. WHEN DOES QWEST DECLINE A REQUEST TO POSTPONE A CHANGE?

A. Qwest will not postpone the implementation of the proposed change whenever Qwest reasonably determines that postponing the proposed change imposes

more harm or cost upon Qwest or any CLECs who oppose the postponement than postponing the proposed change prevents harm or cost to the CLECs supporting the postponement. Qwest provides notice in its response if the proposed change will not be postponed.

Q. WHAT DOES QWEST DO AFTER IT HAS DECLINED A REQUEST TO POSTPONE?

A. If Qwest determines that it is not appropriate to postpone the change, Qwest will include in its response the reason why the change is not being postponed, an explanation of the cost and harm evaluation, and why Qwest believes the change is consistent with ICAs or other commission rules or laws. Additionally, if Qwest does not implement the requested postponement, Qwest will not implement the changes until at least 30 calendar days following notification that the postponement is denied.

Q. YOU MENTIONED THAT CMP CAN ALSO BE USED TO REQUEST 'SYSTEM' CHANGES. HOW DOES CMP PROVIDE FOR SYSTEM CHANGE REQUESTS?

A. System changes are handled the same way, whether the change is requested by a CLEC or by Qwest. In order for a system change to be considered, a CR must be submitted through the CMP process. As described earlier regarding product or process change requests, Qwest reviews the request to obtain a high level understanding of the change being requested by the CLEC and then subsequently schedules a call with the CLEC (or Qwest originator) to clarify the request with Qwest representatives. The CR is then presented by the CLEC or Qwest at the next monthly CMP meeting. After the CR has been presented, Qwest evaluates the CR in more detail and develops an estimated level of effort (LOE) or estimated hours that it will take Qwest to implement the requested change along with the business impact. Qwest then determines whether it will accept or deny the system change request and develops a draft response. In its

response, Qwest advises the CLEC whether the CR is accepted (naturally, the Qwest CR is accepted or it would not have been submitted), or if denied, provides the CLEC the reason for denial based on the conditions that are outlined in Section 5.1.4 of the Wholesale Change Management Process Document (which are also the same conditions discussed previously for product and process CRs).

Q. WHAT HAPPENS WHEN A SYSTEM CR IS ACCEPTED?

A. If the CR is accepted and the CR is requesting a change to Qwest's OSS interfaces (hereinafter "IMA"), the CR is placed into the bucket of existing CRs awaiting prioritization. Qwest goes through a ranking process, currently bi-annually, to prioritize all of the IMA CRs. Upon completion of the ranking, CRs are ranked according to the number of points it received, with the CR with the highest number of points being number one on the list. Then based upon the total number of hours that are available for enhancements within a given release, Qwest determines the total number of CRs that can be implemented. It is important to note that both the Qwest and CLEC CRs are included in this bucket of IMA enhancements and both are given equal weight. For those CRs that do not make the next IMA release, they remain in a pending prioritization status awaiting the next IMA prioritization.

Q. IS THE POST-ACCEPTANCE PROCESS DIFFERENT FOR CHANGES TO OTHER QWEST SYSTEMS, BESIDES THE OSS INTERFACES THAT YOU'VE JUST DESCRIBED?

A. For accepted system changes in other areas, such as Qwest's Billing or Maintenance and Repair Systems, depending on the number of CRs that are pending and the number of hours that are available for enhancement in a given release, the CRs may or may not have to be prioritized. The Wholesale Change Management Process Document states that if there are more CRs pending than the applicable release has capacity for, the CRs will be prioritized. If Qwest can

work all of the CRs that are pending in a particular release, prioritization is not necessary.

Q. WHAT DOES CMP PROVIDE FOR CLECs WHO DISAGREE WITH QWEST'S DISPOSITION OF A SYSTEM CHANGE REQUEST?

A. If a system CR is denied by Qwest, or if any CLEC does not accept Qwest's response, any CLEC may elect to escalate or dispute the CR in accordance with the agreed upon CMP Escalation or Dispute Resolution Process. (Sections 14.0 and 15.0). If the originator of the CR does not agree with another CLEC's determination to escalate or pursue dispute resolution, it may withdraw its participation from the CR and any other CLEC can pursue the CR escalation upon providing written notification to the Qwest CMP Manager. If any CLEC does not accept Qwest's response and does not intend to escalate or dispute it at the present time, they can request to have the status of the CR changed to 'Deferred,' which ultimately puts the CR into a holding bin indefinitely. The CR remains deferred and any CLEC may re-activate the CR at a later date.

Q. DOES CMP PROVIDE ANY OTHER OPTIONS FOR THE ORIGINATOR OF A SYSTEM CHANGE REQUEST WHO DISAGREES WITH QWEST'S DISPOSITION?

A. In the event that Qwest denies a CR for economically not feasible reasons, or a CLEC or Qwest wants a CR to be worked that was not ranked high enough on the prioritization list, or CLEC/Qwest submitted a CR after prioritization had occurred and wishes to still try to have the enhancement included in the next system release, Qwest or the CLEC can choose to invoke the Special Change Request Process, whereby the CLEC/Qwest opts to pay for the system change outside the normal prioritization process. Qwest works with the CLECs in this scenario to see if it has additional resources that can implement the CR. Other than the Special Change Request Process, the same dispute resolution procedure is available.

Q. DOES CMP PROVIDE TECHNICAL INFORMATION TO CLECs REGARDING SYSTEM CHANGE REQUESTS?

A. With all system releases, Qwest provides draft technical specifications, as well as final technical specifications, to the CLEC community via an external notification that outlines the proposed system changes. These notices are done through the CMP system notification process and all associated PCATs, Business Procedures, and Local Service Ordering Guidelines (LSOG) are updated through the product/process notification process in conjunction with the release.

Q. WHAT HAPPENS AFTER A SYSTEM CHANGE HAS BEEN IMPLEMENTED?

A. Following the same process as the product and process CRs, once a system change has been implemented, the CR goes into a CLEC test status where all CLECs have the opportunity to test the system change. Once it is determined that no additional work is required associated to a particular system change, the CR is closed at a monthly CMP meeting.

Q. HAVE ANY CHANGE REQUESTS DEVELOPED THROUGH CMP CONFLICTED WITH INTERCONNECTION AGREEMENTS?

A. No. Of the 969 Change Requests that have been accepted through the CMP process, none of them have resulted in creating a conflict with CLECs' ICAs.

III. DEVELOPMENT OF PROCESSES IN CMP TO EXPEDITE ORDERS

Q. HOW DID THE PROCESS FOR EXPEDITING ORDERS BECOME PART OF THE CMP?

A. In 2000, when Eschelon opted into the AT&T interconnection agreement in Arizona, Qwest had an existing process in place for expediting orders for unbundled loops. This was documented externally through the appropriate CLEC notification process for publication of V1 (Version 1) of the Expedites and Escalation Overview on the Qwest Wholesale web site. Although this process was not formally negotiated from the start through the CMP process, this was the

existing process that Qwest had in place for its customers and the process, when published, was not challenged by the CLEC community.

Q. HAS THE PROCESS FOR EXPEDITING ORDERS BEEN MODIFIED AND DEVELOPED THROUGH THE CMP?

A. Yes. Through CMP, Qwest has modified the expedite process on numerous occasions via requests from CLECs through a CMP CR, through an External Documentation Change Request or via a process change initiated by Qwest. The following table provides an overview of the changes that have transpired that are specific to the expedite process. Not all version updates are included in the table because the Expedite and Escalations Overview contains processes that are not specific to expedites (like escalations or contact information, for example).

PCAT Version Number	Summary of Change
1	Version 1 documented the existing expedite process externally. This formally documented the process for the CLEC on the Qwest Wholesale web site.
6	This was a Level 2 notice that added additional information to an already existing process. V6 made changes to the expedite section: • Added the expedite reason for medical emergencies that was not previously documented • Added a link to Local Service Ordering Guide (LSOG) • Clarified and added additional information on how to expedite a service request
8	This was a Level 2 notice that added more information around the already existing process. In the Introduction section, Qwest clarified escalations vs. expedites to add more clarity between the processes. Under the Expedites subsection, the request and eligibility processes were defined in more detail. Under the Escalation subsection, a clarification regarding Qwest contacts was added. In the Contact section, a correction was made regarding the ASR Frame Relay contact and a telephone number was added to LSR Tier 1. Additional information was included in this update which provides what type of action occurs depending

	on the type of service on the account.
11	This was a Level 3 notice associated to CLEC CR PC 021904-1. This CR was submitted by Covad, requesting the capability to expedite a request for a fee. Covad stated that Qwest didn't have an expedite process for CLEC caused errors and that Covad was requesting Qwest to implement a process that would allow them to have a shorter interval for a fee. With this CR, Qwest made changes in two phases. First, on Version 11, for a subset of designed services products, the Pre-Approved Process was created, which allowed CLECs the opportunity to have an expedited due date regardless of the reason for the expedite. When the CLEC chose this process, they also signed an amendment so that their ICA included language for expedites with a per day expedite rate. When the Pre-Approved Expedite Process was created, the old process was renamed to the Expedites Requiring Approval process, to create a distinction between the two processes. The second phase of the CR was looking at the existing reasons that an expedite would be granted at no cost. Through discussions with the CLEC community changes were made with V22, which is described later in more detail.
17	As part of Qwest's effort to continue monitoring the expedite process it was determined that Qwest's Resale customers should be utilizing the expedite process that is described in the individual Retail State Tariffs. With this realization, Qwest issued a Level 3 notice to change the process to advise the CLECs that an amendment is not required for Resold Design Products and that LSRs received for Resold Design Products are automatically included in the Pre-Approved Expedite process.
19	Clarified in the PCAT via a Level 1 change that if an expedited due date is missed due to Qwest reasons that expedite charges do not apply. Also clarified that if an expedited order goes delayed on the due date that Qwest will work with the CLEC to obtain the best due date possible and expedite charges do not apply.
22	Associated with CLEC CR PC021904-1, a Level 3 notice was issued to change the process too add three new expedite reasons to the Expedites Requiring Approval process. Language was also added related to providing service order number information that caused the expedite condition. Eschelon was heavilty involved with the discussions around this change and 2 of the 3 conditions that were added were brought to the table by Eschelon.

24	Another decision as part of the continued evalutaion of the expedite process was to change the Pre-Approved Expedite process to bill expedite charges per ASR/LSR instead of per order. This effort reduced the overall expedite charges that a CLEC was paying when multiple circuits were request on the same ASR/LSR. Additionally, for expedited due date requests on delayed orders, Qwest revised its expedite process to only bill expedite charges if the expedited due date request results in Qwest incurring additional costs to improve the Ready for Service date. Qwest believes that both of these measures resulted in improved customer service to the CLECs. This change was notified as a Level 3 process change.
27	Changed the process to include 2w/4w Unbundled Loops and Port In/Port Within requests to list of products that are included in the Pre-Approved Expedite process. This change increased the CLECs availability to be able to expedite a request without a specific reason, and it also created consistancy for both Qwest and the CLECs across the product line. This was also noticed via a Level 3 process change.
29	Qwest initially issued this update as a Level 1 notice to add clarity to some of the expedite reasons that are listed in the Expedites Requiring Approval process. There was confusion around the intent based on expedited requests that Qwest was receiving from its CLEC customers. This update did not change the existing process in any way, nor did it change the way that Qwest was approving or denying expedite requests. It simply added additional clarification to the existing bulleted items. For example, on the condition for medical emergency, Qwest attempted to add the following clarification: (Where service is crucial to critical care. A medical condition does not necessarily constitute a medical emergency.) And, for the bulleted item: Conditions where your end-user is completely out of service (primary line), Qwest attempted to add clarification that disconnects in error are not included in this scenario. Eschelon disagreed that this was a clarification and stated that it is really an undocumented existing process. Qwest does not agree. Adding a new bulleted item such as the medical emergency condition that was added via a Level 2 notice on Version 6 is an undocumented existing process. Adding clarification to the existing bulleted item is a Level 1 clarification. This update was retracted and not published on the Wholesale web site due to the request by Eschelon.
30	A Level 3 notice was issued to change the process to require

	expedite language in a CLECs ICA where expedites are associated with a per-day expedite charge for products that are included in the Pre-Approved Expedite Process. This changes the process to be in parity with the rest of Qwest's customer base who orders services that follow the designed services flow.
34	Qwest missed a sentence that should have been updated with the change in V30; and issued this correction to delete sentence so it would be consistent with the paragraph above it. This was noticed via a Level 1 notification.
35	As a result of CLEC CMP CR PC112105-1 submitted by AT&T, Qwest changed the expedite process to allow CLECs to be able to expedite the Customer Not Ready standard interval of 3-days. When a due date is missed due to customer reasons, Qwest standard interval is three business days to reschedule the installation of the service (on products that follow the designed services flow). As a result of this CR, the CLECs now have the ability to expedite the 3-day interval. This was noticed via a Level 3 process change.
41	Changed the process to include a 12PM MT cut-off for same day due date expedites for requests that qualify in the Pre-Approved Expedite section of the method. This change provides better customer service as Qwest can better meet same day due dates that are requested by our customers.

Q. DID QWEST CONTINUE TO MONITOR THE EXPEDITE PROCESS AFTER THE IMPLEMENTATION OF V11?

A. Yes. The implementation of V11 of the expedite process created additional expedite options and capabilities for the CLECs. Many CLECs took advantage of the new process for a specific set of design services products. It also resulted in different behaviors on the part of CLECs taking advantage of the new option and other areas of concern for Qwest.

When V11 of the Business Procedure went into effect, I trained Qwest personnel internally on the process, and re-educated them regarding the specific reasons that justified granting a request for an expedite without requiring payment of a fee (i.e., fire, flood, medical emergency, etc.). The reason for the training was to educate the Qwest team on the new process and to refresh personnel about the

requirements of the old process to ensure Qwest treated all customers equitably within the confines of the newly defined process. For design services, we wanted to make sure that we consistently applied the rules when an expedite was granted and a contract amendment was not signed, so that we were not providing some expedites for free (when an emergency condition did not exist) when others were paying for expedites under those circumstances (when an amendment was signed). Additionally, for non-design services we wanted to make sure we were treating our customers equitably across the market segments. With this training came renewed awareness of the process within Qwest, which the CLECs community subsequently started to see through more consistent denials on expedited requests. Eschelon, for one, started seeing situations where expedites were being denied that were not consistently being denied prior to the implementation of V11. We had discussions around this at CMP and Qwest subsequently provided temporary relief of the pain Eschelon was having around having expedites being denied for issues associated with features on their customer's lines that Qwest had not been consistently denying prior to the implementation of V11. The issue was later resolved when the additional item of "Business Classes of Service where hunting, call forwarding or voice mail features are not working correctly due to previous order activity where the end-users business is being critically affected" was added as one of the additional changes associated to the expedite process with V22.

Q. WERE THERE OTHER MINOR CHANGES MADE TO THE EXPEDITE PROCESS THROUGH THE CMP ?

A. Yes. Qwest determined that additional clarification and improvements were needed on the process. For instance, Qwest subsequently updated the process to:

Clarify that expedite charges do not apply for expedited requests where Qwest misses the due dates or on orders that are delayed on the due date.

Drive consistency and parity with the Resale and Retail customers who requested expedited due dates on like products so that customers who order from the same tariffs are treated equitably.

Change the process to bill expedite charges per ASR/LSR instead of per service order and only bill expedite charges on orders that are delayed prior to the due date when Qwest incurs costs. This was a significant overall cost reduction to the CLECs on the amount of expedite charges that Qwest billed per expedite order.

Add three new reasons to justify an expedite to the Expedites Requiring Approval Process. This was associated with the Covad CR mentioned previously and was of benefit to the CLECs.

Q. YOU MENTIONED THAT THE IMPLEMENTATION OF VERSION 11 RESULTED IN DIFFERENT BEHAVIORS BY CLECS AND OTHER AREAS OF CONCERN FOR QWEST. CAN YOU ELABORATE ON THAT FURTHER?

A. Yes, in monitoring the expedite process, Qwest was seeing cases where CLECs were abusing the Expedites Requiring Approval process by claiming that expedites were for one of the defined reasons, when in reality they were not. In one specific instance, a CLEC was changing the exact same letter from a medical facility stating a medical reason for an expedite and using the letter over and over again to gain approval on multiple expedites as though they were medical emergencies. In other situations, CLECs were issuing orders to Qwest to disconnect their end users for non-payment and later submitting a New Connect order to restore the service. When this occurred, the CLECs often attempted to request an expedite using one of the qualified expedite reason like "Conditions where your end-user is completely out of service (primary line)" condition. In reality, the CLECs should have been using the documented Deny/Restore process, which allows a same day due date that would have negated the need for an expedite. Another situation Qwest experienced was

having CLECs trying to escalate expedite requests when they did not have an expedite amendment, and the situation did not qualify for an expedite under the Expedites Requiring Approval Process. These types of situations placed an undue burden on Qwest, which subsequently required Qwest to ask additional clarifying questions to determine whether the expedite request was legitimate. These are examples that drove Qwest to revisit the issue of which products should be included in the Pre-Approved expedite process.

After Qwest addressed the questions about which products should be included in the Pre-Approved Expedite process, as well as assuring that it handled expedite requests consistently and equitably, Qwest issued V27 and V30 to notify the CLEC community.

Q. WHY DID QWEST ISSUE SEPARATE NOTICES FOR VERSIONS 27 AND 30?

A. These versions contained two separate issues that were being reviewed within the expedite process. V27 was intended to created consistency for the CLECs and Qwest across the product line and V30 was initiated to create parity for Wholesale and Retail customers alike. At the time that the process change on V27 was sent to the CLEC community to include the 2w/4w Analog Unbundled Loops, resolution was not finalized as to whether or not Qwest would require an amendment. Qwest believed that it was in the best interest of all parties involved to implement the changes in V27 and V30 as quickly as possible. Hence, Qwest issued two separate notices.

Q. DID QWEST DETERMINE THAT THE EXPEDITE PROCESS COULD BE MODIFIED IN CMP BY REQUIRING AN AMENDMENT TO ICAS?

A. Yes. When Qwest was evaluating Covad's CR concerning expedites, which requested an improvement to the process to allow expedites for a fee, Qwest had to look at existing ICAs to see if the contracts allowed Qwest to charge for expedites. Qwest's investigation found that some ICAs had existing expedite

language in the LIS section that referred the CLEC to Qwest's individual Intrastate Access Tariffs. However, there was no such language for the other products such as Unbundled Network Elements. Many of the rates in the ICAs for expedite charges simply said TBD. In order for Qwest to be able to allow CLECs to order expedites for a fee on additional design services, Qwest determined that the ICAs should be amended to include language for the other design services similar to that in the LIS section, so that the ICAs contained a specific rate with a reference to the process. This analysis resulted in development of the expedite amendment, which is now included in Qwest's new ICA templates. The amendment included a reference to the Expedite and Escalations Business Procedure for the process and included a rate sheet for the $200.00 per day expedite fee.

Q. HOW DID QWEST APPROACH OBTAINING THE NECESSARY AMENDMENTS OF ICAs AND IMPLEMENTING VERSION 30'S CHANGES TO THE EXPEDITE PROCESS?

A. When Qwest issued the change to V30 of the Expedites and Escalations Overview, Qwest understood that there would be CLECs that needed to sign the expedite amendment and have it processed in order to be able to order expedites on an ASR or LSR. Qwest issued a Level 3 process notice on October 19, 2005 with an effective date of January 3, 2006. Level 3 notices can be implemented in as few as 31 calendar days following the notice. However, Qwest provided the CLEC community with 2 ½ months advanced notification. Additionally, at the request of Eschelon, Qwest hosted an ad-hoc call with the CLEC community on November 1, 2005 in an attempt to further clarify the changes and answer any CLEC questions.

Q. DID ANY CLECS DISPUTE IN CMP THE VERSION 30 CHANGE OF THE EXPEDITE PROCESS?

A. No. Although some CLECs expressed dissatisfaction on the ad-hoc call on November 1 associated with the proposed process change included in V30, neither the CLECs that attended that call nor any of the CLECs that received the advanced process notification elected to take the issue to the Oversight Committee or to postpone, escalate or dispute the proposed Level 3 process change. These are all options that the CLEC community, including Eschelon, had regarding a Qwest initiated process change per the Qwest Wholesale Change Management Process Document. The only CLEC who to my knowledge has disputed V30 in any way is Eschelon, who filed this complaint, and that dispute was not made as part of the CMP process.

Q. PLEASE EXPLAIN WHAT YOU MEAN, THAT ESCHELON DID NOT USE THE CMP PROCEDURES TO DISPUTE OR ESCALATE V30?

A. Eschelon could have chosen to invoke the CMP Dispute Resolution process, which is described in Section 15 of the Wholesale Change Management Process Document, under which process they could have taken this issue to the Commission as early as November 2005. Had they done so, they could have sought the Commission's approval for at least an interim expedite process before Eschelon disconnected the Marc Center in error. The CMP Document specifically states: "Without the necessity for a prior ADR Process, Qwest or any CLEC may submit the issue, following the commission's established procedures, with the appropriate regulatory agency requesting resolution of the dispute." This provision is not intended to change the scope of any regulatory agency's authority with regard to Qwest or the CLECs". The Dispute Resolution Process also provides CLECs with the option to take the issue in front of an arbitrator instead of a commission. Eschelon did not invoke either of these two options in

regards to the changes associated to V30, but instead waited until after it had caused a problem for its customer, the Marc Center.

Q. ESCHELON WITNESS BONNIE JOHNSON STATES THAT QWEST ATTEMPTED TO CHANGE THE EXPEDITES PROCESS TO EXCLUDE CLEC-CAUSED DISCONNECTS IN ERROR, BUT RETRACTED ITS PROPOSAL AFTER ESCHELON OBJECTED. HOW DO YOU RESPOND?

A. Bonnie Johnson is referring to the Level 1 notice that was issued with V29 to add additional clarification around disconnects in error among other items. Eschelon's objection, submitted by Kimberly Isaacs, was not that Qwest was trying to "change" the process associated with disconnects in error, but rather that the notice should have been issued as a Level 2 notice, which documents an undocumented existing process. The email states: *"updates to Expedite and Escalation V29 PCAT are not simple clarifications to the existing expedite process. These updates are documenting limitations to the expedite process that have not been previously documented. According to section 5.4.3 of the CMP document, documentation concerning* ***existing processes/products not previously documented*** *are assigned a Level 2 designation. Therefore, Eschelon requests that Qwest withdraw notice…."* ***See Exhibit JM-3*** (emphasis added) By Eschelon's own admission, they are not suggesting that Qwest is trying to "change" the process or Eschelon would have objected and asked Qwest to issue a Level 3 notification, which is a modification or change to an existing process. Qwest's process for denying requests for customer caused disconnects has not changed. Eschelon is fully aware that non-Qwest caused disconnects in error are not a qualified expedite reason. Eschelon included Qwest's Retail Expedites for Non-Dispatchable Service Orders procedure as part of its testimony. That procedure clearly states that "an expedite will only be granted if the DIE [Disconnect in Error] is Qwest generated". It also further states that Disconnect (D) orders are Non-Valid Expedites. Qwest's refusal to grant an expedite for disconnects in error caused by the CLECs is fully compliant with Qwest's processes.

Q. ESCHELON WITNESS BONNIE JOHNSON STATES THAT RATES ARE OUTSIDE THE SCOPE OF THE CMP. HOW DO YOU RESPOND?

A. Rates are outside the scope of CMP. However, in regard to the issue around expedites and the amendment to the ICA, there were questions that were raised at CMP around what the costs would be when Qwest was developing the process and whether Retail customers would pay a fee as well. Qwest shared at CMP, on a couple of occasions, what the targeted price was, and then the price that was being filed in the Qwest's tariffs so that the CLECs would know what Qwest was looking at from a rate perspective. Once the filings were available to the CLECs and Qwest's entire customer base as a whole, as Qwest has always done in the past with rate issues, Qwest started to refer the CLECs to the tariff filings, or the expedite amendment/negotiations template to see the actual fee that was being established. When Qwest received Escalation #39 from McLeodUSA, on October 27, 2005, Qwest did not deny the escalation solely because rate issues were outside the scope of CMP, as Eschelon suggests. McLeodUSA's reason for escalation was two fold: 1) McLeodUSA claimed that it did not know the process change was in the works; and 2) that McLeodUSA wanted 2w/4w loops to remain in the Expedites Requiring Approval process and thus incur no charge for an approved expedite. McLeod expressed concern that a $200 per day charge would make it unlikely that CLECs would request an expedite on a 2w/4w loop. In Qwest's response to Escalation #39, Qwest clarified that notification of the process change was distributed on September 12, 2005, encouraging customers to comment by September 27th. The response also reiterated that the notice included a statement that CLECs who already had an amendment were automatically included in the change. As for the cost issue in the escalation, the original determination of the cost was not negotiated through the CMP process. It was determined outside the scope of CMP through the individual tariff filings and the signing of the expedite amendment. Therefore, it was not appropriate to discuss the costs associated with expedites through an

escalation in CMP. As additional clarification, when the expedite amendment was originally made available to the CLEC community, it was done via a non-CMP notification, signed and implemented outside of any CMP process. The CLECs were in agreement along the way that the rate was not a CMP issue.

IV. ESCHELON PARTICIPATION IN CMP AND SPECIFICALLY IN THE PAST CMP-DEVELOPED EXPEDITE PROCESSES

Q. ESCHELON CLAIMS THAT THE CMP IS A "ONE SIDED PROCESS", IS THIS TRUE?

A. It can't be -- and this is evidenced by all of the processes that I have discussed above as well as Eschelon's active participation in the CMP since 2001. Eschelon is one of the most engaged CLECs in the CMP Process and it fully understands how much influence it has over the end results in the CMP. There have been numerous CRs or action items that have been discussed in CMP or in separate ad-hoc meetings where the CLECs have had input to mutually decide final outcomes. Many of them are a direct result of actions taken by Eschelon. Qwest does have a right to run its business, but it actively listens to the CLEC community and is very willing to implement changes that make good business sense for all parties involved.

Q. HAS ESCHELON PARTICIPATED IN CMP BEYOND SUBMITTING CHANGE REQUESTS?

A. Yes. Eschelon routinely participates in CMP in areas outside of the CR process. It participates by receiving product/process and system notices, by submitting comments to the Qwest comment mailbox, by requesting documentation updated through the External Documentation Change Request process, and by being a participant on the CMP Oversight Committee. Eschelon frequently submits comments in response to Qwest Product and Process notices, and, in fact, has submitted approximately 50% of the overall comments received from the CLEC community in Qwest's cmpcr@qwest.com and cmpcomm@qwest.com

mailboxes. These comments include formal comments, informal comments, requests for additional information and changes to disposition (i.e., requesting that Qwest change a Level 2 to a Level 3 notice). Of the 63 requests to change the disposition or objections to a Qwest Product or Process notification, Eschelon submitted 41 (65%) of those requests. Eschelon submitted 75% of the requests to update or add clarification to existing PCATs and Business Procedures through the External Documentation Requests Process. Eschelon also participates in a CLEC forum meeting that is held the Monday before the Qwest monthly CMP meeting, in which CLECs discuss specific issues associated to Qwest related CRs and notices. Eschelon has provided brief synopses of the topics discussed in the regularly scheduled monthly CMP meetings. This further illustrates how CMP is not a one sided process.

Q. WHAT IS ESCHELON'S INVOLVEMENT IN THE CMP OVERSIGHT COMMITTEE?

A. Eschelon has consistently been a member of the CMP Oversight Committee, which consists of a group of CLECs, Commission and Qwest personnel that act as subject matter experts regarding the provisions of CMP. The CMP Oversight Committee deliberates on CMP Oversight Review Issues and makes recommendations to the CMP body on matters such as interpretation of CMP and proposed changes to CMP. It is stated in the Wholesale Change Management Process Document that the Oversight Committee Members must have a comprehensive understanding of CMP.

Q. HAS ESCHELON PARTICIPATED IN THE CMP DEVELOPMENT OF EXPEDITE ORDERS?

A. Yes, and for years, Eschelon accepted and took advantage of the changes made in CMP to the process for expediting orders for unbundled loops. It accepted all of these changes and did not assert that any were in violation of its ICA until recently. Version 27 contained the first change that Eschelon objected to, and

Eschelon did not object to V27 until Qwest notified the CLECs of the process change associated with V30, which brought the CLEC expedite process in parity with all of Qwest's other customers who order services that follow the designed services flow (Retail and Wholesale customers alike). Though Eschelon did not invoke the CMP procedures for postponement, deferral or dispute resolution, Eschelon nonetheless has refused to execute the amendment to implement the changes contained in V30.

Q. WHAT HAVE OTHER CLECs IN ARIZONA DONE WITH RESPECT TO THE CURRENT EXPEDITE PROCESS?

A. Fourteen of 88 CLECs in Arizona already have ICAs, which reference Qwest expedites for a fee– Eschelon is not one of these CLECs. This equates to approximately 17% of the CLECs overall in AZ. There are 14 CLECs that signed an expedite amendment that were not part of QPP, and half of those CLECs have ordered Unbundled Loops since that time, providing them the opportunity to expedite their requests. I am unaware of any customer in Arizona (or outside of AZ for that matter) who has refused to opt into the new expedite amendment, and demanded expedited orders for an unbundled loop nonetheless. Eschelon stands alone in this regard.

V. QWEST REQUIRES ITS RETAIL CUSTOMERS WHO ORDER DESIGN SERVICES TO PAY $200 PER DAY TO EXPEDITE SIMILAR ORDERS

Q. DOES QWEST ALLOW RETAIL CUSTOMERS TO EXPEDITE ORDERS ON TERMS MORE FAVORABLE THAN FOR CLECs IN THE SAME CIRCUMSTANCES?

A. No. I am aware that in this action, Eschelon has argued that Qwest expedites orders for its retail customers in emergency circumstances at no charge, but does not expedite orders for CLECs under similar circumstances. This allegation is simply inaccurate.

Q. HOW IS ESCHELON'S ARGUMENT THAT QWEST FAVORS ITS RETAIL CUSTOMERS ON EXPEDITES INCORRECT?

A. The error in Eschelon's argument is that instead of comparing the retail expedite terms for services comparable to unbundled loops (which is the service whose expedite terms Eschelon wants to change in this action), Eschelon compares the expedite terms for two very different categories of services that require very different resources to expedite and thus cannot be compared. Eschelon's argument is a classic apples versus oranges scenario.

Q. WHAT ARE THE TWO CATEGORIES OF SERVICES THAT ESCHELON COMPARES?

A. The two categories are design,and non-design. Eschelon specifically compares a retail non-design service to a wholesale design service. Qwest's processes for ordering/provisioning/repairing "non-design services" differs from Qwest's processes for ordering/provisioning/repairing "design services." This is a well known fact.

A non-design service, also known as POTS ("Plain Old Telephone Service"), is a very basic telephone service. QPP is one type of POTS type service offered to CLECs. Inventory for a non-designed service is provisioned out of Qwest's Loop Facility Assignment and Control System ("LFACS") database. A non-designed service is identified by a 13-digit code that is a combination of a 3-digit customer code and a 10-digit telephone number.

A design service is a more complex service. Inventory for a designed service is provisioned out of both LFACS and the Trunk Inventory Record Keeping System ("TIRKS"). A designed service is identified by a circuit id. Provisioning intervals for designed services are generally longer than that of non-designed services, as provisioning of designed services is more complex.

Q. WHY DOES IT MATTER FOR EXPEDITING WHETHER THE ORDERED SERVICE IS NON-DESIGN OR DESIGN?

A. Qwest's method for expediting orders for design services and non-design services differs. Qwest consistently uses one process – for Qwest and CLECs alike – on non-design, POTS type services. Qwest consistently uses a different process – for Qwest and CLECs alike – on design services. Far from discrimination, Qwest is doing exactly what Eschelon requests – providing "expedites on the same terms and conditions as Qwest provides to itself in serving its retail customers."

Q. WHAT IS QWEST'S PROCESS FOR EXPEDITING NON-DESIGN SERVICES?

A. The expedite process for non-designed or POTS type services for Qwest and CLECs alike require the Customer to contact Qwest to discuss the nature of the expedite. CLECs have the option to pre-populate the expedite (EXP) field on the LSR with a "Y" indicating that they would like to expedite the request (which ultimately speeds up the provisioning process if the expedite is granted); however, a call is still required into the Qwest Call Center to discuss the specifics of the expedited request. Guidelines have been established for both the Wholesale and Retail customer alike to determine if an expedite request should be granted. Those conditions are:

- Fire
- Flood
- Medical emergency
- National emergency
- Conditions where your end-user is completely out of service (primary line)
- Disconnect in error by Qwest
- Requested service necessary for your end-user's grand opening event delayed for facilities or equipment reasons with a future RFS date
- Delayed orders with a future RFS date that meet any of the above described conditions
- National Security

- Business Classes of Service unable to dial 911 due to previous order activity
- Business Classes of Service where hunting, call forwarding or voice mail features are not working correctly due to previous order activity where the end-users business is being critically affected

Q. IF A CUSTOMER MEETS ONE OF THOSE CONDITIONS, WHAT ARE QWEST'S NEXT STEPS TO EXPEDITE A NON-DESIGN SERVICE?

A. Upon discussions with the Customer, if Qwest determines that the request is a legitimate request and it falls into one of the conditions that are listed above, Qwest then investigates to see if it can meet the expedited due date based upon resource availability. If resources are available, the expedite is granted and the service request can proceed through the provisioning process. For requests that are initiated by a CLEC, the next step is to determine if the EXP field on the LSR was populated with a "Y". If it was, the order will proceed and a Firm Order Confirmation (FOC) is sent to the CLEC acknowledging the expedited due date. If it was not, the CLEC must supplement the LSR to populate the EXP field with a "Y" and correct the Desired Due Date on the LSR, if applicable, within four business hours or a FOC is returned with the Standard Interval and the expedite request is denied. There may be instances where Qwest may have to offer an alternate expedited due date and in those situations it will confirm that the alternate date is acceptable to the customer. In the event that it is determined that the service request does not qualify for an expedite, Qwest provides the reason for the denial to the CLEC. On expedites for non-design POTS services, there are no expedite charges associated to acceptance of the expedited request. Copies of the retail document describing this process, as well as the document adopted in CMP which governs CLEC expedites of POTS services, are attached as ***Exhibit JM-4*** and ***Exhibit JM-5,*** respectively.

Q. WHAT IS QWEST'S PROCESS FOR EXPEDITING DESIGN SERVICES?

A. Qwest utilizes a completely different process to expedite orders for designed services. Most importantly, the customer need not provide specific reasons to justify an expedite request. Instead, an expedite fee of $200 is assessed for every day that the due date is improved. Customers can simply request an expedited due date and, based upon resource availability, the expedite is granted. No discussion needs to take place with Qwest to request the expedite and no call is required into the Qwest Call Center.

Q. IS THE DESIGN SERVICE EXPEDITE FEE IN ANY OF QWEST'S RETAIL TARIFFS?

A. Yes. Qwest's Arizona Competitive Private Line Transport Services Price Cap Tariff (***see Exhibit JM-6***) and the FCC #1 Interstate Access Tariff (***see Exhibit JM-7)*** were updated in 2004 to include the per day improved expedite fee.

a. The private line tariff provision regarding expedites reads as follows:

4.1 GENERAL (CONT'D)

4.1.4 EXPEDITE

A. If a customer desires that service be provided on an earlier date than that which has been established for the order, the customer may request that service be provided on an expedited basis. If the Company agrees to provide the service on an expedited basis, an Expedite Charge will apply. The customer will be notified of the Expedite Charge prior to the order being issued.

B. If the Company is subsequently unable to meet an agreed upon expedited service date, no Expedite Charge will apply unless the missed service date was caused by the customer.

C. The Expedited Order Charge will be applied when the customer requests a service date that is prior to the standard interval service date as set for in the Qwest Corporation Service Interval Guide (SIG) on an order or when a customer requests an earlier service date on a pending standard or negotiated interval order.

The Expedited Order Charge, as set forth below, will apply on a per order basis for each day the service date is advanced.

	USOC	NONRECURRING CHARGE
• Per day advanced	EODDB	$200.00

The Expedited Order Charges will be billed in addition to other applicable nonrecurring charges.

See ***Exhibit JM-6***.

b. The Arizona QC Access Service Price Cap Tariff and Price List, Arizona QC Competitive Advanced Communications Services Price Cap Tariff, Arizona QC Competitive Advanced Communications Services Price Cap Tariff No. 2 and the Arizona QC Exchange and Network Services Price Cap Tariffs were also changed to refer to the process that is outlined in the Arizona QC Competitive Private Line Transport Service Price Cap Tariff.

Q. HOW DOES THE CURRENT EXPEDITE PROCESS DEVELOPED IN CMP COMPARE TO THE EXPEDITE PROCESS IN THOSE RETAIL TARIFFS?

A. In essence, with the tariff filings in 2004, all of Qwest's customers for design services (Retail, Wireless, Interexchange Access, etc.) – with the sole exception of CLECs – could only obtain an expedite on designed services if they paid a $200 per day expedite fee. With the process change that occurred on January 3, 2006, the CLEC process was changed to be in parity with Qwest's entire customer base. ***See Exhibit JM-7.***

Q. WHAT PROCESS OCCURS WHEN A CLEC WANTS TO EXPEDITE A DESIGN SERVICE?

A. From a Wholesale ordering perspective, customers simply need to populate the EXP field on the ASR/LSR with a "Y" and Qwest begins the investigation to see if resources are available to meet the requested due date. For CLECs, an additional step is included to validate that their ICA contains language and rates that set forth the per day expedite fee. If the ICA does not contain the appropriate language, the expedite is denied and Qwest sends the customer a FOC with the standard interval. If all of the checks and balances are in place and Qwest has the available resources, the expedite charges are added to the service order and Qwest sends the customer a FOC acknowledging the expedited due date. If Qwest does not have resources available, or if Qwest needs to offer an alternate date, Qwest contacts the customer to discuss the different options.

Q. ARE THERE ANY EXCEPTIONS TO QWEST BILLING THE EXPEDITE CHARGES FOR CLECs OR RETAIL CUSTOMERS?

A. For CLECs and retail customers alike, there are only a few exceptions to the billing of expedite charges:

- If Qwest missed the due date that was confirmed to the customer.
- The order went delayed "on" the due date and the newly established ready for service due date was expedited.
- The request was for part time audio or video.
- The order was a delayed order prior to the due date, which was later expedited and Qwest did not incur additional costs to improve the ready for service date.

Q. WHAT PROCESS OCCURS WHEN A RETAIL CUSTOMER WANTS TO EXPEDITE A DESIGN SERVICE?

A. Retail customers follow a similar process, except that the request for an expedited due date is done live with a Qwest representative. Once the request is received, the Retail representative starts the investigation to determine resource availability and adds the appropriate expedite charges to the service order if the expedite can be granted. The Retail representative contacts the customer when necessary to offer an alternative date or advise that the expedited request cannot be granted and offers an explanation. Retail customers also have the same exceptions that Wholesale customers do when it comes to expedite charges not being billed as described above. Otherwise, expedite charges are billed per the appropriate Interstate or Intrastate tariffs.

Q. ARE YOU AWARE THAT ESCHELON POINTED TO DIFFERENT RETAIL TARIFF LANGUAGE IN ITS MOTION FOR SUMMARY JUDGMENT?

A. Yes. I submitted an Affidavit in Support of Qwest's Response to that Motion, which addressed the tariff terms that Eschelon had pointed to, which were taken from different sections of Qwest's Private Line and Advanced Communications tariffs regarding restoration of service after certain disaster scenarios.

Q. HOW DO THOSE TERMS REGARDING RESTORATION OF SERVICE RELATE TO EXPEDITING OF SERVICE ORDERS?

A. They don't. Eschelon pointed to the language of the Private Line and Advanced Communications tariffs regarding restoration of service, as a purported difference between retail and CLECs, but there is no relationship between restoration of service, and the order expedite process that Eschelon is disputing. The restoration of service section of the tariff specifically states how Qwest treats its customers in Arizona if the building an end user resides in is destroyed by fire, flood or an Act of God. If a customer needs to restore service at the original location when it is re-entering the original facility, after a fire, flood or Act of God

disaster, then Qwest restores the service at no charge. This is done through a repair ticket as no service order was issued to disconnect the service at the existing location. An expedited service order does not even come into play in this situation. The tariff then goes on to state that if the end user elects to move service to a temporary location (either within the same building, or a different building) that non-recurring charges would apply. This would include the non recurring charge to expedite a design service. However, when the customer moves its service, via a service order, back to the original premise location, if it meets the criteria as outlined in 3.2.2.d included below, the non-recurring charges would be waived (including the expedite fee).

3.2 TYPES OF RATES AND CHARGES
3.2.2 NONRECURRING CHARGES (CONT'D)

J. Reestablishment of Service Following Fire, Flood or Other Occurrence

1. Nonrecurring Charges Do Not Apply

Charges do not apply for the reestablishment of service following a fire, flood or other occurrence attributed to an Act of God provided that:

a. The service is of the same type as was provided prior to the fire, flood or other occurrence.

b. The service is for the same customer.

c. The service is at the same location on the same premises.

d. The reestablishment of service begins within 60 days after Company service is available. (The 60 day period may be extended a reasonable period if the renovation of the original location on the premises affected is not practical within the allotted time period).

2. Nonrecurring Charges Apply

Nonrecurring charges apply for establishing service at a different location on the same premises or at a different premises pending reestablishment of service at the original location.

Q. WHAT POST-DISASTER RESTORATION TERMS DOES QWEST APPLY TO CLECS?

A. Qwest provides the same restoration terms to CLECs as to Qwest's retail customers.

Q. THEN, DOES QWEST DISCRIMINATE AGAINST CLECs ON RESTORATION OF SERVICE?

A. No. Qwest provides the same terms of restoration to CLECs, including Eschelon, as it does to retail customers. Eschelon's claim of discrimination is simply not true.

Q. DOES QWEST DISCRIMINATE AGAINST CLECS ON PROVISIONING OF UNBUNDLED LOOPS?

A. No. In fact, Eschelon is actually able to obtain high capacity loops from Qwest at rates, terms and conditions that are superior to what Qwest provides to itself. Qwest's standard provisioning interval for DS1 is 9 days. In stark contrast, CLECs – including Eschelon can obtain a DS1 Capable loop in 5 days. Thus, if a wholesale customer orders a DS1 capable loop from Eschelon and wants the line delivered in one day, the order will have to be expedited 5 days, and it would cost the customer $1000 ($200 per day for 5 days). However, if the same customer comes to Qwest and orders a DS1 private line and wants the line delivered in one day, the order will have to be expedited 9 days, and it would cost the customer $1800 ($200 per day for 9 days). Thus, Eschelon is actually receiving superior rates and conditions. In my Affidavit submitted in support of Qwest's Response to Eschelon's Motion for Summary Judgment, I also pointed out that Eschelon has admitted this fact by stating in that Motion that it paid $1800 to expedite its customer's order.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, at this time.

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM MUNDELL
Commissioner
MIKE GLEASON
Commissioner
KRISTIN MAYES
Commissioner
BARRY WONG
Commissioner

IN THE MATTER OF THE COMPLAINT OF ESCHELON TELECOM OF ARIZONA, INC. AGAINST QWEST CORPORATION	DOCKET NO. T-03406A-06-0257 DOCKET NO. T-01051B-06-0257

EXHIBITS

OF

JILL MARTAIN

ON BEHALF OF

QWEST CORPORATION

AUGUST 28, 2006

Arizona Corporation Commission
Docket No. T-03406A-06-0257
Docket No. T-01051B-06-0257
Qwest Corporation – JM-1
Exhibits of Jill Martain

EXHIBIT JM-1

BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
CHAIRMAN
WILLIAM A. MUNDELL
COMMISSIONER
JEFF HATCH-MILLER
COMMISSIONER
MIKE GLEASON
COMMISSIONER
KRISTIN K. MAYES
COMMISSIONER

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 **QWEST'S QUARTERLY REPORT REGARDING ITS CHANGE MANAGEMENT PROCESS**

Qwest Corporation ("Qwest") submits this Quarterly Report regarding its Change Management Process pursuant to the Arizona Corporation Commission's ("ACC") Order[1] relating to Qwest's Operational Support Systems ("OSS"), which, among other things, adopted certain reporting recommendations in Staff's Supplemental Report on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements (UNEs), Change Management Process and Stand-Alone Test Environment, dated May 7, 2002 ("Staff's CMP Report"), at pp. 14-15.

In Staff's CMP Report, Staff recommended that Qwest develop a report on the effectiveness of the Re-Designed Change Management Process, to be filed with the ACC on a quarterly basis.[2] In accordance with that recommendation, Qwest began submitting quarterly CMP reports in August 2002, beginning with data for the second calendar quarter of 2002. The

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[1] Decision No. 66224, ACC Order, *In the Matter of US WEST Communication, Inc.'s Compliance with §271 of the Telecommunications Act of 1996*, at ¶¶72, 151, and ordering paragraphs (August 28, 2003) ("OSS Order").

[2] Staff's CMP Report at 15.

Commission adopted Staff's reporting recommendation in its OSS Order.[3] Qwest submits this report regarding events that occurred during July through September 2003 ("3Q2003") in accordance with the Commission's Order.

The information outlined by Staff in its recommendation is included in Exhibits A through D to this report, along with additional relevant information, as described below.

Exhibit A, entitled Qwest Wholesale Change Management Process: CLEC and Qwest Change Requests Submitted July 1, 2003 -- September 30, 2003, sets forth a listing of the number of CLEC and Qwest originated systems and product/process Change Requests ("CRs"), along with percentage of the total CRs submitted during the quarter by CLECs and Qwest, and a listing of all of the CRs submitted during the quarter, including the date on which the change was submitted, CR number, summary of the change requested, and the party that submitted the change.[4]

During 3Q2003, CLECs submitted 15 systems CRs, which constituted 75% of the total number of systems CRs, and 17 product/process CRs, which constituted 63% of the product/process CRs. Qwest submitted 5 systems CRs, which constituted 25% of the total number of systems CRs, and 10 product/process CRs, which constituted 37% of the product/process CRs.[5]

Exhibit B, entitled Qwest Wholesale Change Management Process: Status and Disposition of Changes, sets forth a summary of the current status or disposition of all systems and

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[3] OSS Order, at ¶¶72, 151, and ordering paragraphs (August 28, 2003).

[4] Further information regarding each CR can be found using the Product/Process Interactive Reports and Systems Interactive Reports on Qwest's wholesale web site. Links to those reports can be found at the following URL: www.qwest.com/wholesale/changerequest.html

[5] Section 5.4 of Qwest's Wholesale Change Management Process Document ("Wholesale CMP") provides that Qwest must submit CRs for Level 4 product/process changes. While Qwest does not submit CRs to initiate Level 0-3 product/process changes, information regarding those changes is included in Exhibit A.

product/process changes. These changes are listed in the following order:

- CLEC Systems Change Requests
- CLEC Product/Process Change Requests
- Qwest Systems Change Requests
- Qwest Product/Process Change Requests and Changes

Within the listing of Qwest Product/Process Change Requests and Changes, Qwest Level 4 changes (which require a CR) are listed first, followed by an aggregate listing Level 1-3 changes.[6] For each change listed, Exhibit B contains the date on which the change was submitted, the type of change or CR number, a summary of the change, the status and proposed effective date, if applicable, and the party that submitted the change.

Exhibit C, entitled Qwest Wholesale Change Management Process: Summary of Changes by Interface Release, sets forth information regarding interface changes that were implemented during 3Q2003.

Exhibit D contains two tables, entitled Qwest Wholesale Change Management Process: Escalation Process and Qwest Wholesale Change Management Process: Dispute Resolution Process, which set forth the escalations and dispute resolutions initiated from July 1, 2003 through September 30, 2003. These tables list the issues escalated and those taken to dispute resolution, along with the resolution reached.

Finally, Qwest has also attached as Exhibit E an updated matrix that catalogues Qwest's compliance with each of the sections of Qwest's Wholesale CMP[7] to provide additional data regarding the effectiveness of the CMP. The matrix shows that the core provisions of the redesigned process have been in effect for a year now and lists the timeframes and Qwest

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[6] Level 0 changes are defined as those that do not change the meaning of documentation, do not alter CLEC operating procedures, and are effective immediately without notice. Because these changes do not require any notification, web change form, or history log, they are not tracked and are not reported here.
[7] The current version of Qwest's Wholesale CMP can be found on the "What is CMP?" page of Qwest's wholesale web site at http://www.qwest.com/wholesale/cmp/whatiscmp.html

deliverables in the Wholesale CMP -- each of which was defined and agreed to through the redesign process -- along with specific information detailing Qwest's record of compliance with those obligations. Qwest's compliance rate continues to exceed 99%.

RESPECTFULLY SUBMITTED this 31st day of October, 2003.

FENNEMORE CRAIG

By: _____

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1478183.1/67817.150

EXHIBIT

A

[illegible] Change Requests Submitted July 1-September 30, 2003

	CLECs	Qwest
Number of Systems CRs:	15	5
Percentage of total Systems CRs:	**75%**	**25%**
Number of Product/Process CRs:	17	10
Percentage of total Product/Process CRs:	**63%**	**37%**

Date submitted	Change Request number	Summary of change	Submitter
7/1/03	SCR070103-01	Allow financial suspend orders to flow through for WA, OR, and ID-N. In addition, process two-way suspensions consistenty across Qwest 14 state footprint.	MCI
7/2/03	SCR070203-01	CABS Billing for Line Splitting	AT&T
7/10/03	SCR071003-01	ASCII invoice delivered in XML or CSV file formats	Qwest Communications
7/16/03	SCR051403-01X	Sync Test for Line share and Line Splitting on Maintenance Trouble Tickets and Sync Testing for provisioning of Line Splitting	Covad
7/16/03	SCR071603-01	Virtual Customer Service Record for Resale POTS and UNE-P Services	Qwest Communications
7/16/03	SCR071603-02	Bordertown Change to Billing Files	McLeodUSA
7/23/03	SCR072303-01	Request for 2 way blocking restriction	AT&T
7/30/03	SCR073003-01	IMA Add New IMA Reject Reason, "Requested Product Not Available"	Qwest Communications
7/31/03	SCR073103-01	Modify the Alphanumeric Indicator (ALI) code field on the Directory Listing Form to allow 6 characters	Qwest Communications
7/31/03	SCR073103-02	Remove Requirement for feature and feature detail information when LNA=D	MCI
8/1/03	SCR080103-01	Billmate/Paper bill Trunk and Facility Link Request	McLeodUSA

Date submitted	Change Request number	Summary of change	Submitter
8/12/03	SCR081203-01	Resale Page Conditional	McLeodUSA
8/13/03	SCR081303-01	Create Interactive CEMR User Guide	Qwest Communications
8/18/03	SCR081803-01	Seeking Ability To Migrate UNE-P Customer As End-State	AT&T
9/5/03	SCR090503-01	CEMR updates to allow interaction with Qwest CR SCR071603-01 titled Virtual Customer Service Record for Resale POTS and UNE-P Services	Eschelon
9/23/03	SCR092303-01EX	12.0 Sunset Extension	Eschelon
9/23/03	SCR092303-02	Qwest to Remove 10 Page Limitation to View History of Ticket in CEMR	Eschelon
9/25/03	SCR092503-02	Synch-up Address Information Housed in PREMIS and CRIS	MCI
9/25/03	SCR092503-03	Request to Change CCNA (RSID) in SATE Test Environment	AT&T
9/30/03	SCR093003-01	Allow LNP orders to be processed by TN and SANO for ACT= V and Z	Comcast
[illegible]			
Date submitted	Type of Change/CR Number	Summary of change	Submitter
7/1/03	PC070103-1	Provide "Lines In Service Report" to CLECs	MCI
7/1/03	PC070103-2	Processing of EAS (Extended Area Service)-Generated TGSRs (Trunk Group Service Requests)	Qwest Communications
7/1/03	PC070103-3	DSL Volume provider and data migration process to prevent extended DSL outage	Eschelon
7/2/03	PC061803-1	UNE P to UNE L Bulk Conversion	AT&T
7/2/03	PC070203-1	Process for Requesting Clarification to a Systems Document	Qwest Communications
7/2/03	PC070203-2	Introduce new form for MTE access.	Qwest Communications
7/11/03	PC071103-1	Histogram of cleared troubles UNE-P New Circuit Failure	AT&T
7/14/03	PC071403-1	Good Faith Estimate of Construction Charges	Covad
7/21/03	PC072103-1	DLR Option Change	Qwest Communications
7/22/03	PC072203-1	Extend length of time CLEC's have to respond on Jeop Notices	Electric Light Wave
7/22/03	PC072203-2	Expand PTA, Auto Acceptance, for all UNE Loop and EEL/LMC Products	Electric Light Wave

Date submitted	Change Request number	Summary of change	Submitter
7/23/03	PC072303-1	Customer Not Ready ("CNR") jeopardy notice should not be sent by Qwest to CLECs before 5 PM local time on the due date (for basic install)	Eschelon
7/23/03	PC072303-2	Add circuit numbers on invoices for ITP DSO Physical Co-lo	LTDS
7/30/03	PC073003-1	Qwest to provide test plans and results prior to deployment of IMA	MCI
8/1/03	PC111902-02X	Eliminate submission of service order completion notifications (SOCs) when provisioning of services have not yet occurred	MCI
8/5/03	PC080503-1CM	Change to the CMP Document Section 5.1.4 & Section 10.3.1	Qwest Communications
8/5/03	PC080503-2CM	Change to the CMP Document Section 10.4	Qwest Communications
8/6/03	PC080603-1	Metropolitan Optical Ethernet.	Qwest Communications
8/14/03	PC081403-1	Delayed order process modified to allow the CLEC a designated time frame to respond to a released delayed order after Qwest sends an updated FOC.	Eschelon
8/14/03	PC081403-2	Workback process/products expanded to include additional products and allow partial workbacks. Qwest will post the process and products included in the Business Procedure section of the web site.	Eschelon
8/19/03	PC081903-1	Change in Resale, UNE and Interconnection Services Service Interval Guide (SIG)	Qwest Communications
8/27/03	PC082703-1	Qwest to form CEMR User group	Eschelon
8/29/03	PC041503-1CM	Add to section 4.0 TYPES OF CHANGE CLEC Impacting defect	MCI
9/2/03	PC090203-1	Define criteria for use of CFLAG/PIA field	Qwest Communications
9/3/03	PC090303-1	Grandparenting of specific LAN Switching Service (LSS) USOCs	Qwest Communications
9/22/03	PC092203-1	UNE-P migration testing	AT&T
9/25/03	PC092503-1	Provide PREMIS zip code extensions, delineate fields and exclude unnecessary information for the states of MT and WY as a means to obtain rate zone information.	MCI

EXHIBIT B

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
7/1/03	SCR070103-01	Allow financial suspend orders to flow through for WA, OR, and ID-N. In addition, process two-way suspensions consistenty across Qwest 14 state footprint.	Denied	MCI
7/2/03	SCR070203-01	CABS Billing for Line Splitting	Withdrawn	AT&T
7/16/03	SCR051403-01X	Sync Test for Line share and Line Splitting on Maintenance Trouble Tickets and Sync Testing for provisioning of Line Splitting	CLEC Test	Covad
7/16/03	SCR071603-02	Bordertown Change to Billing Files	Presented	McLeodUSA
7/23/03	SCR072303-01	Request for 2 way blocking restriction	Denied	AT&T
7/31/03	SCR073103-02	Remove Requirement for feature and feature detail information when LNA=D	Prioritized	MCI
8/1/03	SCR080103-01	Billmate/Paper bill Trunk and Facility Link Request	Evaluation	McLeodUSA
8/12/03	SCR081203-01	Resale Page Conditional	Closed	McLeodUSA
8/18/03	SCR081803-01	Seeking Ability To Migrate UNE-P Customer As End-State	Presented	AT&T
9/5/03	SCR090503-01	CEMR updates to allow interaction with Qwest CR SCR071603-01 titled Virtual Customer Service Record for Resale POTS and UNE-P Services	Clarification	Eschelon
9/23/03	SCR092303-01EX	12.0 Sunset Extension	Submitted	Eschelon
9/23/03	SCR092303-02	Qwest to Remove 10 Page Limitation to View History of Ticket in CEMR	Submitted	Eschelon
9/25/03	SCR092503-02	Synch-up Address Information Housed in PREMIS and CRIS	Submitted	MCI
9/25/03	SCR092503-03	Request to Change CCNA (RSID) in SATE Test Environment	Submitted	AT&T
9/30/03	SCR093003-01	Allow LNP orders to be processed by TN and SANO for ACT=V and Z	Submitted	Comcast

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
7/1/03	PC070103-3	DSL Volume provider and data migration process to prevent extended DSL outage	Evaluation	Eschelon
7/1/03	PC070103-1	Provide "Lines In Service Report" to CLECs	Development	MCI
7/2/03	PC061803-1	UNE P to UNE L Bulk Conversion	Denied	AT&T
7/11/03	PC071103-1	Histogram of cleared troubles UNE-P New Circuit Failure	Withdrawn	AT&T

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
7/14/03	PC071403-1	Good Faith Estimate of Construction Charges	Evaluation	Covad
7/22/03	PC072203-2	Expand PTA, Auto Acceptance, for all UNE Loop and EEL/LMC Products	Evaluation	Electric Light Wave
7/22/03	PC072203-1	Extend length of time CLECs have to respond on loop Notices	Evaluation	Electric Light Wave
7/23/03	PC072303-1	Customer Not Ready ("CNR") jeopardy notice should not be sent by Qwest to CLECs before 5 PM local time on the due date (for basic install)	Development	Eschelon
7/23/03	PC072303-2	Add circuit numbers on invoices for ITP DSO Physical Co-lo	Withdrawn	LTDS
7/30/03	PC073003-1	Qwest to provide test plans and results prior to deployment of IMA	Evaluation	MCI
8/1/03	PC111902-02X	Eliminate submission of service order completion notifications (SOCs) when provisioning of services have not yet occurred	Closed	MCI
8/14/03	PC081403-1	Delayed order process modified to allow the CLEC a designated time frame to respond to a released delayed order after Qwest sends an updated FOC.	Presented	Eschelon
8/14/03	PC081403-2	Workback process/products expanded to include additional products and allow partial workbacks. Qwest will post the process and products included in the Business Procedure section of the web site.	Presented	Eschelon
8/27/03	PC082703-1	Qwest to form CEMR User group	Presented	Eschelon
8/29/03	PC041503-1CM	Add to section 4.0 TYPES OF CHANGE CLEC impacting defect	Completed	MCI
9/22/03	PC092203-1	UNE-P migration testing	Submitted	AT&T
9/25/03	PC092503-1	Provide PREMIS zip code extensions, delineate fields and exclude unnecessary information for the states of MT and WY as a means to obtain rate zone information.	Submitted	MCI

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
7/10/03	SCR071003-01	ASCII Invoice delivered in XML or CSV file formats	Development	Qwest Communications
7/16/03	SCR071603-01	Virtual Customer Service Record for Resale POTS and UNE-P Services	Prioritized	Qwest Communications
7/30/03	SCR073003-01	IMA Add New IMA Reject Reason, "Requested Product Not Available"	Withdrawn	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
7/31/03	SCR073103-01	Modify the Alphanumeric Indicator (ALI) code field on the Directory Listing Form to allow 6 characters	Prioritized	Qwest Communications
8/13/03	SCR081303-01	Create Interactive CEMR User Guide	Development	Qwest Communications
[illegible]				
Date Submitted	**CR Number (Level 4 changes)**	**Summary of change**	**Status*/proposed effective date**	**Submitter**
7/1/03	PC070103-2	Processing of EAS (Extended Area Service)-Generated TGSRs (Trunk Group Service Requests)	Development	Qwest Communications
7/2/03	PC070203-1	Process for Requesting Clarification to a Systems Document	CLEC Test	Qwest Communications
7/2/03	PC070203-2	Introduce new form for MTE access.	Development	Qwest Communications
7/21/03	PC072103-1	DLR Option Change	Withdrawn	Qwest Communications
8/5/03	PC080503-2CM	Change to the CMP Document Section 10.4	Completed	Qwest Communications
8/5/03	PC080503-1CM	Change to the CMP Document Section 5.1.4 & Section 10.3.1	Completed	Qwest Communications
8/6/03	PC080603-1	Manual ordering process for Resale Metropolitan Optical Ethernet.	Development	Qwest Communications
8/19/03	PC081903-1	Change in Resale, UNE and Interconnection Services Service Interval Guide (SIG)	Withdrawn	Qwest Communications
9/2/03	PC090203-1	Define criteria for use of CFLAG/PIA field	Presented	Qwest Communications
9/3/03	PC090303-1	Grandparenting of specific LAN Switching Service (LSS) USOCs	Presented	Qwest Communications
Date Submitted	**Type of Change/CR Number**	**Summary of change**	**Status*/proposed effective date**	**Submitter**
Date Submitted	**Level of Change**	**Summary of change**	**Status*/proposed effective date**	**Submitter**

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
6/3/03	Level 3	CMP – FINAL NOTICE Unbundled Network Elements - Platform (UNE-P) General Information - V32.0 and Unbundled Network Elements (UNE) - Switching (UBS) - V21.0	7/18/03	Qwest Communications
6/3/03	Level 4	CMP - Access to Poles, Ducts and Rights of Ways - V15.0	7/18/03	Qwest Communications
6/13/03	Level 3	CMP – FINAL NOTICE Fraud Protection - V5.0	7/28/03	Qwest Communications
6/17/03	Level 3	CMP – FINAL NOTICE Interconnection and Collocation for Transport and Switched Unbundled Network Elements and Finished Services – Technical Publication 77386, Issue I	8/1/03	Qwest Communications
6/17/03	Level 3	CMP – FINAL NOTICE Unbundled Dedicated Interoffice Transport (UDIT), Technical Publication 77389, Issue G	8/5/03	Qwest Communications
6/17/03	Level 3	CMP – FINAL NOTICE - Unbundled Dedicated Interoffice Transport (UDIT) - V16.0	8/1/03	Qwest Communications
6/23/03	Level 3	CMP – FINAL NOTICE Wholesale Customer Contacts V17.0	8/7/03	Qwest Communications
6/23/03	Level 3	CMP – FINAL NOTICE Unbundled Local Loop -2-Wire 4-Wire Non-Loaded Loop - V9.0 and Unbundled Local Loop - General Information - V33.0	8/7/03	Qwest Communications
6/24/03	Level 2	CMP – FINAL NOTICE and Qwest Response to CLEC Comments on Collocation – General Information V12.0	7/15/03	Qwest Communications
6/24/03	Level 3	CMP – FINAL NOTICE Qwest VMS with UNE-P	7/25/03	Qwest Communications
6/25/03	Level 4	CMP – FINAL NOTICE -CustomChoice for Business Package V5.0 -CustomChoice Packages - Residence V6.0 -CustomChoice - Complete Packages V7.0 -PopularChoice Packages V5.0 -PreferredChoice Packages V3.0 -ValueChoice Packages V6.0	8/9/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
6/27/03	Level 2	CMP - FINAL NOTICE and Qwest Response to CLEC Comments on: -Business Voice Messaging Service Choice-V6.0 -Message Waiting Indication-Business-V7.0 -Message Waiting Indication - Residence-V6.0 -Qwest Voice Messaging Service - Residence Only-V7.0	7/18/03	Qwest Communications
6/27/03	Level 3	CMP – FINAL NOTICE Feature Template Update	8/11/03	Qwest Communications
7/3/03	Level 2	CMP - Local Service Ordering Guidelines (LSOG): Centrex Resale Service (CRS) V18.0, Completion Notification (CN) V9.0, Customer Service Record Inquiry (CSR) V12.0, Directory Listing (DL) V27.0, End User (EU) V30.0, Hunt Group Information (HGI) V1.0, Listi	8/4/03	Qwest Communications
7/3/03	Level 2	CMP- FINAL NOTICE and Qwest Response to CLEC Comments on Local Service Ordering Guidelines (LSOG): Centrex Resale Service (CRS) V18.0, Completion Notification (CN) V9.0, Customer Service Record Inquiry (CSR) V12.0, Directory Listing (DL) V27.0, End User (	8/4/03	Qwest Communications
7/7/03	Level 1	CMP – Changes to the Qwest Change Management Process Document	7/7/03	Qwest Communications
7/8/03	Level 1	CMP - Forecasting V15.0	7/9/03	Qwest Communications
7/8/03	Level 4	CMP - CustomNet V5.0	8/15/03	Qwest
7/8/03	Level 4	CMP – FINAL NOTICE - CustomNet V5.0	8/15/03	Qwest Communications
7/9/03	Level 1	CMP - Local Number Portability V20.0, Single Location Routing Number V1.0	7/10/03	Qwest Communications
7/9/03	Level 2	CMP - Qwest Interconnect OSS Electronic Access V14	7/30/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
7/11/03	Level 1	CMP – Service Interval Guide for Resale, UNE and Interconnection Services (SIG) V20.0	7/11/03	Qwest Communications
7/11/03	Level 3	CMP - Caller ID - V5.0 and Anonymous Call Rejection - V4.0	8/18/03	Qwest Communications
7/11/03	Level 3	CMP - ValueChoice Packages V8.0	8/18/03	Qwest Communications
7/11/03	Level 3	CMP - Caller ID - V5.0 and Anonymous Call Rejection - V4.0	8/25/03	Qwest Communications
7/11/03	Level 3	CMP – FINAL NOTICE ValueChoice Packages V8.0	8/18/03	Qwest Communications
7/14/03	Level 3	CMP - Fraud Protection - V7.0	8/28/03	Qwest Communications
7/14/03	Level 3	CMP - FINAL NOTICE - Fraud Protection - V7.0	8/28/03	Qwest Communications
7/15/03	Level 1	CMP - Local Interconnection Service (LIS) V11.0	7/16/03	Qwest Communications
7/16/03	Level 1	CMP - Maintenance and Repair Overview - V15.0	7/17/03	Qwest Communications
7/17/03	Level 1	CMP – Change to CMP Interactive Report	7/17/03	Qwest Communications
7/17/03	Level 1	CMP - UNE-P DSS- V21.0 - Retract	7/18/03	Qwest Communications
7/18/03	Level 3	CMP - Centrex Management Systems (CMS)	9/1/03	Qwest Communications
7/18/03	Level 3	CMP – FINAL NOTICE- Centrex Management Systems (CMS)	9/1/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
7/21/03	Level 1	CMP - UNE-P POTS- V20.0	7/22/03	Qwest Communications
7/21/03	Level 1	CMP - Local Service Freeze V15.0, Provisions Available for Opt In V9.0	7/22/03	Qwest Communications
7/21/03	Level 1	CMP - Local Number Portability V21.0	7/22/03	Qwest Communications
7/22/03	Level 1	CMP -- Re-posting of Training Materials for IMA Release 13.0	7/22/03	Qwest Communications
7/23/03	Level 1	CMP - Access To Telephone Numbers V5.0 - Access to Emergency Services (911/E911) V13.0 - Customized Routing V11.0 - Intercept Services V2.0 - Operator Services V10.0 - Directory Assistance List (DAL) V7.0	7/24/03	Qwest Communications
7/23/03	Level 2	CMP - Local Number Portability V22.0	8/13/03	Qwest Communications
7/23/03	Level 2	CMP - Local Number Portability V22.0	8/13/03	Qwest Communications
7/28/03	Level 1	CMP - Line Information DataBase (LIDB) V3.0, Billing Information - Local Exchange Carrier Invoice System (LEXCIS) V2.0, Billing Information - Integrated Access Billing System (IABS) V10.0, Billing Information - Daily Usage File (DUF) V9.0, Billing Inform	7/29/03	Qwest Communications
7/28/03	Level 1	CMP - Modification to "Out of Capacity" algorithm for DSL	7/29/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
7/28/03	Level 2	CMP - Collocation - General Information V13.0 - Line Sharing/Shared Loop V14.0 - Line Splitting V13.0 - Adjacent Collocation V6.0 - Facility Connected (FC) Collocation V8.0 - Field Connection Point (FCP)/Cross-Connect Collocation V8.0 - Remote Collo	8/18/03	Qwest Communications
7/30/03	Level 2	CMP - Qwest Communications International, Inc. Contact List for Qwest & Competitive Local Exchange Carrier (CLEC) Escalation of Technical Issues (Version 7.0)	8/20/03	Qwest Communications
7/30/03	Level 2	CMP - Directory Assistance (DA) Service V10.0	8/20/03	Qwest Communications
7/31/03	Level 1	CMP – Accepting September Registrations / UBL & LNP date change	7/31/03	Qwest Communications
7/31/03	Level 1	CMP – Long Distance Carrier Selection Overview V5.0	8/1/03	Qwest Communications
7/31/03	Level 1	CMP – Resale – Customized Call Management Services (CCMS), Centraflex and Centron 1 V13.0 - Resale - Central Office-Automatic Call Distribution Service (CO-ACD) V4.0 - Resale – Asynchronous Transfer Mode (ATM) V13.0 - Resale - Direct Inward Dial	8/1/03	Qwest Communications
7/31/03	Level 1	CMP - Qwest Easy Access - V8.0	8/1/03	Qwest Communications
8/1/03	Level 1	CMP - UNE-P with Qwest DSL- V5.0, Resale- Qwest DSL - V8.0, Pre-Ordering Overview- V23.0	8/4/03	Qwest Communications
8/1/03	Level 1	CMP - Local Service Ordering Guidelines (LSOG) End User (EU) Field 57 - SSN	8/4/03	Qwest Communications
8/1/03	Level 1	CMP - Local Service Ordering Guidelines (LSOG): Firm Order Confirmation - Manual (FOC) V16.0, Resale Private Line (RPL) V24.0	8/4/03	Qwest Communications
8/1/03	Level 2	CMP - VMS with UNE-P V2.0	8/22/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
8/1/03	Level 2	CMP - VMS with UNE-P V2.0	8/22/03	Qwest Communications
8/4/03	Level 1	CMP - Migrations and Conversions Overview V7.0	8/5/03	Qwest Communications
8/4/03	Level 3	CMP – Unbundled Network Elements-Platform (UNE-P) - Integrated Services Digital Network (ISDN) - Primary Rate Interface (PRI) V23.0 – Unbundled Network Elements-Platform (UNE-P) Digital Switched Services (DSS) V21.0 – Resale - Integrated Services Dig	9/18/03	Qwest Communications
8/4/03	Level 3	CMP – FINAL NOTICE - Resale and UNE-P ISDN PRI, Resale and UNE-P DSS	9/18/03	Qwest Communications
8/5/03	Level 1	CMP - Maintenance and Repair Overview V16.0	8/6/03	Qwest Communications
8/6/03	Level 1	Re-posting of the job aid covering the use of the Held, Escalated, and Expedite Tool (HEET).	8/6/03	Qwest Communications
8/6/03	Level 1	CMP - Delivery Mechanism for Large Documents Through Qwest Mailout tool	8/6/03	Qwest Communications
8/6/03	Level 2	CMP - Ordering Overview V30.0	10/1/03	Qwest Communications
8/6/03	Level 2	CMP – FINAL NOTICE and Qwest Response to CLEC Comments on Ordering Overview V30.0	9/30/03	Qwest Communications
8/7/03	Level 1	CMP - LSOG6: Directory Listings (DL) V28.0	8/8/03	Qwest Communications
8/7/03	Level 1	CMP - Line Sharing/Shared Loop V13.0	8/8/03	Qwest Communications
8/7/03	Level 1	CMP - Resale - Competitive Response/Competitive Inquiry - V4.0	8/8/03	Qwest Communications
8/7/03	Level 1	CMP – Update to Existing Customer Web Based IMA Training Courses	8/8/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
8/7/03	Level 2	CMP - Billing Information - Customer Records and Information System (CRIS) V19.0	8/28/03	Qwest Communications
8/8/03	Level 1	CMP - External Documentation Request Process	8/11/03	Qwest Communications
8/8/03	Level 2	CMP - Service Interval Guide for Resale, UNE and Interconnection Services (SIG) V23.0	8/29/03	Qwest Communications
8/8/03	Level 2	CMP – FINAL NOTICE and Qwest Response to Comments on Service Interval Guide for Resale, UNE and Interconnection Services (SIG) V23.0	8/29/03	Qwest Communications
8/11/03	Level 1	CMP - Unbundled Local Loop - General Information - V34.0	8/12/03	Qwest Communications
8/11/03	Level 1	CMP - Wholesale Customer Contacts V18.0	8/12/03	Qwest Communications
8/12/03	Level 1	CMP - Pre-Ordering V24.0	8/13/03	Qwest Communications
8/12/03	Level 1	CMP - UNE-P General Information	8/13/03	Qwest Communications
8/12/03	Level 2	CMP - Performance Assurance Plan (QPAP) V4.0	9/3/03	Qwest Communications
8/13/03	Level 1	CMP - Loop Splitting V12.0	8/14/03	Qwest Communications
8/13/03	Level 1	CMP - Loop MUX Combination (LMC) V19.0, Enhanced Extended Loop (EEL) V22.0	8/14/03	Qwest Communications
8/13/03	Level 1	CMP - Sub - Loop V18.0	8/14/03	Qwest Communications
8/13/03	Level 1	CMP - Shared Distribution Loop V8.0	8/14/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
8/14/03	Level 1	CMP - Access to Poles,Ducts and Rights of Way - V16.0, Common Channel Signaling Access Capability (CCSAC)/Signaling System 7 (SS7) - Unbundled - V7.0, Network Interface Device (NID) - V5.0, Unbundled Local Loop - Asymmetric Digital Subscriber Line (ADSL)	8/15/03	Qwest Communications
8/14/03	Level 1	CMP -Resale - Frame Relay Service (FRS) - V10.0 -Resale - Private Line Transport (PLT) Digital Service Level 1 (DS1) - V6.0 -Resale - Private Line Transport (PLT) Digital Service Level 3 (DS3) V6.0 -Resale -- Qwest Inside Wire Maintenance (IWM	8/15/03	Qwest Communications
8/15/03	Level 1	CMP - Local Service Ordering Guidelines (LSOG):Centrex Resale Service (CRS) V19.0, Directory Listing (DL) V29.0, Local Response (LR) V22.0, Loop Service (LS) V19.0, Loop Service with Number Portability (LSNP) V17.0, Local Service Request (LSR) V36.0, Loca	8/18/03	Qwest Communications
8/15/03	Level 1	CMP - Service Interval Guide for Resale, UNE and Interconnection Services (SIG) V22.0	8/18/03	Qwest Communications
8/15/03	Level 2	CMP - Call Forwarding Decision Matrix for POTS-V1.0	9/5/03	Qwest Communications
8/15/03	Level 3	CMP - Resale and UNE-P ISDN PRI, Resale and UNE-P DSS, Resale UAS	9/30/03	Qwest Communications
8/15/03	Level 3	CMP - Resale General V27.0	9/29/03	Qwest Communications
8/15/03	Level 3	CMP -- FINAL NOTICE on Unbundled Network Elements-Platform (UNE-P) - Integrated Services Digital Network (ISDN) - Primary Rate Interface (PRI) V24.0 -- Unbundled Network Elements-Platform (UNE-P) - Digital Switched Services (DSS) V22.0 -- Resale - I	9/30/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
8/15/03	Level 3	CMP – FINAL NOTICE on Resale General V27.0	9/29/03	Qwest Communications
8/15/03	Level 4	CMP - Processing of Extended Area Service (EAS)	9/23/03	Qwest Communications
8/15/03	Level 4	CMP – FINAL NOTICE on Processing of Extended Area Service (EAS)	9/23/03	Qwest Communications
8/18/03	Level 3	CMP - Wholesale InterconnectionAgreements and Amendments - Amendments 10-2-03	10/2/03	Qwest Communications
8/18/03	Level 3	CMP – FINAL NOTICE on Wholesale InterconnectionAgreements and Amendments - Amendments 10-2-03	10/2/03	Qwest Communications
8/19/03	Level 1	CMP - Update Features	8/20/03	Qwest Communications
8/19/03	Level 1	CMP - Scan-Alert -V3.0	8/20/03	Qwest Communications
8/20/03	Level 1	CMP - Hunting Job Aid - V1.0	8/21/03	Qwest Communications
8/21/03	Level 1	CMP - Local Service Ordering Guidelines (LSOG): Local Service Ordering - Overview (OVR)	8/22/03	Qwest Communications
8/21/03	Level 1	CMP - Adjacent Collocation V7.0, Caged Physical Collocation V5.0, Cageless Physical Collocation V5.0, Collocation - General Information V14.0, Common Area Splitter Collocation V8.0, Facility Connected (FC) Collocation V9.0, Interconnection Distribution Fr	8/22/03	Qwest Communications
8/22/03	Level 1	CMP – POTS Classes in Denver / Local Number Portability Class on 9/11/03 in Minneapolis Cancelled for September	8/22/03	Qwest Communications
8/22/03	Level 1	CMP - Local Service Ordering Guidelines (LSOG):Centrex Resale Service (CRS) V20.0, Local Response (LR) V23.0, Loop Service with Number Portability (LSNP) V18.0, Port Service (PS) V14.0, Resale Service (RS) V28.0	8/25/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
8/22/03	Level 1	CMP - Collocation - General Information V15.0	8/25/03	Qwest . Communications
8/22/03	Level 1	CMP - Resale - General - V28.0	8/25/03	Qwest Communications
8/22/03	Level 1	CMP - Features Template Update	8/25/03	Qwest Communications
8/22/03	Level 2	CMP - Blocking Job Aid - V1.0	9/12/03	Qwest Communications
8/22/03	Level 3	CMP - UNE-P and Resale DSL	10/6/03	Qwest Communications
8/22/03	Level 3	CMP - UNE-P and Resale DSL	10/6/03	Qwest Communications
8/25/03	Level 1	CMP – LAN Switching Service – 77396 Issue G	8/26/03	Qwest Communications
8/25/03	Level 1	CMP - UNE-P PAL- V13.0	8/26/03	Qwest Communications
8/25/03	Level 2	CMP - Unbundled Local Loop - General Information - V35.0	9/15/03	Qwest Communications
8/25/03	Level 2	CMP - Unbundled Local Loop - General Information - V35.0	9/15/03	Qwest Communications
8/25/03	Level 4	CMP - Network Interface Device - V6.0	10/9/03	Qwest Communications
8/25/03	Level 4	CMP – FINAL NOTICE on Network Interface Device - V6.0	10/9/03	Qwest Communications
8/26/03	Level 1	CMP - Custom Ringing Service- V7.0	8/27/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
8/26/03	Level 3	CMP - Ordering Overview V31.0	10/1/03	Qwest Communications
8/26/03	Level 3	CMP – FINAL NOTICE and Qwest Response to CLEC Comments on Ordering Overview V31.0	10/1/03	Qwest Communications
8/27/03	Level 1	CMP -2-Wire Frame Relay Service (2-Wire FRS) 4.0 -Resale - Local Exchange Services - Business and Residence Plain Old Telephone Service (POTS) - V25.0 -Resale - Inside Wire and Jack(s) Installation Service - Minnesota and Oregon Only - V2.0 -Resal	8/28/03	Qwest Communications
8/27/03	Level 3	CMP – Changes to Interim Process Unbundled Local Loop-DS1 Capable Loop	10/11/03	Qwest Communications
8/29/03	Level 1	CMP – 4Q03 Course Offerings / IMA Hands On and CEMR Classes in Seattle Cancelled for September	8/29/03	Qwest Communications
8/29/03	Level 1	CMP – Process Option for Multiple Block Activities	8/29/03	Qwest Communications
8/29/03	Level 1	CMP - Local Service Ordering Guidelines (LSOG): Local Service Request (LSR) V37.0	9/2/03	Qwest Communications
8/29/03	Level 3	CMP - Ordering Overview V32.0	10/13/03	Qwest Communications
8/29/03	Level 3	CMP – FINAL NOTICE and Qwest Response to CLEC Comments on Ordering Overview V32.0	10/9/03	Qwest Communications
9/3/03	Level 2	CMP - Service Interval Guide for Resale, UNE and Interconnection Services (SIG) V24.0	9/24/03	Qwest Communications
9/4/03	Level 1	CMP - CustomNet V7.0	9/5/03	Qwest Communications
9/4/03	Level 1	CMP - Features Updates	9/5/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
9/4/03	Level 1	CMP - UNE-P and Resale DSL	9/5/03	Qwest Communications
9/5/03	Level 1	CMP - Changes to Interim Process Unbundled Local Loop-DS1 Capable Loop	9/5/03	Qwest Communications
9/5/03	Level 1	CMP - LMOS Disposition and Cause Codes	9/8/03	Qwest Communications
9/5/03	Level 2	CMP - Resale General and UNE-P General	9/30/03	Qwest Communications
9/5/03	Level 2	CMP – FINAL NOTICE and Qwest Response to CLEC Comments on Resale General – V29.0 and UNE-P General – V36.0	9/26/03	Qwest Communications
9/8/03	Level 1	CMP - Directory Assistance (DA) Service V11.0	9/9/03	Qwest Communications
9/8/03	Level 1	CMP - Operator Services V11.0	9/9/03	Qwest Communications
9/8/03	Level 1	CMP - Series Hunting - V7.0	9/8/03	Qwest Communications
9/8/03	Level 4	CMP - Collocation - General Information V17.0	10/23/03	Qwest Communications
9/8/03	Level 4	CMP - Collocation - General Information V17.0	10/23/03	Qwest Communications
9/9/03	Level 1	CMP - Centrex Resale Class Cancelled for September	9/9/03	Qwest Communications
9/9/03	Level 1	CMP - Resale - Synchronous Service Transport (SST) - V2.0 - Resale - Self-Healing Network Service (SHNS) – V4.0 - Resale Private Branch Exchange (PBX) Trunk Service - V16.0 - Resale - Private Line Transport (PLT) Digital Service Level 0 (DS0) Voice	9/10/03	Qwest Communications
9/9/03	Level 1	CMP - LSOG6: Directory Listings (DL) V30.0	9/10/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
9/9/03	Level 2	CMP - Call Forwarding - Busy Line/Alternate Answer V2.0 - Call Forwarding - Don't Answer/Alternate Answer - V3.0 - Call Forwarding Busy Line Don't Answer Intraoffice - V6.0 - Call Forwarding Busy Line/Don't Answer Expanded - V5.0	9/30/03	Qwest Communications
9/9/03	Level 2	CMP - Port In - V2.0	9/30/03	Qwest Communications
9/9/03	Level 2	CMP – FINAL NOTICE and Qwest Response to Comments -Call Forwarding - Busy Line/Alternate Answer V2.0 -Call Forwarding - Don't Answer/Alternate Answer - V3.0 -Call Forwarding Busy Line Don't Answer Intraoffice - V6.0 - Call Forwarding Busy Line/Don'	9/30/03	Qwest Communications
9/9/03	Level 2	CMP - Port In - V2.0	9/30/03	Qwest Communications
9/11/03	Level 1	CMP - Multi-Line Hunting -V6.0, Series Hunting - V8.0	9/11/03	Qwest Communications
9/11/03	Level 1	CMP - Long Distance Carrier Selection Overview V6.0	9/12/03	Qwest Communications
9/11/03	Level 1	CMP - Suspension of Service - V2.0	9/12/03	Qwest Communications
9/11/03	Level 1	CMP - Line Sharing/Shared Loop V16.0	9/12/03	Qwest Communications
9/11/03	Level 1	CMP - Billing Information - Taxes and Tax Exemption V6.0	9/12/03	Qwest Communications
9/11/03	Level 2	CMP - Collocation - General Information V16.0, Virtual Collocation V8.0	10/2/03	Qwest Communications
9/12/03	Level 1	CMP - Local Service Ordering Guidelines (LSOG): End User (EU) V31.0, Local Service Request (LSR) V38.0, Loop Service (LS) V20.0, Pre-Order (POP) V23.0, Resale Services (RS) V29.0	9/15/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
9/12/03	Level 3	CMP - Maintenance and Repair Overview V17.0	10/27/03	Qwest Communications
9/12/03	Level 3	CMP - Maintenance and Repair Overview V17.0	10/16/03	Qwest Communications
9/15/03	Level 3	CMP – Changes to Process Unbundled Local Loop-DS1 Capable Loop	10/30/03	Qwest Communications
9/16/03	Level 1	CMP - External Documentation Request Process	9/17/03	Qwest Communications
9/16/03	Level 3	CMP - Message Waiting Indication Bus- V9.0 and Message Waiting Indication -Res V8.0	10/31/03	Qwest Communications
9/16/03	Level 3	CMP - Message Waiting Indication Bus- V9.0 and Message Waiting Indication -Res V8.0	10/31/03	Qwest Communications
9/17/03	Level 1	CMP - Retract UNE-P with Qwest DSL V7.0 and Resale Qwest DSL 10.0	9/17/03	Qwest Communications
9/17/03	Level 1	CMP - Proof of Authorization/Letter of Agency V4.0	9/18/03	Qwest Communications
9/17/03	Level 1	CMP - Forecasting V16.0, Jointly Provided Access Service V4.0, Local Interconnection Service (LIS) V12.0, QSearch Service V6.0, Temporary Disconnection for Non-Payment/Restore V2.0, White Page Directory Listings V18.0	9/18/03	Qwest Communications
9/17/03	Level 2	CMP - Directory Listing Inquiry System (DLIS) User Guide	10/8/03	Qwest Communications
9/17/03	Level 2	CMP - Directory Listing Inquiry System (DLIS) User Guide	10/8/03	Qwest Communications
9/18/03	Level 1	CMP - Port Within V2.0 and Interim Number Portability (INP) V5.0	9/19/03	Qwest Communications
9/18/03	Level 1	CMP - Changes to Process-Unbundled Local Loop-DS1 Capable Loop - Revision 5	9/18/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
9/19/03	Level 3	CMP - UNE-P General Information-V37.0 and Qwest VMS with UNE-P - V3.0	11/3/03	Qwest Communications
9/22/03	Level 1	CMP - Billing Information - Customer Records and Information System (CRIS) V20.0	9/23/03	Qwest Communications
9/22/03	Level 1	CMP - Resale - Integrated services Digital Network (ISDN) Primary Rate Interface (PRI) - V17.0 -Resale Public Access Lines (PAL) Service - V13.0	9/23/03	Qwest Communications
9/22/03	Level 4	CMP - Qwest Metro Optical Ethernet – Technical Publication 77411, Issue A	11/6/03	Qwest Communications
9/22/03	Level 4	CMP - Qwest Metro Optical Ethernet – Technical Publication 77411, Issue A	11/6/03	Qwest Communications
9/22/03	Level 4	CMP - Qwest Metro Optical Ethernet – Technical Publication 77411, Issue A	11/18/03	Qwest Communications
9/23/03	Level 1	CMP - Features Template Update	9/24/03	Qwest Communications
9/24/03	Level 1	CMP - IMA Facility Based Directory Listing Class Cancelled for October	9/24/03	Qwest Communications
9/24/03	Level 1	CMP - Notification of adjusted notice level for -UNE-P General Information - V37.0 and Qwest VMS with UNE-P - V3.0	9/25/03	Qwest Communications
9/24/03	Level 2	CMP - Directory Assistance List (DAL) V8.0	10/15/03	Qwest Communications
9/26/03	Level 1	CMP - Long Distance Carrier Selection Overview V7.0	9/29/03	Qwest Communications
9/26/03	Level 1	CMP - Facility-Based CLECs and Reseller/Unbundled Network CLECs Directory Listing User Document	9/29/03	Qwest Communications
9/26/03	Level 2	CMP - Re-notification: Local Service Ordering Guidelines (LSOG): End User (EU) V31.0, Number Portability (NP) V14.0	10/18/03	Qwest Communications

Date Submitted	Type of Change/CR Number	Summary of change	Status*/proposed effective date	Submitter
9/29/03	Level 1	CMP – Corrected URL for Qwest Response to comments on PROS.08.27.03.F.01173.DS1CapableLoop_IntProc	9/29/03	Qwest Communications
9/29/03	Level 3	CMP - Resale - Integrated Services Digital Network (ISDN) Primary Rate Interface (PRI) - V18.0 -Unbundled Network Elements - Platform (UNE-P) - Integrated Services Digital Nettwork (ISDN) Primary Rate Interface (PRI)- V25.0	11/13/03	Qwest Communications
9/29/03	Level 3	CMP - Resale - Integrated Services Digital Network (ISDN) Primary Rate Interface (PRI) - V18.0 -Unbundled Network Elements - Platform (UNE-P) - Integrated Services Digital Nettwork (ISDN) Primary Rate Interface (PRI)- V25.0	11/13/03	Qwest Communications
9/30/03	Level 1	CMP - Accepting November Registrations / IMA FBDL Class Offering in Minneapolis	9/30/03	Qwest Communications
9/30/03	Level 1	CMP - Unbundled Local Loop - General Information V36.0	10/1/03	Qwest Communications
9/30/03	Level 3	CMP - Intercept Services V3.0	11/14/03	Qwest Communications

EXHIBIT C

	Number
	0
	0

Change Request number	Summary	Submitter

	Number
	0
	3

Change Request number	Summary	Submitter
SCR040303-02IG	Exact Upgrade - ASOG 27	Qwest Communications
SCR062802-03	Direct Connect (NDM) ASR Validation	Qwest Communications
SCR040303-01IG	ASR 27 - TELIS Upgrade	Qwest Communications

	Number
	12
	4

Change Request number	Summary	Submitter
SCR052902-03RG	REGULATORY CR- Wireless to Wireline Local Number Portability	Qwest Communications
SCR120301-1	IMA flow through for Centrex 21 orders	Eschelon
SCR093002-03	Update IMA to reflect all switches in a multiple switch Central Office when doing an address validation.	Eschelon
SCR062702-09	Remove FID accuracy edit in IMA when the value is "C" or "D" in the FA field for a USOC.	Eschelon
25091	DSL Flowthrough	Qwest Communications
SCR093002-04	Update PSON to include all service order information including listing, billing and service address	Eschelon
SCR032602-1	Provide CSR recap functionality in IMA when a request type of "P" is selected.	Eschelon
SCR111902-01	Eliminate requirement to provide (FA=C) change history on maintenance of features with FID and FID Detail.	WorldCom
SCR013102-08	LOSG 6 - Issue 1790: Remove Hunt Group Information from the LSR practice and create a new Hunt Group Information practice	Qwest Communications
SCR091302-01	Pre Order Address Validation by Working Telephone Number	WorldCom

SCR111102-02	Abbreviated ordering information for UNE DSL	Covad
SCR100102-02	Enhancement to the Qwest CSI/CSR Transaction Capabilities	WorldCom
SCR032702-01	Add recap function to Centrex forms	NT&T
SCR013102-01	LSOG 6 - Multiple Issues (1963/2090/2092/2247/2250): Add LSOG LR Form Functionality	Qwest Communications
SCR101802-02	Ability to submit Line sharing, Line Splitting and Loop Splitting LSR's with TN only.(Omit address)	Covad

[redacted]

	[redacted]
[redacted]	0
[redacted]	0

Change Request number	Summary	Submitter

[redacted]

	[redacted]
[redacted]	2
[redacted]	2

Change Request number	Summary	Submitter
SCR012103-02	CABS/BOS IABS Updates: Perform all standard CABS BOS edits on the UNE bills	AT&T
SCR012103-01	CABS/BOS IABS Updates: Process Bill Data and CSRs on the same day	AT&T
SCR051203-02IG	Allow a maximum of 99,999 records in 20-20-09/10 packs transmitted over CMDS	Qwest
SCR101802-01IG	Add 'Send to OCN' info to 110XXX EMI Records	Qwest

[redacted]

	[redacted]
[redacted]	0
[redacted]	0

Change Request number	Summary	Submitter

EXHIBIT D

Date submitted	Escalation number	Summary of escalation	Submitter
9/2/03	TT242666 - E18	Qwest Response to TT 242666	MCI

Note: Escalation detail is available at http://www.qwest.com/wholesale/cmp/escalations.html

Date submitted	D R number	Summary of change	Submitter

Note: No Disputes were received during July 1 -September 30, 2003

EXHIBIT E

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 1 Introduction and Scope Qwest implemented Section 1 as agreed to by the Redesign Team.	October 2, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting October 2-3 Final Minutes, page 4 paragraph 1.)	October 3, 2001	Qwest has complied with this process for over 23 months. Qwest processed -394 new OSS Interface CRs between October 3, 2001 and September 30, 2003. Qwest processed 183 new Product Process CRs between October 3, 2001 and September 30, 2003. Qwest has rejected only 4 Process CR on the grounds that they were deemed to be out of scope of the Change Management Process.	Supporting data can be found at the following URL: http://www.qwest.com/wholesale/cmp/changerequest.html (Select either CLEC-Qwest Change Request – Product/Process Interactive Reports or CLEC-Qwest Change Request – Systems Interactive Reports.)

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 2 **Managing the Change Management Process** Qwest implemented Section 2 as agreed to by the Redesign Team.	Varies by sub-section.	Qwest implemented Section 2 as specified in the Qwest's Record of Compliance column.	Qwest has modified the processes, as necessary, as determined by the Redesign Team. Qwest posts a POC list to the CMP web site. CMP Managers have been in place since the inception of CMP in 1999. CR Project Managers have been in place (fulfilling the roles and responsibilities described in the CMP) since August, 2001. Escalation/Dispute Resolution Managers have been in place (fulfilling the roles and responsibilities described in the CMP) since September, 2001. Qwest posted a CLEC comments tool to the CMP web site. In April 2002, CLECs and Qwest agreed to procedures to manage changes to the CMP. In June 2002, CLECs and Qwest agreed to use a CR to manage changes.	Supporting data can be found at the following URLS: http://www.qwest.com/wholesale/cmp/poc.html (CLEC-Qwest POC List) http://www.qwest.com/wholesale/cmp/changerequest.html (See either CLEC-Qwest Change Request – Product/Process Interactive Reports or CLEC-Qwest Change Request – Systems Interactive Reports These contain the names of the CR Project Managers assigned to each of the CRs.) http://www.qwest.com/wholesale/cmp/escdisp.html (See actual escalations.) http://www.qwest.com/wholesale/cmp/review.html (This is the tool the CLECs use to submit comments on a given PCAT or TechPub.)

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 3 Meetings Qwest implemented Section 3 as agreed to by the Redesign Team.	August 8, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://qwest.com/wholesale/cmp/redesign.html (see CMP Re-Design Meeting August 7 & 8 Final Minutes - 8-29-01 Attachment 9, Page 8.)	See Qwest's Record of Compliance column.	Qwest has conducted CMP monthly meetings at least once per month since the inception of Qwest's CMP in 1999. In October, 2001, CMP monthly meetings were extended to two full day sessions per the request of the CLEC participants. Qwest has provided meeting materials, also known as distribution packages, since the inception of Qwest's CMP in 1999. An improved distribution package format was introduced in September, 2001 for the Product and Process CMP meetings and in October 2001 for the Systems CMP meetings. Qwest has recorded meeting minutes since August 15, 2001 for Product and Process CMP meetings, and since September 19, 2001 for Systems CMP meetings. Qwest has made a number of improvements to its CMP website as a result of the Redesign effort.	Supporting data can be found at the following URLS: http://www.qwest.com/wholesale/cmp/tmarchive.html (CMP meeting material, including dates of meetings, distribution packages and meeting minutes) http://www.qwest.com/wholesale/cmp/index.html (Qwest's CMP web site)

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 4 **Types of Change** Qwest implemented Section 4 as agreed to by the Redesign Team.	September 20, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting September 18 and 20 Final Minutes, Pages 6 and 7.)	September 20, 2001	Qwest has complied with this process for over 24 months. It should be noted that there was an impasse issue relating to the definition of Regulatory CRs that was resolved on April 4, 2002. However, the team had reached agreement on the other aspects of the definition and the impasse resolution did not change the language contained in the Qwest Wholesale Change Management Process document. There were 4 Regulatory CRs, 0 Industry Guideline CRs, 24 CLEC Originated CRs, and 25 Qwest Originated CRs on the candidate list for the IMA 10.0 Release. There were 2 Regulatory CRs, 16 Industry Guideline CRs, 10 CLEC Originated CRs, and 12 Qwest Originated CRs on the candidate list for the IMA 11.0 Release. It should be noted that the 2 Regulatory CRs were for PID improvements. Effective with Qwest's IMA 12.0 Release and beyond, PID improvements will be treated as either CLEC Originated CRs or Qwest Originated CRs.	The CRs that were candidates for the IMA 10.0 Release, by CR type, can be found at the following URL: http://www.qwest.com/wholesale/downloads/2001/011012/Systems_Distribution_Doc.pdf (See Distribution Package for 10-18-01, Attachment E for CRs originally classified as Regulatory CRs and Attachment F for Qwest Originated and CLEC Originated CRs. NOTE: There were no industry Guideline CRs for the IMA 10.0 Release. The CRs that were candidates for the IMA 11.0 Release, by CR type, can be found at the following URL: http://www.qwest.com/wholesale/downloads/2002/020215/systemsfebdistpackage.pdfhttp://www.qwest.com/wholesale/downloads/2002/020215/systemsfebdistpackage.pdfhttp://www.qwest.com/wholesale/downloads/2002/020215/systemsfebdistpackage.pdf

			There was 1 Regulatory CR, 12 Industry Guideline CRs, 34 CLEC Originated CRs, and 13 Qwest Originated CRs on the candidate list for the IMA 12.0 Release. There was 1 Regulatory CR, 33 CLEC Originated CRs, and 17 Qwest Originated CRs on the candidate list for the IMA 13.0 Release. There were 0 Regulatory CRs, 38 CLEC Originated CRs, and 15 Qwest Originated CRs on the candidate list for the IMA 14.0 Release. There were 0 Regulatory CRs, 38 CLEC originated CRs, and 20 Qwest originated CRs on the candidate list for the IMA 15.0 Release. It should be noted that CLECs have had the ability to submit CRs since the inception of Qwest's Change Management Process f.k.a. CICMP. Between January 1, 2000 and September 30, 2001 Qwest processed and closed 68 OSS Interface CRs.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 5 **Sections 5.1 and 5.2 CLEC-Qwest OSS Interface Change Request Initiation Process** Qwest implemented Section 5.1 as agreed to by the Redesign Team. Qwest implemented the process improvements that were agreed to by the Redesign Team.	September 5, 2001 (Original) Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting September 5 Final Minutes, Page 4.) October 16, 2001 (Revised) Meeting minutes that reflect that the Redesign Team agreed to modify this section may be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting October 16 Final Minutes, Page 2.)	October 1, 2001(Original) October 30, 2001 (Revised)	Qwest has complied with the revised process for 23 months. Between November 1, 2001 and September 30, 2003 Qwest processed 343 new OSS Interface CRs in accordance with the CLEC-Qwest OSS Interface Change Request Initiation Process. There are up to 9 CMP milestones for each CR 1.) Send Acknowledgement; 2.) Post CR to Web; 3.) Contact CR Originator; 4.) Hold Clarification Meeting; 5.) Send Initial Qwest Response; 6.) Post Initial Qwest Response to Web; 7.) Present CR; 8.) Send Final Qwest Response, if applicable; and 9.) Post Final Qwest Response to Web, if applicable. For the time period specified above, Qwest is responsible for missing only 10 milestones of a possible 2242 milestones that have occurred so far. This equates to an average compliance rate of 99.55 Following is a description of the missed milestones: 1.) SCR012802-1	Supporting data can be found at: Http://www.qwest.com/wholesale/cmp/changerequest.html (Select CLEC-Qwest Change Request – Systems Interactive Reports.)

			Milestone Missed: Initial Response Posted to Web Explanation: The initial response was sent to the CLEC on time, however, the initial response was not posted to the web until the following day. A process improvement was implemented in April, 2002 to correct this deficiency. 2.) SCR012802-1 Milestone Missed: Final Response Issued: Explanation: The functionality originally requested is not feasible. However, Qwest agreed to conduct an ongoing analysis of issues identified by the CLECs. Therefore, a final response has not been issued and this CR has not been closed. 3.) SCR012802-1 Milestone Missed: Final Response Posted to Web. Explanation: The functionality originally requested is not feasible. However, Qwest agreed to conduct an ongoing analysis of issues identified by the CLECs. Therefore, a final response has not been issued and this CR has not been closed. 4.) SCR012802-2 Milestone Missed: Initial Response Posted to Web Explanation: The initial response was sent to the CLEC on time,	

			however, the initial response was not posted to the web until the following day. A process improvement was implemented in April, 2002 to correct this deficiency. 5.) SCR062402-01 Milestone Missed: Initial Response Explanation: The initial response was not posted to until the following day. 6.) SCR062402-01 Milestone Missed: Initial Response Explanation Posted to Web: The initial response was not posted until the following day. 7.) SCR122002-0 Add UNE-P Centrex 21 to SATE. Milestone Missed: Acknowledgement of CR. The acknowledgement was missed by one day.8.SCR122002-0 Add Service order inquiry status (SOSI) to SATE. Milestone Missed: Acknowledgement of CR. The acknowledgement was missed by one day. 9.) SCR073003-01 IMA Add New IMA Reject Reason "Requested Product Not Available" Milestone Missed: Acknowledgement of CR was missed due to the evaluation of this CR to determine if it should be processed as a systems or Product/Process CR.	

			) 10.) SCR073003-01 IMA Add New IMA Reject Reason "Requested Product Not Available "Milestone Missed: CR Posted to Web was missed due to the evaluation of this CR to determine if it should be processed as a systems or P/P CR. Correction: Qwest originally reported that it was responsible for missing 1 additional milestone. The milestone was missed because the CLEC did not show up for the clarification meeting so the meeting had to be rescheduled (see SCR120301-1). Note: Discussions to clarify Qwest-originated OSS Interface CRs are generally held informally within Qwest by the originator of the CR and the Qwest Subject Matter Experts (SMEs) before the CR is even submitted to the CMP and meeting minutes are not prepared for such discussions. After the CR is formally submitted to the CMP, it is forwarded to Qwest SMEs, who may clarify the CR (although that is usually not necessary, as clarification discussions have already been held before the CR	

			is submitted to CMP). In general, the date that the CR is forwarded to the Qwest SMEs is the date that is populated in the clarification meeting field in the CLEC-Qwest Systems Interactive Report and thus for milestone measurement purposes.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 5.3 **CLEC Product/Process Change Request Initiation Process** Qwest implemented Section 5.3 as agreed to by the Redesign Team. Qwest implemented the process improvements that were agreed to by the Redesign Team.	September 5, 2001 (Original) Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting September 5 Final Minutes, Page 4.) October 16, 2001 (Revised) Meeting minutes that reflect that the Redesign Team agreed to modify this section may be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting October 16 Final Minutes, Page 2.)	October 1, 2001(Original) October 30, 2001 (Revised)	Qwest has complied with the revised process for 23 months. Between November 1, 2001 and September 30, 2003, Qwest processed 137 new CLEC Product/Process CRs in accordance with the CLEC Product/Process Change Request Initiation Process. There are up to 9 CMP milestones for each CR 1.) Send Acknowledgement; 2.) Post CR to Web; 3.) Contact CR Originator; 4.) Hold Clarification Meeting; 5.) Send Initial Qwest Response; 6.) Post Initial Qwest Response to Web; 7.) Present CR; 8.) Send Final Qwest Response, if applicable; and 9.) Post Final Qwest Response to Web, if applicable. For the time period specified above, Qwest is responsible for missing only 8 milestones out of a possible 1094 milestones that have occurred so far. This equates to an average compliance rate of 99.26% Following is a description of the missed milestones: 1.) PC110201-2	Supporting data can be found at: Http://www.qwest.com/wholesale/cmp/changerequest.html (Select CLEC-Qwest Change Request – Product and Process Interactive Reports.)

			Milestone Missed: Customer Contacted Explanation: Employee was ill, manager did not reassign CR to a backup employee. Missed milestone by 2 days. 2.) PC110201-2 Milestone Missed: Clarification Meeting Held Explanation: CRPM was ill, manager did not reassign CR to a backup employee. Missed milestone by 13 days. It is not clear in the notes why the meeting was scheduled for 11/27. The CLEC was contacted on 11/12. 3.) PC120301-2 Milestone Missed: Clarification Meeting Held Explanation: The date that the clarification meeting should have been held conflicted with the monthly CMP meetings, so the clarification meeting was held 2 days late. 4.) PC120301-3 Milestone Missed: Clarification Meeting Held Explanation: The date that the clarification meeting should have been held conflicted with the monthly CMP meetings, so the clarification meeting was held 2 days late. 5.) PC120301-4 Milestone Missed: Clarification	

			Meeting Held Explanation: The date that the clarification meeting should have been held conflicted with the monthly CMP meetings, so the clarification meeting was held 2 days late. 6.) PC120301-5 Milestone Missed: Clarification Meeting Held Explanation: The date that the clarification meeting should have been held conflicted with the monthly CMP meetings, so the clarification meeting was held 4 days late. 7.) PC110201-1 Milestone Missed: Clarification Meeting Held Explanation: The clarification meeting was held 3 days late. 8.) PC062603-1 Milestone Missed: Send Acknowledgement Explanation: Acknowledgement was missed by 2 days.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 5.4 **Qwest Initiated Product/Process Changes** Qwest implemented Section 5.4 as agreed to by the Redesign Team. Qwest implemented the process improvements that were agreed to by the Redesign Team.	Qwest implemented the process as agreed to in concept during the March 19 CMP Redesign Meeting. Meeting minutes that reflect that the Redesign Team reached agreement in concept on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes –CMP Redesign Meeting March 18 & 19 Final Minutes, Page 10.) April 16, 2002 (Revised and Baselined) Meeting minutes that reflect that the Redesign Team agreed to modify this section may be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting April 16 Draft Minutes, Page 7.)	April 1, 2002 (Original) April 22, 2002 (Revised)	Qwest has complied with the original process for over 17 months and the revised process for over 17 months. Between April 1, 2002 and September 30, 2003, Qwest submitted 738 new Product/Process Changes in accordance with the Qwest Product/Process Change Process. There are 6 CMP Notification Requirements for each Level 1 Change. Issue notice with the following: 1.) Level of disposition, 2.) Description of change 3.) Note that changes are effective immediately 4.) List no comment cycle and contact email for CMP Manager 5.) Include web notification form or redlined document, if required. 6.) Include history log, if required. There are 11 CMP Notification Requirements for each Level 2 Change. Issue notice with the following: 1.) Level of disposition, 2.) Description of change 3.) List of comment cycle timeframes 4.) Provide comment URL 5.) Note the	Supporting data can be found at: http://www.qwest.com/wholesale/notices/cnla/ (Select Product, Process, Training, Network-Tech Pubs) Http://www.qwest.com/wholesale/cmp/changerequest.html (Select CLEC-Qwest Change Request – Product and Process Interactive Reports)

			proposed effective date, 6.) Link to Document Review web site, if required; 7.) Post documentation on to the Document Review web site, if required; 8.) Include web notification form or redlined document, if required; 9.) Include history log, if required; 10.) Response to CLEC comments, if applicable. 11.) Final notification, if applicable. There are 11 CMP Notification Requirements for each Level 3 Change. Issue notice with the following: 1.) Level of disposition, 2.) Description of change 3.) List of comment cycle timeframes 4.) Provide comment URL 5.) Note the proposed effective date, 6.) Link to Document Review web site, if required; 7.) Post documentation on to the Document Review web site, if required; 8.) Include web notification form or redlined document, if required; 9.) Include history log, if required; 10.) Response to CLEC comments, if applicable. 11.) Final notification. There are 9 CMP milestones for each Level 4-Change Request Change 1.) Send Acknowledgement; 2.) Post CR to Web; 3.) Contact CR	

			Originator; 4.) Hold Clarification Meeting; 5.) Send Initial Qwest Response; 6.) Post Initial Qwest Response to Web; 7.) Present CR; 8.) Send Final Qwest Response, if applicable; and 9.) Post Final Qwest Response to Web, if applicable. In addition there are 11 CMP Notification Requirements. Issue notice with the following: 1.) Level of disposition, 2.) Description of change 3.) List of comment cycle timeframes 4.) Provide comment URL 5.) Note the proposed effective date, 6.) Link to Document Review web site, if required; 7.) Post documentation on to the Document Review web site, if required; 8.) Include web notification form or redlined document, if required; 9.) Include history log, if required; 10.) Response to CLEC comments, if applicable. 11.) Final notification. For the time period specified above Qwest initiated 437 Level 1 changes, 153 Level 2 changes, 102 Level 3 changes, and 46 Level 4 changes. Qwest is responsible for missing 2Level 4-CR milestones out of a possible 487 milestones that	

			have occurred so far. This equates to an average compliance rate of 99.59% Qwest is responsible for missing only 10Level 1-4 CMP Notification Requirements out of a possible 4914 that have occurred so far. This equates to an average compliance rate of 99.79% Following is a description of the missed Level 4 CR milestones: 1.) PC100202-1 Milestone Missed: Initial Response posted to the web Meeting Held Explanation: Date missed due to a posting error 2.) PC101802-2IG Milestone Missed: Initial Response posted to the web Meeting Held Explanation: Date missed due to a posting error Following is a description of the missed notification milestones: 1) Notification number: PROS.04.03.02.F.00415.Billing_Output. No level. 2) Notification number: PROS.04.03.02.F.00415.Billing_Output. No comment cycle explanation. 3) Notification number: PROS.04.04.02.F/00418.Ser	

			vice_Managers. No level 4) PROS.04.04.02.F/00418.Service_Managers. No comment cycle explanation. 5) Notification number: TRNG.04.23.02.F.02166.May_TRNG_Schedule. No level 6) Notification number: TRNG.04.23.02.F.02166.May_TRNG_Schedule. No comment cycle explanation 7) Notification number: TRNG.04.03.02.F.02167.2Q02_Update. No level 8) Notification number: TRNG.04.03.02.F.02167.2Q02_Update. No comment cycle explanation. 9) Notification number: NETW.04.19.02.R.01810.#77405_D. Delay in response to comments. 10) Notification number: NETW.04.19.02.R.01810.#77405_D. Delay in final notification. Note: Through the CMP, a CMP CR was issued to change Qwest's process for redlining and green highlighting (PC100102-1CM was voted on by the CLEC community on December 18, 2002 and the CMP Document was revised on	

			January 6, 2003). This process changed the associated milestones. Qwest is 100% compliant with the new milestones. Note: For Qwest-originated Product and Process CRs, the CMP framework does not require clarification meetings to be held, but Qwest has included this as a CMP milestone. Discussions to clarify Qwest-originated Product or Process CRs are generally held informally within Qwest by the originator of the CR and Qwest Subject Matter Experts (SMEs) before the CR is even submitted to the CMP, and meeting minutes are not prepared for such discussions. After the CR is formally submitted to CMP, Qwest SMEs may, but generally do not, clarify the CR. In addition, Qwest generally holds meetings with the CR originator after submission of the CR to CMP to discuss such matters as the CMP requirements related to the CR. In general, this is the meeting date that is populated in the clarification meeting field in the CLEC-Qwest Product-Process Interactive Report.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 5.5 Postponement Qwest implemented Section 5.5 as agreed to by the Redesign Team.	June 5, 2002 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://qwest.com/wholesale/cmp/redesign.html (see CMP Re-Design Meeting Minutes for June 5-6)	June 19, 2002	This process has been in place for over 15 months. During this time, the Postponement Process has not been evoked.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 6 **OSS Interface Release Calendar** Qwest implemented Section 6 as agreed to by the Redesign Team.	October 16, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting October 16 Final Minutes, Page 3.)	November, 2001	Qwest has complied with the improved OSS Interface Release Calendar for 22 months. The previous Calendar already provided OSS Release information, but was improved with the inclusion of additional customer facing system information. The revised OSS Interface Release Calendar was posted on the web in November 2001. Quarterly updates were posted on the web in January 2002, April 2002, July 2002, October 2002, January 2003, April 2003 and July 2003	The current view of Qwest's OSS Interface Release Calendar can be found at the following URL: http://www.qwest.com/wholesale/cmp/osscalendar.html

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 7 **Introduction of a New OSS Interface** **Section 7.1** **Introduction of a New Application to Application Interface**	November 1, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting November 1 Final Minutes, Page 11.)	November, 2001.	Qwest is introducing a new OSS Interface (ASR Pre-Order via XML) on October 29, 2003. There are 8 CMP milestones for the introduction of a new OSS Interface: 1.) Release Notification; 2.) CLEC Comments and Qwest Response; 3.) Implementation Plan review meeting; 4) Draft Technical Specifications issued; 5.) Walk through of Draft Technical Specifications; 6.) CLEC Comments and Qwest Response; 7.) Final Technical Specifications; and 8.) Release into Production. Qwest is currently 100% in compliance with the milestones it has reached to date.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 7.2 **Introduction of a New GUI** Qwest implemented Section 7 as agreed to by the Redesign Team.	November 1, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting November 1 Final Minutes, Page 11.)	November, 2001	Qwest introduced a new GUI (FORCAST) on March 8, 2002. There are 6 CMP milestones for the introduction of a new GUI: 1.) Release Notification; 2.) Issue Draft Release Notes, 3.) Interface Overview; 4.) CLEC Comments and Qwest Response; 5.) Final Notification; and 6.) Deployment. Qwest demonstrated 100% compliance with these milestones. Qwest introduced a new GUI (QORA) on September 19, 2003. Qwest is currently 100% in compliance with the milestones it has reached to date.	Supporting data can be found at the following URL: http://www.qwest.com/wholesale/notices/cnla/bysubcat/1,1834,38,00.html

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 8.0 **Change to Existing OSS Interfaces** Qwest implemented Section 8.0 as agreed to by the Redesign Team.	November 1, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting November 1 Final Minutes, Page 8.	See Qwest's Record of Compliance column.	Qwest agreed to implement no more than 3 major IMA releases and 3 IMA point releases within a calendar year. Qwest has complied with this process for over 2 years. In 2001, Qwest implemented 2 major and 3 point releases. In 2002, Qwest implemented 3 major and 2 point releases. Qwest agreed to support the previous major IMA release for 6 months after the subsequent major IMA EDI (i.e., application to application) release has been implemented. Qwest has complied with this process for over 2 years. IMA Release 6.0 was implemented December 8, 2000 and IMA Release 5.0 was retired June 8, 2001. IMA Release 7.0 was implemented April 22, 2001 and IMA Release 6.0 was retired December 7, 2001. (Qwest exceeded its commitment to the CLECs.) IMA Release 8.0 was	

			implemented August 18, 2001 and IMA Release 7.0 was retired March 16, 2002. (Qwest exceeded its commitment to the CLECs.) IMA Release 9.0 was implemented February 25, 2002 and IMA Release 8.0 was retired October 18, 2002. (Qwest exceeded its commitment to the CLECs.) IMA Release 10.0 was implemented June 17, 2002 and IMA Release 9.0 was retired on December 17, 2002. (Qwest exceeded its commitment to the CLECs.) IMA Release 11.0 was implemented November 18, 2002. IMA Release 12.0 was implemented April 7, 2003 and IMA Release 10.0 was retired on July 18, 2003 IMA Release 13.0 was implemented August 4, 2003. Qwest agreed, except in one instance which followed the Exception Process, that major IMA releases should occur no less than 3 months apart. Qwest has complied with this process	

			for over 2 years. (See release dates above.) In the instance, with IMA 13.0 QWEST issued CR# SCR010203-01EX Exception request to change the IMA 13.0 Timeline. This change was voted on and unanimously approved.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 8.1 **Application to Application Interface** Qwest implemented Section 8.1 as agreed to by the Redesign Team.	November 1, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting November 1 Final Minutes, Page 8.	November, 2001		Supporting data can be found at the following URL: http://www.qwest.com/wholesale/notices/cnla/bysubcat/1,1834,56,00.html

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 8.2 **Graphical User Interface** Qwest implemented Section 8.2 as agreed to by the Redesign Team.	November 1, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting November 1 Final Minutes, Page 8.	November, 2001	Qwest introduced changes to an existing OSS Interface – GUI (CEMR) on April 7, 2002, November 3, 2002, March 17, 2003, April 14, 2003, and August 18, 2003. IMA-GUI 10.0 Release on April 4, 2002, IMA-GUI 11.0 on November 18, 2002, IMA-GUI 12.0 on April 7, 2003 and IMA-GUI 13.0 on August 4, 2003. There are 4 CMP milestones for changes to an existing GUI: 1.)	http://www.qwest.com/wholesale/notices/cnla/bysubcat/1,1834,45,00.html (See CEMR Release 1.03.06 notices.0

			Draft GUI Release Notice; 2.) Qwest Response to CLEC Comments; 3.) Final Interface Release Notice; and 4.) Deployment. Qwest demonstrated 100% compliance with these milestones.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 9 **Retirement of Existing OSS Interface**	November 1, 2001 Meeting minutes that reflect that the Redesign Team discussed this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://www.qwest.com/wholesale/cmp/redesign.html (See Meeting Minutes – CMP Redesign Meeting November 1 Final Minutes, Page 12. Although the minutes do not specifically reflect that agreement was reached, the process was incorporated in the Qwest Wholesale Change Management Process document, which is indicative of acceptance.	November, 2001.	Qwest implemented a Retirement of an Existing OSS Interface – Graphical User Interface (CTAG) on July 22, 2002. There are 5 CMP milestones for retirement of an existing Graphical User Interface: 1.) Initial Retirement Notice; 2.) Qwest Response to CLEC Comments; 3.) Establish comparable functionality; 4.) Final Retirement Notice; 5.) Retirement. Qwest demonstrated 100% compliance with these milestones.	Supporting data can be found at the following URL: http://www.qwest.com/wholesale/notices/cnla/bysubcat/1,1834,38,00.html

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 10 Prioritization Qwest implemented Section 10 and subsequent modifications to it as agreed to by the Redesign Team.			The CLECs have been able to prioritize CRs as described below: There were 4 Regulatory CRs, 0 Industry Guideline CRs, 24 CLEC Originated CRs, and 25 Qwest Originated CRs on the candidate list for the IMA 10.0 Release. The CLECs prioritized everything except the Regulatory CRs in August 2001 and again in October/November 2001. There were 2 Regulatory CRs, 16 Industry Guideline CRs, 10 CLEC Originated CRs, and 12 Qwest Originated CRs on the candidate list for the IMA 11.0 Release. It should be noted that the 2 Regulatory CRs were for PID improvements. The CLECs prioritized everything except the Regulatory CRs. Effective with Qwest's IMA 12.0 Release and beyond, PID improvements will be treated as either CLEC Originated CRs or Qwest Originated CRs. There was 1 Regulatory CR, 12 Industry Guideline CRs, 34 CLEC Originated CRs, and 13 Qwest Originated CRs on the	The CRs that were candidates for the IMA 10.0 Release, by CR type, can be found at the following URL: http://www.qwest.com/wholesale/downloads/2001/011012/Systems_Distribution_Doc.pdf (See Distribution Package for 10-18-01, Attachment E for CRs originally classified as Regulatory CRs and Attachment F for Qwest Originated and CLEC Originated CRs. NOTE: There were no industry Guideline CRs for the IMA 10.0 Release. The CRs that were candidates for the IMA 11.0 Release, by CR type, can be found at the following URL: http://www.qwest.com/wholesale/downloads/2001/011012/Systems_Distribution_Doc.pdf See Distribution Package for 10-18-01, Attachment E for CRs originally classified as Regulatory CRs and Attachment F for Qwest Originated and CLEC Originated CRs. NOTE: There were no industry Guideline CRs for the IMA 10.0 Release.

			candidate list for the IMA 12.0 Release. There was 1 Regulatory CR, 33 CLEC Originated CRs, and 17 Qwest Originated CRs on the candidate list for the IMA 13.0 Release. There were 0 Regulatory CRs, 38 CLEC Originated CRs, and 15 Qwest Originated CRs on the candidate list for the IMA 14.0 Release. There were 0 Regulatory CRs, 38 CLEC originated CRs, and 20 Qwest originated CRs on the candidate list for the IMA 15.0 Release.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 11 Application-to-Application Interface Testing Qwest implemented Section 11 as agreed to by the Redesign Team.	February 7, 2002 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://qwest.com/wholesale/cmp/redesign.html (see CMP Redesign Meeting February 5 - 7 Final Minutes – 03/12/02, Page 14, Paragraph 2.)	February, 2002	Although through the Redesign process the team agreed to the improved process for interface testing, it should be noted that SATE has been available to the CLECs since August 2001 and was used by CLECs to migrate their systems to the IMA 8.0 Release and later releases.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 12 **Production Support** Qwest implemented Section 12 as agreed to by the Redesign Team.	December 10 ,2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://qwest.com/wholesale/cmp/redesign.html (see CMP Redesign Meeting December 10-11 Final Minutes, Page 7.)	February 2002	Qwest has complied with this process for nearly 19 months. Between February 2, 2002 and September 30, 2003, there were 75 planned outages. Qwest missed the notification interval 1 time on March 31, 2003. (SYST.03.31.03.F.04282.SchdDwnTmlMAEDIGUI) Qwest has demonstrated 98.41% compliance with this process. It has been Qwest's practice, prior to the Redesign effort, to conduct post-deployment meetings. Between February 1,2002 and September 30, 2003, Qwest processed 3 Severity 1s, 217 Severity 2s, 4292 Severity 3s, and 7 Severity 4s. Correction: Qwest previously reported 3 Severity 4's. These Severity 4's were resolved and closed during the initial help desk contact, and therefor not subject to the Production Support Process. On June 18, 2002, CLECs and Qwest agreed to processes for	Supporting data can be found at the following URL: http://www.qwest.com/wholesale/notices/cnla/bysubcat/1,1834,38,00.html (See Planned Outage notification type.) Supporting data can be found at the following URL: http://www.qwest.com/wholesale/notices/cnla/bysubcat/1,1834,56,00.html (See 3/27 Release Notice SYST.03.27.02.F.04001.IMA_Rlse_9_01.doc

			Product/Process production support. Qwest implemented this process on July 15, 2002. Note: In the process of preparing the reply comments for the OSS Declaration in the FCC 271 proceedings, Qwest discovered that a number of event notifications that were required to be issued by the CMP Framework had not been issued, even though the underlying defects had been corrected. After investigating the reasons for the non-issuance of these notifications, it became apparent that there was confusion among some members of the Qwest IT Staff. Once it identified the missing event notification problem and its cause, Qwest promptly issued clarifying instructions to the IT Staff so that going forward there will be no confusion.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 13 **Training** Qwest implemented Section 13 as agreed to by the Redesign Team.	May 2, 2002 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://Qwest.com/wholesale/cmp/redesign.html (see CMP Re-Design Meeting May 1-2, Page 11)		Although the Redesign Team agreed to the documented process for training, it should be noted that Qwest has provided training on OSS Interfaces and Product/Process changes since the beginning of 2000.	Supporting data can be found at the following URL: http://www.qwest.com/wholesale/training/index.html

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 14 **Escalation Process** Qwest implemented Section 14 as agreed to by the Redesign Team.	September 20, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://qwest.com/wholesale/cmp/redesign.html (See CMP Re-Design Meeting Sept. 18 & 20 Final Minutes – 10/10/01, Page 3.)	November 16, 2001	Qwest has complied with the Escalation Process for 22 months Between November 16, 2001 and September 30, 2003, Qwest processed 11 OSS Interface escalations and 7 Product/Process escalations in accordance with the CMP Escalation Process. There are 8 CMP milestones for each escalation: 1.) Monitor Escalation; 2.) Validate Escalation; 3.) Acknowledge Escalation; 4) Post Escalation to Web; 5.) Notify CLECs of Escalation 6.) Monitor for Participation; 7.) Qwest Binding Position; and 8.) Monitor for CLEC Response. Qwest is responsible for missing 1 milestone out of a possible 143 milestones. This equates to an average compliance rate of 99.30% In accordance with the CMP, Qwest must post an escalation on the web within 1 business day of receipt of the complete escalation. Qwest missed this milestone by 1 day for PC102301-2-E02.	Supporting data can be found at: Http://www.qwest.com/wholesale/cmp/index.html (See Escalations and Disputes - Initiation - Ongoing - Archive

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 15 **Dispute Resolution** Qwest implemented Section 15 as agreed to by the Redesign Team.	September 20, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://QWEst.com/wholesale/cmp/redesign.html (see CMP Re-Design Meeting Sept. 18 & 20 Final Minutes - 10-10-01, Page 5.)	November 16, 2001	This process has been in place for 22 months, but has not been invoked since agreement on the process was reached. Qwest's Dispute Resolution tool may be found on Qwest's CMP web site.	Supporting data can be found at: http://qwest.com/wholesale/cmp/escdisp.html See Escalations and Disputes - Initiation - Ongoing - Archive

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 16 Exception Qwest implemented Section 16 as agreed to by the Redesign Team.	June 6, 2002 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://qwest.com/wholesale/cmp/redesign.html (see CMP Re-Design Meeting Minutes for June 5-6)	June 19, 2002 (original)	This process has been in place for over 15 months. During this time, Qwest has received 20 Exception requests. There are 6 CMP milestones for the Exception process: 1.) Acknowledge receipt of Exception submission; 2.) Issue Notification of pre-meeting; 3.) Conduct pre-meeting; 4.) Issue vote notification and ballot; 5) Conduct vote; 6.) Post disposition notification and tally form. Qwest is responsible for missing 2 milestone out of a possible 120 milestones. This equates to an average compliance rate of 98.33%. Following is a description of the missed notification milestones: 1) CR Number: SCR041703-04EX (MCI exception) Milestone missed: The disposition notification and tally form were not posted on time. 2) CR Number: SCR041703-04EX (Qwest exception) Milestone missed: The disposition notification and tally form were not posted on time.	Supporting data can be found at: http://www.qwest.com/wholesale/cmp/teammeetings.html and http://www.qwest.com/wholesale/notices/cnla/

			Note: Through the Redesign Process on September 12, 2002, the milestones were amended to require a pre-meeting for all Exception Requests.	

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 17 **Voting** Qwest implemented Section 17 as agreed to by the Redesign Team.	July 10, 2002 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://qwest.com/wholesale/cmp/redesign.html (see CMP Re-Design Meeting Minutes for July 10)	July 17, 2002	This process has been in place for over 14 months. During this time, Qwest has conducted 27 votes. There are 3 CMP milestones for the Voting process: 1.) Issue Notification of a vote; 2.) Issue Notification of vote result; 3.) Post vote result and meeting minutes. Qwest is responsible for missing 2 milestones out of a possible 81 milestones. Qwest has demonstrated 97.53%compliance with these milestones. Following is a description of the missed notification milestones: 1.) CR Number: SCR041703-04EX (MCI exception) Milestone missed: The disposition notification and tally form were not posted on time. 2.) CR Number: SCR041703-04EX (Qwest exception) Milestone missed: The disposition notification and tally form were not posted on time.	Supporting data can be found at: http://www.qwest.com/wholesale/cmp/teammeetings.html and http://www.qwest.com/wholesale/notices/cnla/

Change Management Improvements
9-30-03

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
Section 18 **Oversight Review Process** Qwest implemented Section 18 as agreed to by the Redesign Team.	September 13, 2002 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Qwest Wholesale Change Management Process document can be found at the following URL: http://qwest.com/wholesale/cmp/redesign.html (see CMP Re-Design Meeting Minutes for September 12-13)	September 18, 2002	This process has been in place for over 12 months. During this time, 4 referrals have been made to the Oversight Review Committee.	Qwest developed a web site to manage requests and information relating to the Oversight Review Process. This web site is located at: http://www.qwest.com/wholesale/cmp/coc.html

Arizona Corporation Commission
Docket No. T-03406A-06-0257
Docket No. T-01051B-06-0257
Qwest Corporation – JM-2
Exhibits of Jill Martain

EXHIBIT JM-2

History Log

Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
1	Master Redlined CLEC-Qwest CMP Re-design Framework - Revised 02-07-02 – CLEAN – Version 1.0	02-07-02	All			Accepted changes to Master Redlined CLEC-Qwest CMP Redesign Framework
2	Master Redlined CLEC-Qwest CMP Re-design Framework - Revised 02-20-02 – CLEAN – Version 2.0	02-20-02	2.1	Types of Change	Regulatory Change	Added changes to Regulatory Changes section as agreed to at Feb 19 Redesign Meeting.
3	MasterRedlineCLEAN030702	03-11-02	3.1	Change Request Initiation Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added language agreed to at March 7 Redesign Meeting.
4			9.0	Prioritization	N/A	Added language agreed to at March 7 Redesign Meeting.
5			9.3	Prioritization	SCRP	Added language agreed to at March 7 Redesign Meeting.
6			5.1.6	Change to Existing Interfaces	Final Interface Technical Specifications	Added language agreed to at March 7 Redesign Meeting.
7	MasterRedlineCLEAN032702	03-27-02	3.1	Change Request Initiation Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added Reasons for Denial Language
8			3.3	Change Request Initiation Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added Reasons for Denial Language
9	MasterRedlineCLEAN040802	04-08-02	1.0	Introduction and Scope		Added language agreed to at April 4 Redesign Meeting.
10			2.0	Managing The CMP		Added language agreed to at April 4 Redesign Meeting. Moved Section to 2.0 from 7.0
11			3.0	Meetings		Moved section to 3.0 from 8.0.
12			6.0	OSS Interface Release Calendar		Added language agreed to at April 4 Redesign Meeting.
13			10.0	Prioritization		Moved Appendices to end of document
14			10.2.4	Prioritization	Late Adder	Added language agreed to at April 4 Redesign Meeting.
15	MasterRedlineCLEAN041602b	04-16-02	5.4	Change Request Initiation Process	Qwest Originated Product/Process	Added language agreed to at April 16 Redesign Meeting.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

EXHIBIT JM-1

Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
					Changes	
16	MasterRedlineCLEAN050202	05-02-02	5.1	Change Request Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added revised language agreed to at May 2. 2002 Redesign Meeting.
17			5.5	Change Request Process	Crossover Change Requests	Added revised language agreed to at May 2. 2002 Redesign Meeting.
18			10.2.5	Prioritization	Withdrawal of Prioritized CRs	Added language agreed to at May 2. 2002 Redesign Meeting.
19			10.3	Prioritization	SCRP	Added revised language agreed to at May 2. 2002 Redesign Meeting.
20			13.0	Training	N/A	Added language agreed to at May 2. 2002 Redesign Meeting.
21	MasterRedlineCLEAN052202a	05-22-02	5.6	Change Request Process	Change Request Status Codes	Added language agreed to at May 21-22. 2002 Redesign Meeting.
22			5.7	Change Request Process	Change Request Suffixes	Added language agreed to at May 21-22. 2002 Redesign Meeting.
23	MasterRedlineCLEAN060602	06-06-02	2.5	Managing the Change Management Process	Method of Communication	Added language agreed to at June 5-6, 2002 Redesign Meeting.
24			5.1	Change Request Process	CR Initiation Process	Added language agreed to at June 5-6, 2002 Redesign Meeting.
25			5.3	Change Request Process	CLEC Product/Process Change Request Initiation Process	Added language agreed to at June 5-6, 2002 Redesign Meeting.
26			5.3	Change Request Process	CLEC Product/Process Change Request Initiation Process	Added IMA Software Development Timeline agreed to at June 5-6, 2002 Redesign Meeting.
27			5.5	Change Request Process	Postponement and Arbitration of a Product/Process Change	Added language agreed to at June 5-6, 2002 Redesign Meeting.
28			5.6, 5.7, and 5.8	Change Request Process	Multiple	Renumbered based on addition of new Section 5.5
29			16.0	Exception Process		Added language agreed to at June 5-6, 2002 Redesign Meeting.
30			Definition of Terms	Definition of Terms		Added language agreed to at June 5-6, 2002 Redesign Meeting.
31			All	All	All	Cosmetic and clarifying changes agreed to at June 5-6, 2002 Redesign Meeting.
32	MasterRedlineCLEAN061802	06-18-02	2.1	Managing the	Managing the Change	Added language agreed to at June 17-18, 2002

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Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
				Change Management Process	Management Process Document	Redesign Meeting.
33			12.4	Production Support	Reporting Trouble to IT	Added language agreed to at June 17-18, 2002 Redesign Meeting.
34			12.5	Production Support	Severity Levels	Made changes at June 17-18, 2002 Redesign Meeting.
35			12.8	Production Support	Process Production Support	Added language agreed to at June 17-18, 2002 Redesign Meeting.
37	MasterRedlinedCLEAN071002	07-10-02	2.2	Managing the Change Management Process	Change Management Point of Contact (POC)	Added language agreed to at July 10, 2002 Redesign Meeting.
38			2.3	Managing the Change Management Process	Change Management Point of Contact (POC) List	Added language agreed to at July 10, 2002 Redesign Meeting.
39			17.0	Voting	n/a	Added language agreed to at July 10, 2002 Redesign Meeting.
40			All	All	All	Cosmetic and clarifying changes agreed to at July 10, 2002 Redesign Meeting.
41	MasterRedlinedCLEAN072302	07-23-02	10.0	Prioritization		Revised language agreed to at July 23, 2002 Redesign Meeting.
42			10.1	Prioritization	Test Environment Releases	Added language agreed to at July 23, 2002 Redesign Meeting.
43			All	All	All	Cosmetic and clarifying changes agreed to at July 23, 2002 Redesign Meeting.
44	MasterRedlinedCLEAN072602	07-26-02	1.0	Introduction and Scope		Revised language agreed to at July 26, 2002 Redesign Meeting.
45			2.4.4	Managing the Change Management Process	Implementation Obligations	Added language agreed to at July 26, 2002 Redesign Meeting.
46			5.6	Change Request Process	Comparability of Change Request Treatment	Added language agreed to at July 26, 2002 Redesign Meeting.
47			10.1	Prioritization	Test Environment Releases	Revised language agreed to at July 26, 2002 Redesign Meeting.
48	QwestWhslChgMgtDoc091302	09-13-02	All			Accepted all agreed to CLEAN-UP changes and additions from multiple Redesign Meetings.
49			2.1	Managing the Change	Managing the Change Management Process	Added language agreed to at multiple CLEAN-UP Redesign Meetings.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
				Management Process	Document	
50			2.4.4	Managing the Change Management Process	Implementation Obligations	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
51			2.4.5	Managing the Change Management Process	Adherence to this CMP	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
52			2.5	Managing the Change Management Process	Method of Communication	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
53			3.0	Meetings		Added language agreed to at multiple CLEAN-UP Redesign Meetings.
54			5.1.2	Change Request Process	Implementation of Industry Guideline CRs	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
55			5.6	Managing the Change Management Process	Comparability of Change Request Treatment	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
56			16.2	Exception Process	Emergency Call/Meeting Notice to Discuss Exception Request	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
57			16.3	Exception Process	Notice of Exception Request Discussion and Vote at Upcoming CMP Meeting	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
58			18.0	Oversight Review Process		Added language agreed to at multiple CLEAN-UP Redesign Meetings.
59	QwestWhslChgMgtDoc100902	10-09-02	All			Added language and accepted CLEAN-UP changes and additions from 10-08-02 and 10-09-02 Redesign Meetings.
60	QwestWhslChgMgtDoc101502	10-15-02	17.0			Added language proposed by AT&T and accepted by Qwest and WorldCom on 10-15-02.
61	QwestWhslChgMgtDoc010603	01-06-03	12.0	Production Support	Request for a Production Support Change	Modified language as approved by unanimous CMP vote at December 18, 2002, Monthly CMP Product/Process Meeting
62			5.0	Change Request Process	Level 1 Process/Deliverables	Modified language as approved by unanimous CMP vote at December 18, 2002, Monthly CMP

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Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
						Product/Process Meeting
63			5.0	Change Request Process	Level 2 Process/Deliverables	Modified language as approved by unanimous CMP vote at December 18, 2002, Monthly CMP Product/Process Meeting
64			5.0	Change Request Process	Level 3 Process/Deliverables	Modified language as approved by unanimous CMP vote at December 18, 2002, Monthly CMP Product/Process Meeting
65			5.0	Change Request Process	Level 4 Process/Deliverables	Modified language as approved by unanimous CMP vote at December 18, 2002, Monthly CMP Product/Process Meeting
66	QwestWhslChgMgtDoc053003	05-30-03	8.0	Change to an Existing OSS Interface		Modified language as approved by unanimous CMP vote at May 27, 2003, Ad Hoc CMP Product/Process Meeting
67	QwestWhslChgMgtDoc061803	06-18-03	5.0	Change Request Process	Systems Change Request Origination Process	Modified language as approved by unanimous CMP vote at the June 18, 2003, CMP Product/Process Meeting
68	QwestWhslChgMgtDoc121103	12-11-03	5.1.4, 10.3.1, 10.4	Change Request Process, Prioritization	Systems Change Request Origination Process, Prioritization Review, Special Change Request Process	Modified language as approved by unanimous CMP vote at September 17, 2003, CMP Product/Process Meeting
69	QwestWhslChgMgtDoc041904	04-19-04	3.0	Change Management Process Meetings		Added language agreed to at the January 2004 CMP Product/Process Meeting
			12.4 12.5	Production Support	Reporting Trouble to IT Severity Levels	Added language agreed to at the January 2004 CMP Product/Process Meeting
			12.7	Production Support	Notification Intervals	Added language agreed to at the January 2004 CMP Product/Process Meeting
			12.3	Production Support	Request for a Production Support Change	Added language around making a software patch or event notification or initiate a meeting to discuss the patch
70	QwestWhslChgMgtDoc022105	02-21-05	5.1.4	Change Request Process	Systems Change Request Origination Process	Added language agreed to at the December 2004 CMP Product/Process Meeting
			5.2.5	Change Request Process	Code & Test	Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.0	Change to an Existing OSS Interface		Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.1.1	Change to an Existing OSS	Draft Interface Technical Specifications	Added language agreed to at the December 2004 CMP Product/Process Meeting

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Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
				Interface		
			8.1.2	Change to an Existing OSS Interface	Walk Through of Draft Interface Technical Specifications	Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.1.3	Change to an Existing OSS Interface	**CLEC Comments on Draft Interface Technical Specifications**	Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.1.4	Change to an Existing OSS Interface	Qwest Response to CLEC Comments	Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.1.5	Change to an Existing OSS Interface	Final Interface Technical Specifications	Added language agreed to at the December 2004 CMP Product/Process Meeting
			10.1	Prioritization	Test Environment Releases	Added language agreed to at the December 2004 CMP Product/Process Meeting
71	QwestWhslChgMgtDoc030305	03-03-05	Table of Contents			Modified Appendix D entry to relay most current effective date on Sample CR Form
			Appendix D	Sample Change Request Form – As Of 03/03/05		Updated Appendix D – Sample Change Request Form with most current approved document as agreed to in January 2005 CMP Product/Process Meeting
72	QwestWhslChgMgtDoc032805	03-28-05	3.0	Change Management Process Meetings		Added language agreed to at the March 2005 CMP Product/Process Meeting
73	QwestWhslChgMgtDoc091305	09-13-05	11.0	Application-to-Application Interface Testing		Remove reference to interoperability testing environment.
			Definition of Terms	Definition of Terms	Design, Development, Notification, Testing, Implementation and Disposition	Remove reference to interoperability testing environment in both the Term and Definition portion.
74	QwestWhslChgMgtDoc110805	11-08-05	5.8	Change Request Process	Change Request Status Codes	Modified wording on when a CR is moved to CLEC test (See CR 072705-1CM)
75	QwestWhslChgMgtDoc013006	01-30-06	14.2	Escalation Process	Cycle	Added language to change the Escalation Process when a meeting is held to discuss the escalation. Qwest will also respond to the originating CLEC and copy the participating CLECs with the binding position via email.

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Qwest Wholesale Change Management Process Document -

CHANGE MANAGEMENT PROCESS (CMP) FOR LOCAL SERVICES

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CHANGE MANAGEMENT PROCESS (CMP)

1.0 INTRODUCTION AND SCOPE

This document defines the processes for change management of Operations Support Systems (OSS) Interfaces, products and processes (including manual) as described below. CMP provides a means to address changes that support or affect pre-ordering, ordering/provisioning, maintenance/repair and billing capabilities and associated documentation and production support issues for local services (local exchange services) provided by Competitive Local Exchange Carriers (CLECs) to their end users. This CMP is applicable to Qwest's 14 state in-region serving territory.

This CMP is managed by CLEC and Qwest Points of Contact (POCs) each having distinct roles and responsibilities. The CLECs and Qwest will hold regular meetings to exchange information about the status of existing changes, the need for new changes, what changes Qwest is proposing, how the process is working, etc. The process also allows for escalation to resolve disputes, if necessary.

Qwest will track changes to OSS Interfaces, products and processes. This CMP includes the identification of changes and encompasses, as applicable, Design, Development, Notification, Testing, Implementation, Disposition of changes, etc. (See Change Request Status Codes, Section 5.8). Qwest will process any such changes in accordance with this CMP.

In cases of conflict between the changes implemented through this CMP and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement. In addition, if changes implemented through this CMP do not necessarily present a direct conflict with a CLEC interconnection agreement, but would abridge or expand the rights of a party to such agreement, the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such agreement.

This CMP is dynamic in nature and, as such, is managed through the regularly scheduled meetings. The parties agree to act in Good Faith in exercising their rights and performing their obligations pursuant to this CMP. This document may be revised through the procedures described in Section 2.0.

Any opinions expressed at the CMP meetings by representatives of government agencies such as state Public Utilities Commissions (PUC), Federal Communications Commission (FCC), and the Department of Justice (DOJ) do not bind such government agencies.

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Throughout this CMP document, terms such as "agreement" or "consensus" are used to identify instances when participants attempt to informally arrive at a unanimous decision by the CMP group at a noticed CMP Meeting. At any time, when the parties cannot informally reach a decision, the parties may continue to work together to reach resolution or conduct a vote in accordance with Section 17.0.

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2.0 MANAGING THE CHANGE MANAGEMENT PROCESS

2.1 Managing the Change Management Process Document

Proposed modifications to this CMP framework shall be originated by a change request submitted by CLEC or Qwest in accordance with Section 5.0. Acceptance of such changes will be discussed at a regularly scheduled Monthly CMP Product/Process Meeting.

The originator of the change will send proposed redlined language and the reasons for the request with the change request at least fourteen (14) days in advance of the Monthly CMP Product/Process Meeting. The request originator will present the proposal to the CMP participants. The parties will develop a process for input into the proposed change including when the vote will be taken. Incorporating a change into this CMP requires unanimous agreement using the Voting Process, as described in Section 17.0. Each CMP change request will be assigned a CR number that contains a suffix of "CM" and will be included in the Monthly CMP Product/Process Meeting distribution package. The CMP change request and redlined language will be included in the Monthly CMP Product/Process Meeting distribution package and the CMP change request will be identified as a proposed change to the CMP framework on the agenda. The requested change will be reviewed at a Monthly CMP Product/Process Meeting and voted on no earlier than the following CMP Product/Process meeting. The agenda for the Monthly CMP Product/Process Meeting, at which the vote will be taken, will indicate that a vote will be taken.

There will be a standing agenda item for each monthly CMP Meeting for discussion about issues relating to the operation and effectiveness of CMP. This discussion is intended to be open and receptive to all input with the goal of constantly evaluating and improving this CMP.

2.2 Change Management Point-of-Contact (POC)

Qwest and each CLEC will designate primary, secondary, and, if desired, tertiary change management POC(s), who will serve as the official designees for matters regarding this CMP. CLECs and Qwest will exchange primary, secondary and tertiary POC information including items such as:

- Name
- Title
- Company
- Telephone number
- E-mail address
- Fax number
- Cell phone/Pager number
- POC designation (e.g., primary, secondary, or tertiary)

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2.3 Change Management POC List

Primary, secondary and tertiary CLEC and Qwest POCs will be included in the Qwest maintained POC list. It is the CLEC POC's responsibility to notify Qwest of any POC changes at http://www.qwest.com/wholesale/cmp/ppform.html. If Qwest makes a Primary POC change it will follow the process as described in Section 5.4.3. The list will be posted on the Qwest CMP Web site and may include other contacts.

2.4 Qwest CMP Responsibilities

2.4.1 CMP Manager

The Qwest CMP Manager is the Qwest Product/Process POC and is responsible for properly processing submitted CRs, conducting the Monthly CMP Product/Process Meeting, assembling and distributing the meeting distribution package, and ensuring minutes are written and distributed in accordance with the agreed-upon timeline.

The Qwest CMP Manager is the Qwest Systems POC and is responsible for properly processing submitted CRs, conducting the Monthly CMP Systems Meeting, assembling and distributing the meeting distribution package, and ensuring minutes are written and distributed in accordance with the agreed-upon timeline. The CMP Manager also distributes the list of CRs eligible for prioritization to Qwest and the CLECs for ranking, tabulates the rankings, and forwards the resulting prioritization of the CRs to Qwest and the CLECs. In addition, the CMP Manager is responsible for coordinating the publication of the Qwest OSS Interface Release Calendar, as described in Section 6.0.

2.4.2 Change Request Project Manager (CRPM)

The Qwest CRPM manages CRs throughout the CMP CR lifecycle. The CRPM is responsible for obtaining a clear understanding of exactly what deliverables the CR originator requires to close the CR, arranging the CR clarification meetings and coordinating necessary Subject Matter Experts (SMEs) from within Qwest to respond to the CR, and coordinating the participation of the necessary SMEs in the discussions with the CLECs.

2.4.3 Escalation/Dispute Resolution Manager

The Escalation/Dispute Resolution Manager is responsible for managing escalations, disputes and postponements in accordance with the CMP Escalation, Dispute Resolution and Postponement Processes. (See Sections 14.0, 15.0 and 5.5)

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2.4.4 Implementation Obligations

When Qwest commits to make a change pursuant to CMP, Qwest will review and revise internal and external documentation, as needed, to ensure that the change is appropriately reflected. Qwest will conduct training to communicate the changes to all appropriate Qwest personnel so that they are made aware of relevant changes. If Sections 5.0, 7.0, 8.0 or 9.0 require notification of the change, such notification will be provided in accordance with that section and will include references to external Qwest documentation that will be modified to reflect the change, if applicable. All of the forgoing activities will take place by the implementation date of the change.

2.4.5 Adherence to this CMP

As a general rule, if a CLEC indicates that Qwest is not following this CMP, and Qwest agrees, Qwest will correct the situation by following the process. If Qwest has failed to follow this CMP for a particular change, and is not able to withdraw the change and follow the applicable process, then Qwest and CLECs must unanimously agree on a different manner to correct the situation. If Qwest and the CLECs attempt to, but do not agree that a process was not followed or cannot agree on a manner to correct the situation, any CLEC may pursue any appropriate process available in this CMP (e.g., production support, escalation, dispute resolution, oversight committee).

2.5 Method of Communication

The method of communication is e-mail with supporting information posted to the Web site when applicable (see Section 3.3 Qwest Wholesale CMP Web Site). Communications sent by e-mail resulting from CMP will include in the subject line "CMP". E-mail communications regarding document changes will include direct Web site links to the related documentation. All Notifications are sent as "mailouts" and are distributed to all those who subscribe to such notifications at http://www.qwest.com/wholesale/notices/cnla/maillist.html.

Redlined PCATs and Technical Publications associated with product, process, and systems changes will be posted to the Qwest CMP Document Review Web site, http://www.qwest.com/wholesale/cmp/review.html. For the duration of the agreed upon comment period as specified in this CMP, CLECs may submit comments on the proposed documentation change. At the Qwest CMP Document Review Web site, CLECs may submit their comments on a specific document by selecting the "Submit Comments" link associated with the document. The "Submit Comments" link will take CLECs to an HTML comment template. If for any reason the "Submit" button on the site does not function properly, CLECs may submit comments to cmpcomm@qwest.com. After the conclusion of the applicable CLEC comment period, Qwest will aggregate all CLEC comments with Qwest responses and distribute to all CLECs via Notification e-mail within the applicable period.

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In some instances, a CLEC or Qwest may wish to include proprietary information in a CR. To do this the CLEC or Qwest must identify the proprietary information with bracketed text, in all capitals, preceded and followed by the words "PROPRIETARY BEGIN" and "PROPRIETARY END," respectively. Qwest will blackout properly formatted proprietary information when the CR is posted to the CR Database and distributed in the CMP Monthly Meeting distribution packet.

If a CLEC or Qwest wishes to ask a question, submit a comment, or provide information that is of a proprietary nature, the CLEC or Qwest must communicate directly with the CMP Manager via e-mail, cmpcr@qwest.com. Such e-mails must have a subject line beginning with PROPRIETARY.

This CMP contains references to required notifications. Such references typically identify specific information that must be included in such notifications. Such information is not an exclusive list. Qwest will use reasonable efforts to include such other information in its possession that may be useful in aiding CLECs to understand the scope and purpose of the notification.

2.6 CMP Relationship with Management of Performance Indicator Definitions (PIDs)

Qwest Performance Indicator Definitions (PIDs) have been established through collaboration among Qwest, CLECs and state public utilities commissions in a forum known as the Regional Oversight Committee Technical Advisory Group (ROC TAG). This activity was performed in order to test Qwest's performance in connection with Qwest's application to obtain approval under Section 271 of the Telecommunications Act of 1996. The parties anticipate that the ROC TAG (or similar industry group separate from the CMP body) will continue in some form after approval of Qwest's Section 271 application. The parties expect that this industry group will be responsible for change management of the Qwest PIDs (the "PID Administration Group").

The parties acknowledge that the operation of PIDs may be impacted by changes to Qwest OSS Interfaces, products or processes that are within the scope of CMP. Conversely, Qwest OSS Interfaces, products or processes may be impacted by changes to, or the operation of, PIDs that are within the scope of the PID Administration Group. As a result, efficient operation of this CMP requires communication and coordination, including the establishment of processes, between the PID Administration Group and the CMP body.

The parties recognize that if an issue results from CMP that relates to the PIDs (e.g., Qwest denies a CR with reference to PIDs, discussion of PID administration is needed in order to implement a CR, etc.), any party to this CMP may take the issue to the PID Administration Group for discussion and resolution as appropriate under the procedures for that Group. At the time any party brings such an issue to the PID Administration Group, such party shall notify Qwest and Qwest will distribute an e-mail notification to the CMP body. Qwest shall also distribute to the CMP body all correspondence with the PID Administration Group relating to the

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issue at the time such correspondence is exchanged with the PID Administration Group (if Qwest is not copied on such correspondence, the involved CLEC will forward such correspondence to Qwest for distribution to the CMP body). Qwest or an interested CLEC will bring any resolution or recommendation from the PID Administration Group relating to such issues to the CMP body for consideration in resolving related CMP issues.

It is possible that the PID Administration Group will identify issues that relate to CMP. In that case, the CMP body would expect the PID Administration Group (or a party from that group) to bring such issues to the CMP body for resolution or a recommendation. Such issues may be raised in the form of a CR, but may be raised in a different manner if appropriate. Qwest or an interested CLEC will return to the PID Administration Group any resolution or recommendation from the CMP body on such issues. Qwest and CLECs participating in the PID Administration Group agree that they will propose, develop, and adopt processes for the PID Administration Group that will enable the coordination called for in this Section. One such process may include joint meetings, on an as needed basis, of the PID Administration Group and the CMP body to address issues that affect both groups.

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3.0 CHANGE MANAGEMENT PROCESS MEETINGS

Change Management Process meetings will be conducted on a regularly scheduled basis. The CMP Product/Process and Systems Meetings will be conducted on the same day of each month or on at least two (2) consecutive days on a monthly basis, unless other arrangements are agreed upon by the CLECs and Qwest. Meeting participants can choose to attend meetings in person or participate by conference call.

Meetings are held to review, manage the implementation of Product/Process and System changes, and address Change Requests. Qwest will review the status of all applicable Change Requests. The meeting may also include discussions of Qwest's OSS Interface Release Calendar.

CLEC's request for additional agenda items and associated materials must be submitted to Qwest at least five (5) business days by noon (MT) in advance of the meeting. Qwest is responsible for distributing the agenda and associated meeting materials and will be responsible for preparing, maintaining, and distributing meeting minutes. Attendees with any walk-on items should bring hard copy materials of the walk-on items to the meeting and should, at least two (2) hours prior to the meeting, provide copies of such materials electronically (soft copy) to the CMP Manager, cmpcr@qwest.com, for distribution to all parties.

All attendees, whether in person or by phone, must identify themselves and the company they represent.

Additional meetings may be held at the request of Qwest or any CLEC. Meeting notification must contain an agenda plus any supporting meeting materials. Notification for these meetings will be distributed at least five (5) business days prior to their occurrence. Qwest will record and distribute meeting minutes, unless otherwise noted in this CMP.

3.1 Meeting Materials (Distribution Package) for Monthly Change Management Process Meetings

Meeting materials will include the following information:

- Meeting Logistics
- Minutes from previous meeting
- Agenda
- Change Requests and responses, as applicable
  - New/Active
  - Updated
- Issues, Action Items Log and associated statuses
- Release Summary, as applicable

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- OSS Interface Release Calendar, as described in Section 6.0
- Date TBD Trouble Tickets, as described in Section 12.3
- Any other material to be discussed

Qwest will provide Meeting Materials (distribution package) electronically, by noon (MT), three (3) business days prior to the Monthly CMP Meeting. In addition, Qwest will provide hard copies of the distribution package at the Monthly CMP Meeting.

3.2 Meeting Minutes for Change Management Process Meetings

Qwest will take minutes. Qwest will summarize discussions in meeting minutes and include any revised documents such as issues, action items and statuses.

Minutes will be distributed to meeting participants for comments or revisions no later than five (5) business days by noon (MT) after the meeting. CLEC comments will be provided by noon (MT) two (2) business days after receiving draft minutes to the Qwest CMP Manager, cmpcr@qwest.com. Revised minutes, if CLEC comments are received, will be posted to the CMP Web site within nine (9) business days by noon (MT) after the meeting.

3.3 Qwest Wholesale CMP Web Site

To facilitate access to CMP documentation, Qwest will maintain CMP information on its Web site. The Web site should be easy to use and will be updated in a timely manner. The Web site will be a well organized central repository for CLEC notifications and CMP documentation. Active documentation, including meeting materials (distribution package), will be maintained on the Web site. Change Requests and notifications will be identified in accordance with the agreed upon naming conventions to facilitate ease of identification. Qwest will maintain closed and old versions of documents on the Web site's Archive page for 18 months before storing off line. Information that has been removed from the Web site can be obtained by contacting the Qwest CMP Manager, cmpcr@qwest.com. At a minimum, the CMP Web site will include:

- Current version of the Qwest Wholesale Change Management Process Document
- OSS Interface Release Calendar
- OSS Interface hours of availability
- Links to related Web sites, such as IMA EDI, IMA GUI, CEMR, Document Review and Notifications
- Change Request Form and instructions to complete form
- Submitted and open Change Requests and the status of each, including written responses to CLEC inquiries
- Meeting (formal and informal) information for Monthly CMP Meetings and interim meetings or conference calls, including descriptions of meetings and participants, agendas, minutes, sign-up forms, and schedules, if applicable
- Interactive CR Report

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- Meeting materials (distribution package)
- CLEC Notifications and associated requirements
- Directory to CLEC Notifications for the month
- Business rules, SATE test case scenarios Technical Specifications, and user guides will be provided via links on the CMP Web site
- Contact information for the CMP POC list, including CLEC, Qwest and other participants (with participant consent to publish contact information on Web page)
- Redlined PCAT and Technical Publications - see Section 2.5
- Instructions for receiving CMP communications – see Section 2.5

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4.0 TYPES OF CHANGE

A Change Request must be within the scope of CMP and will fall into one of the following classifications. Types of Changes apply to Systems and Product/Process.

4.1 Regulatory Change

A Regulatory Change is mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. Either the CLEC or Qwest may originate the Change Request.

4.2 Industry Guideline Change

An Industry Guideline Change implements Industry Guidelines. Either Qwest or the CLEC may originate the Change Request and these changes are subject to the same processes under this CMP as Qwest and CLEC Originated Changes. These industry guidelines are defined by:

- Alliance for Telecommunications Industry Solutions (ATIS) sponsored
- Ordering and Billing Forum (OBF)
- Local Service Ordering and Provisioning Committee (LSOP)
- Telecommunications Industry Forum (TCIF)
- Electronic Commerce Inter-exchange Committee (ECIC)
- Electronic Data Interchange Committee (EDI)
- American National Standards Institute (ANSI)

4.3 Qwest Originated Change

A Qwest Originated Change is originated by Qwest and does not fall within the changes listed above.

4.4 CLEC Originated Change

A CLEC Originated Change is originated by the CLEC and does not fall within the changes listed above.

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5.0 CHANGE REQUEST PROCESS

5.1 CLEC-Qwest OSS Interface Change Request Process

A CLEC or Qwest seeking to change an existing OSS Interface, to establish a new OSS Interface, or to retire an existing OSS Interface must submit a Change Request (CR). A Change Request originator will complete and e-mail a completed Change Request (CR) Form to the Qwest CMP Manager, cmpcr@qwest.com, in accordance with the instructions set forth in the Qwest Wholesale CMP Web site located at the following URL: http://www.qwest.com/wholesale/cmp/index.html.

The CR Process supports Regulatory, Industry Guideline, CLEC originated and Qwest originated changes. The process for Regulatory changes will be managed as described in Section 5.1.1, Section 5.1.2 and Section 5.1.3.

5.1.1 Regulatory Change Request

Qwest or any CLEC may submit Regulatory CRs. The party submitting a Regulatory CR must also include sufficient information to justify the CR being treated as a Regulatory CR in the Description of Change section of the CR Form. Such information must include specific references to regulatory or court orders or legislation as well as dates, docket or case numbers, page or paragraph numbers and the mandatory or recommended implementation dates, if any. All Regulatory CRs initially must be submitted as systems CRs, including when the Regulatory CR clearly is for a product/process change, and will be introduced at the Monthly CMP Systems Meeting. If the Regulatory CR originator seeks to establish that the CR should be implemented by a manual process, the originator must so indicate on the CR Form and include as much information supporting the application of the exception as practicable.

Qwest will send CLECs a notification when it posts Regulatory CRs to the Web site and identify when comments are due and when a vote is to be taken, as described below. Regulatory CRs will also be identified in the Monthly CMP Systems Meeting distribution package.

Not later than eight (8) business days prior to the Monthly CMP Systems Meeting, any party objecting to the classification of such CR as Regulatory must submit a statement to the CMP Manager, cmpcr@qwest.com, documenting reasons why the objecting party does not agree that the CR should be classified as a Regulatory change. Regulatory CRs may not be presented as walk-on items.

If Qwest or any CLEC has objected to the classification of a CR as Regulatory, that CR will be discussed at the next Monthly CMP Systems Meeting. At that meeting, Qwest and the CLECs will conduct a vote under Section 17.0 to determine whether there is unanimous agreement that the CR is a Regulatory change. If Qwest or any CLEC does not agree that the CR is Regulatory, the CR will be treated as a non-Regulatory CR and prioritized, if applicable, with the CLEC originated and Qwest originated CRs, unless and until the CR is declared to be Regulatory through the Dispute Resolution Process. (See Section 15.0) Final determination of

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CR type will be made by the CLEC and Qwest POCs at that Monthly CMP Systems Meeting, and documented in the meeting minutes.

5.1.2 Implementation of Regulatory CRs

As a general rule, a Regulatory Change will be implemented by mechanization unless all parties agree otherwise, as described below.

For each Regulatory CR, Qwest will provide a cost analysis for both a manual and a mechanized solution. The cost analyses will include a description of the work to be performed and any underlying estimates that Qwest has performed associated with those costs. Qwest will also provide an estimated Level of Effort expressed in terms of person hours required for the mechanized solution. The cost analyses will be based on factors considered by Qwest, which may include volume, number of CLECs, technical feasibility, parity with retail, or effectiveness/ feasibility of a manual process.

The Regulatory CR will be implemented by a manual solution if there is a Majority vote, as described in Section 17.0, at the Monthly CMP Systems Meeting in favor of one of the following exceptions.

A. The mechanized solution is not technically feasible.

or

B. There is a significant difference in the costs for the manual and mechanized solutions. Cost estimates will allow for direct comparisons between solutions using comparable methodologies and time periods.

Any party that desires to present information to establish an exception may do so at the Monthly Systems CMP Meeting when the implementation plan is presented.

Once a Regulatory CR has been agreed upon to be implemented by a manual solution, the CR will be, from that point forward, tracked as a product/process CR through the Monthly CMP Product/Process Meetings. (See Section 5.7)

If Qwest is unable to fully implement a mechanized solution in the first Release that occurs after the CMP participants agree that a change is a Regulatory CR, Qwest's implementation plan for the mechanized solution may include the short-term implementation of a manual work-around until the mechanized solution can be implemented. In that situation, a single systems Regulatory CR will be used for the implementation of both the manual and mechanized changes. Qwest will continue to work that Regulatory CR until the mechanized solution is implemented.

If a Regulatory CR is implemented by a manual process and later it is determined that a change in circumstance warrants a mechanized solution, Qwest or any CLEC may submit a new systems CR which must include evidence of the change in circumstance, such as an estimated

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volume increase or changes in technical feasibility, and the number of the CR that was implemented using a manual process. The CR originator may request that the new CR be treated as a Regulatory CR. If Qwest or any CLEC does not agree to treat the new CR as a Regulatory CR, it will be treated as a Qwest or CLEC originated change.

Any party that disagrees with the majority decision regarding Exceptions A and B may initiate the Dispute Resolution Process. (See Section 15.0)

5.1.3 Industry Guideline Change Request

Industry Guideline CRs will be submitted as Systems CRs, but if it is determined they should be implemented as a Product/Process change, the CR will follow the Crossover process as documented in Section 5.7. The party submitting the Industry Guideline CR must identify on the CR Form that the CR should be designated an Industry Guideline CR and identify the industry forum that recommended that change. The party submitting an Industry Guideline CR must also include sufficient information to justify the CR being treated as an Industry Guideline CR in the Description of Change section of the CR Form. Such information must include specific references to the industry forum issue or recommendation and the recommended implementation date, if any.

5.1.4 Systems Change Request Origination Process

If a CLEC or Qwest wants Qwest to change, introduce or retire an OSS Interface, the originator will e-mail a Change Request (CR) Form to the Qwest CMP Manager, cmpcr@qwest.com. No later than two (2) business days after Qwest receives the CR, the Qwest CMP Manager reviews the CR for completeness, and requests additional information from the CR originator, if necessary.

Once the CR is complete:

- The Qwest CMP Manager will assign a CR Number, and log the CR into the CMP database
- The Qwest CMP Manager sends acknowledgement of receipt to the CR originator and updates the CMP database.

Within two (2) days after acknowledgement:

- The CMP Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate Director responsible for the CR.
- The Qwest CMP Manager posts the valid CR to the CMP Web site via Qwest's interactive report. The report will contain the CR details, originator identity, assigned CRPM, assigned CR Number and, when practicable, the designated Qwest SME and associated Director.
- The CRPM obtains from the Director the names of the assigned Subject Matter Expert(s) (SME)
- The CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
  - Description of CR
  - Originating CLEC

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- Assigned CRPM contact information
- Assigned CR number
- Designated Qwest SMEs and associated director(s)
- Status of the CR (e.g., Submitted)

Within eight (8) business days after receipt of a complete CR, the CRPM coordinates and holds a clarification meeting with the CR originator and Qwest's SME(s). If the originator is not available within the above specified time frame, then the clarification meeting will be held at a mutually agreed upon time. Qwest may not provide a response to a CR until a clarification meeting has been held. The CR originator may invite representatives from other companies to participate on the clarification call. Such participation is not intended to replace the presentation of the CR at the Monthly CMP Meeting.

At the clarification meeting, Qwest and the originator will review the submitted CR, validate the intent of the originator's CR, clarify all aspects, identify all questions to be answered, and determine deliverables Qwest must produce in order to close the CR. The originator should provide, in the CR, as much detail as possible. After the clarification meeting has been held, the CRPM will document and issue meeting minutes within five (5) business days.

CRs received fourteen (14) calendar days prior to the next scheduled Monthly CMP Systems Meeting will be presented at that Monthly CMP Systems Meeting for clarification from all CLECs participating in the Monthly CMP Systems Meeting.

At the Monthly CMP Systems Meeting, the originator will present the CR and provide any business reasons for the CR. Items or issues identified during the previously held clarification meeting will be relayed. CLECs participating in the Monthly CMP Systems Meeting will be given the opportunity to comment on the CR and provide additional clarifications. If appropriate, Qwest's SME(s) will identify options and potential solutions to the CR. Clarifications and/or modifications related to the CR will be incorporated into the evaluation of the CR.

CRs that are not submitted fourteen (14) calendar days prior to the Monthly CMP Systems Meeting may be introduced at that Monthly CMP Systems Meeting as walk-on items. The Originating CLEC will present the CR and participating CLECs will be allowed to provide comments to the CR. Qwest will provide a status of the CR.

Qwest will develop a draft response based on the CR discussion at the Monthly CMP Systems Meeting. Prior to the next scheduled Monthly CMP Systems Meeting the CRPM will post responses to systems CRs to the CMP database. The response will be made available via the interactive reports and the distribution package for the Monthly CMP Systems Meeting. Qwest will conduct a walk through of the response and participating CLECs will be provided the opportunity to discuss, clarify and comment on Qwest's Response. Qwest's Responses will be either:

- "Accepted" (Qwest will implement the request) with position stated, or

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- "Denied" (Qwest will not implement the request) with basis for the denial and a detailed explanation, including reference to substantiating material. OSS Interface Change Request may be denied for one or more of the following reasons:
  - Technologically not feasible—a technical solution is not available
  - Regulatory ruling/Legal implications—regulatory or legal reasons prohibit the change as requested, or if the request benefits some CLECs and negatively impact others (parity among CLECs) (Contrary to ICA provisions)
  - Outside the Scope of the Change Management Process—the request is not within the scope of the Change Management Process (as defined in this CMP), seeks adherence to existing procedures, or requests for information
  - Economically not feasible—low demand, cost prohibitive to implement the request, or both
  - The requested change does not result in a reasonably demonstrable business benefit (to Qwest or the requesting CLEC) or customer service improvement

Qwest will not deny a CR solely on the basis that the CR involves a change to back-end systems. Qwest will apply these same concepts to CRs that Qwest originates. The Special Change Request Process (SCRP) (Section 10.4) may be invoked if a CR was denied as economically not feasible.

Based on the comments received from the Monthly CMP Systems Meeting, Qwest may revise its response and issue a revised draft response at the next Monthly CMP Systems Meeting.

If any CLEC does not accept Qwest's response, any CLEC may elect to escalate or dispute the CR in accordance with the agreed upon CMP Escalation Process or Dispute Resolution Process. (Sections 14.0 and 15.0) If the Originator does not agree with the determination to escalate or pursue dispute resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuing the CR Escalation upon providing written notification to the Qwest CMP Manager, cmpcr@qwest.com. The CR will be assigned an escalation suffix and remain an active CR. Qwest will note in the status history of the interactive reports that the CR has been escalated. However, the CR status will reflect the stage of the CR as it progresses through the CR lifecycle.

If any CLEC does not accept Qwest's response and does not intend to escalate or dispute at the present time, it may request Qwest to status the CR as 'Deferred.' The CR will remain as Deferred and any CLEC may re-activate the CR at a later date.

NOTE: For system CRs associated with Billing, CRs will likely be prioritized for a specific set of Qwest billing system implementation dates (referred in this document as a "Release" or "release") versus one specific release with a single implementation date which is the case for IMA and CEMR/MEDIACC. In the context of Billing prioritization and/or packaging, when "release" is referred to, the reference is to a specific set of billing system implementation dates.

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At the last Monthly CMP Systems Meeting before Prioritization, Qwest will facilitate the presentation of all CRs eligible for Prioritization. In order for a CR to be eligible for prioritization in the upcoming release, it must be presented at least one (1) month prior to the Prioritization Review meeting in accordance with Section 10.3.1. At this meeting Qwest will provide a high level estimate of the Level of Effort of each CR and the estimated total capacity of the Release. This estimate will be an estimate of the number of person hours required to incorporate the CR into the Release. Ranking will proceed, as described in Section 10.0, Prioritization. The results of the ranking will produce an Initial Prioritization List.

Pursuant to this CMP, Qwest may develop a temporary manual solution to a mechanized change identified in an active systems CR. In these situations, Qwest will open a second systems CR with the same number as the original CR and a "MN" suffix. Qwest will process this "MN" CR as a systems CR through its entire life cycle. During this time the original systems CR will remain open and follow the appropriate systems CR process. The temporary manual solution will remain available at least until closure of the associated systems CR. If possible, all or part of the temporary manual solution can be reintroduced in Production Support if a manual workaround is required. A new CR is not required to revert to the temporary manual solution.

5.2 CLEC-Qwest OSS Interface Change Request Lifecycle

A CLEC or Qwest may elect to withdraw a CR that has been prioritized for an OSS Interface Release, in accordance with Section 10.3.5. Based on the Initial Prioritization List, Qwest will begin its development cycle that includes the milestones listed below.

5.2.1 Business and Systems Requirements

Qwest engineers define the business and functional specifications during this phase. The specifications are completed on a per candidate basis in priority order. During business and system requirements, any candidates which have affinities and may be more efficiently implemented together will be discussed. Candidates with affinities are defined as candidates with similarities in functions or software components. Qwest will present, at the Monthly CMP Systems Meeting, any complexities, changes in candidate size, or other concerns that may arise during business or system requirements, which would impact the implementation of the candidate.

During the business and systems requirement efforts, CRs may be modified or new CRs may be generated (by CLECs or Qwest), with a request that the new or modified CRs be considered for addition to the Initial Prioritization List (late added CRs). If there is a unanimous votes (see Section 17.0) to consider the late added CRs for addition to the Initial Prioritization List, Qwest will size the CR's requirements work effort. If the requirements work effort for the late added CRs can be completed by the end of system requirements, the candidate list and the new CRs will be prioritized by CLECs in accordance with the agreed upon Ranking of Later Added CR process (see Section 10.3.4). If the requirements work effort for the late added CRs cannot be completed by the end of system requirements, the CR will not be eligible for the Release and will be returned to the pool of CRs that are available for prioritization in the next OSS Interface

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Release. If packaging has already been presented as described in 5.2.2, any party seeking to submit a late-added CR must follow the Exception process.

5.2.2 Packaging

At the conclusion of system requirements, Qwest will present packaging option(s) for implementing the release candidates, including a package of only the prioritized candidates in order. Packaging options are defined as different combinations of candidates proposed for continuing through the next stage of development. Packaging options may not exist for the Release; *i.e.*, there may only be one straightforward set of candidates to continue working through the next stage of development. Options may be identified due to:

- affinities in candidates
- resource constraints which prevent some candidates from being implemented but allow others to be completed

Qwest will provide an updated estimate of the Level of Effort for each CR and the estimated total capacity of the Release. If more than one option is presented, a vote will be held within two (2) days after the meeting on the options. The packaging option with the largest number of votes will continue through the design phase of the development cycle.

5.2.3 Design

Qwest engineers define the architectural and code changes required to complete the work associated with each candidate. The design work is completed on the candidates, which have been packaged.

5.2.4 Commitment

After design, Qwest will present a commitment list of CRs that can be implemented. Qwest will provide an updated Level of Effort for each CR and the estimated total capacity of the Release. These candidates become the committed candidates for the Release.

5.2.5 Code & Test

Qwest engineers will perform the coding and testing required by Qwest to complete the work associated with the committed candidates. The code is developed and baselined before being delivered to system test. A system test plan (system test cases, costs, schedule, test environment, test data, etc.) is completed. The system is tested for meeting business and system requirements, certification is completed on the system readiness for production, and pre-final documentation is reviewed and baselined. If, in the course of the code and test effort, Qwest determines that it cannot complete the work required to include a candidate in the planned Release, Qwest will discuss options with the CLECs in the next Monthly CMP Systems Meeting. Options can include either the removal of that candidate from the list or a postponement in the implementation date to incorporate that candidate. If the candidate is removed from the list, Qwest will also advise the CLECs whether or not the candidate could

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become a candidate for the next Point Release, with appropriate disclosure as part of the current Major Release of the OSS Interface. Alternatively, the candidate will be returned to the pool of CRs that are available for prioritization in the next OSS Interface Release.

5.2.6 Deployment

During the deployment phase, Qwest representatives from the business and operations review and agree the system is ready for full deployment. Qwest deploys the Release and initiates and conducts production support .

When Qwest has completed development of the OSS Interface change, Qwest will release the OSS Interface functionality into production for use by the CLECs.

Upon implementation of the OSS Interface Release, the CRs will be updated to CLEC test and presented for closure at the next Monthly CMP Systems Meeting.

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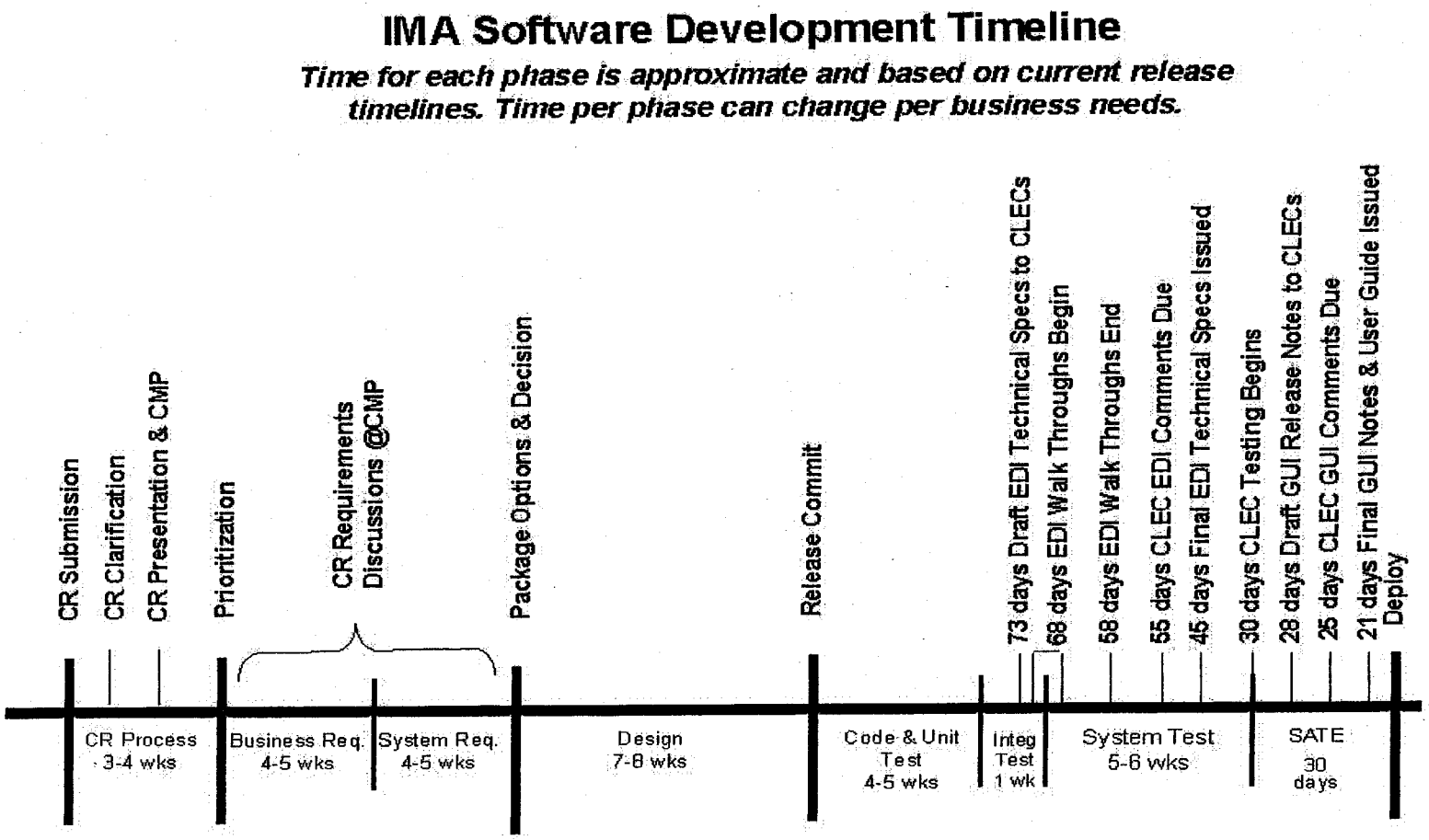
Figure 1: IMA Software Development Timeline



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5.3 CLEC Originated Product/Process Change Request Process

If a CLEC wants Qwest to change a product/process, the CLEC e-mails a Change Request (CR) Form to the Qwest CMP Manager, cmpcr@qwest.com. No later than two (2) business days after Qwest receives the CR:

- The Qwest CMP Manager reviews the CR for completeness, and requests additional information from the CR originator, if necessary
- The Qwest CMP Manager assigns a CR Number and logs the CR into the CMP database
- The Qwest CMP Manager sends acknowledgment of receipt to the CR originator and updates the CMP Database

Within two (2) business days after acknowledgement:

- The Qwest CMP Manager posts the detailed CR report to the CMP Web site
- The CMP Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate Director responsible for the CR
- The CRPM obtains from the Director the names of the assigned Subject Matter Expert(s) (SME)
- The CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
  - Description of CR
  - Originator (*i.e.*,CLEC name)
  - Assigned CRPM contact information
  - Assigned CR number
  - Designated Qwest SMEs and associated director(s)
  - Status of the CR (e.g, Submitted)

Within eight (8) business days after receipt of a complete CR, the CRPM coordinates and holds a clarification meeting with the Originating CLEC and Qwest's SMEs. If the originating CLEC is not available within the above specified time frame, then the clarification meeting will be held at a mutually agreed upon time. Qwest will not provide a response to a CR until a clarification meeting has been held. The CR originator may invite representatives from other companies to participate on the clarification call. Such participation is not intended to replace the presentation of the CR at the Monthly CMP Meeting.

At the clarification meeting, Qwest and the Originating CLEC will review the submitted CR, validate the intent of the Originating CLEC's CR, clarify all aspects, identify all questions to be answered, and determine deliverables to be produced. After the clarification meeting has been held, the CRPM will document and issue meeting minutes within five (5) business days. Qwest's SME will internally identify options and potential solutions to the CR.

CRs received fourteen (14) calendar days prior to the next scheduled Monthly CMP Product/Process Meeting will be presented at that Monthly CMP Product/Process Meeting. CRs that are not submitted by the above specified cut-off date may be presented at that Monthly CMP Product/Process Meeting as a walk-on item with current status. The Originating

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CLEC will present the CR and provide any business reasons for the CR. Items or issues identified during the previously held clarification meeting will be relayed. Participating CLECs will be given the opportunity to comment on the CR and subsequent clarifications. If appropriate, Qwest's SME(s) will identify options and potential solutions to the CR. Clarifications and/or modifications related to the CR will be incorporated into the evaluation of the CR. Subsequently, Qwest will develop a draft response based on the discussion from the Monthly CMP Product/Process Meeting. Qwest's response will be:

- "Accepted" (Qwest will implement the CLEC request) with position stated, or
- "Denied" (Qwest will not implement the CLEC request) with basis for the denial and a detailed explanation, including reference to substantiating material. CLEC originated Product/Process Change Request may be denied for one or more of the following reasons:
  - Technologically not feasible—a technical solution is not available
  - Regulatory ruling/Legal implications—regulatory or legal reasons prohibit the change as requested, or if the request benefits some CLECs and negatively impact others (parity among CLECs) (Contrary to ICA provisions)
  - Outside the Scope of the Change Management Process—the request is not within the scope of the Change Management Process (as defined in this CMP), seeks adherence to existing procedures, or requests for information
  - Economically not feasible—low demand, cost prohibitive to implement the request, or both
  - The requested change does not result in a reasonably demonstrable business benefit (to Qwest or the requesting CLEC) or customer service improvement

Qwest will not deny a CR solely on the basis that the CR involves a change to the back-end systems. Qwest will apply these same concepts to CRs that Qwest originates. SCRP may be invoked if a CR was denied due to Economically not feasible.

At least one (1) week prior to the next scheduled Monthly CMP Product/Process Meeting, the CRPM will have the response posted to the Web, added to the CMP Database, and will notify all CLECs via e-mail.

All Qwest Responses will be presented at the next scheduled Monthly CMP Product/Process Meeting. Qwest will conduct a walk through of its Response. Participating CLECs will be provided the opportunity to discuss, clarify and comment on Qwest's Response.

Based on the comments received from the Monthly CMP Product/Process Meeting, Qwest may revise its Response and issue a modified Response at the next Monthly CMP Product/Process Meeting. Within ten (10) business days after the Monthly CMP Product/Process Meeting, Qwest will notify the CLECs of Qwest's intent to modify its Response.

If the CLECs do not accept Qwest's Response, any CLEC can elect to escalate or dispute the CR in accordance with the agreed upon CMP Escalation Process or Dispute Resolution Process. (See Sections 14.0 and 15.0) If the originating CLEC does not agree with the determination to escalate or pursue dispute resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuing the CR upon providing written

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notification to the Qwest CMP Manager, cmpcr@qwest.com. Qwest will note in the status history of the interactive reports that the CR has been escalated. However, the CR status will reflect the stage of the CR as it progresses through the CR lifecycle.

If the CLECs do not accept Qwest's Response and do not intend to escalate or dispute at the present time, they may request Qwest to status the CR as Deferred. The CR will remain as Deferred and CLECs may reactivate the CR at a later date.

The CLECs' acceptance of Qwest's Response may result in:

- The Response answered the CR and no further action is required
- The Response provided an implementation plan for a product/process to be developed
- Qwest Denied the CLEC CR and no further action is required by CLEC

5.3.1 Implementation Notification

If the CLECs have accepted Qwest's response, Qwest will provide notice of planned implementation as follows.

Prior to implementing a CLEC originated product/process CR Qwest must notify the CLECs of the pending change. Qwest will issue such notifications at the time it intends to implement a CLEC originated change (in whole or in part). It is possible that more than one such notification will be issued in order to fully address the CLEC requested change. Such notifications may be issued during CLEC Test and may continue to be issued until the CLEC initiated CR is closed. These notifications will adhere to the notification standards for Level 1, Level 2, and Level 3 detailed in Section 5.4 (Qwest Originated Product/Process Changes). If the change is not specifically captured in the existing Level categories, or if the change is captured in the Level 4 categories, Qwest will follow the Level 3 notification schedule.

Finally, the CR will be closed when CLECs determine that no further action is required for that CR.

5.4 Qwest Originated Product/Process Changes

The following defines five levels of Qwest originated product/process changes and the process by which Qwest will originate and implement these changes. None of the following shall be construed to supersede timelines or provisions mandated by federal or state regulatory authorities, certain CLEC facing Web sites (e.g., ICONN and Network Disclosures) or individual interconnection agreements. Each notification will state that it does not supercede individual interconnection agreements. The lists of change categories under each level provided below are exhaustive/finite but may be modified by the process set forth in Section 2.1. Qwest will utilize these lists when determining the disposition level to which new changes will be categorized. The changes that go through these processes are not changes to OSS Interfaces. Level 1-4 changes under this process will be tracked and differentiated by level in the History Log for the affected documents.

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5.4.1 Level 0 Changes

Level 0 changes are defined as changes that do not change the meaning of documentation and do not alter CLEC operating procedures. Level 0 changes are effective immediately without notification.

Level 0 Change Categories are:

- Font and typeface changes (e.g., bold to un-bold or bold to italics)
- Capitalization
- Spelling corrections and typographical errors other than numbers that appear as part of an interval or timeframe
- Hyphenation
- Acronym vs. non-acronym (e.g., inserting words to spell out an acronym)
- Symbols (e.g., changing bullets from circles to squares for consistency in document)
- Word changes from singular to plural (or vice versa) to correct grammar
- Punctuation
- Changing of a number to words (or vice versa)
- Changing a word to a synonym
- Contact personnel title changes where contact information does not change
- Alphabetizing information
- Indenting (left/right/center justifying for consistency)
- Grammatical corrections (making a complete sentence out of a phrase)
- Corrections to apply consistency to product names (i.e., "PBX - Resale" changed to "Resale - PBX")
- Moving paragraphs/sentences within the same section of a document to improve readability
- Hyperlink corrections within documentation
- Removing unnecessary repetitive words in the same paragraph or short section.

For any change that Qwest considers a Level 0 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

5.4.1.1 Level 0 Process/Deliverables

For Level 0 changes, Qwest will not provide a notification, Web change form, or History Log to CLECs. Changes to the documentation will be updated and posted immediately.

5.4.2 Level 1 Changes

Level 1 changes are defined as changes that do not alter CLEC operating procedures or changes that are time critical corrections to a Qwest product/process. Time critical corrections may alter CLEC operating procedures, but only if such Qwest product/process has first been implemented through the appropriate level under CMP. Level 1 changes are effective immediately upon notification.

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Level 1 Change Categories are:

- Time critical corrections to information that adversely impacts CLECs' ability to conduct business with Qwest
- Corrections/clarifications/additional information that do not change the product/process
- Corrections to synch up related PCAT documentation with the primary PCAT documentation that was modified through a higher level change (notification needs to include reference to primary PCAT documentation)
- Document corrections to synch up with existing OSS Interfaces documentation (notification needs to include reference to OSS Interfaces documentation)
- Process options with no mandatory deadline, that do not supercede the existing processes and that do not impose charges, regardless of whether the CLEC exercises the option
- Modifications to Frequently Asked Questions that do not change the existing product/process
- Re-notifications issued within one hundred and eighty (180) calendar days after initial notification (notification will include reference to date of initial notification or, if not available, reference to existing PCAT)
- Regulatory Orders that mandate a product/process change to be effective in less than twenty-one (21) days
- Training information (note: if a class is cancelled, notification is provided two (2) weeks in advance)
- URL changes with redirect link

For any change that Qwest considers a Level 1 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

5.4.2.1 Level 1 Process/Deliverables

For Level 1 changes, Qwest will provide a notification to CLECs. Level 1 notifications will state the disposition level 1, description of change, that changes are effective immediately, that there is no comment cycle and will advise CLECs to contact the CMP Manager by e-mail at cmpcr@qwest.com immediately if the change alters the CLECs' operating procedures and requires Qwest's assistance to resolve. Qwest will respond to the CLEC, within one (1) business day, and work to resolve the issue. Possible resolutions may include withdrawal of the change, re-notification under a different level or creation of a new category of change under a different level. In addition, Qwest will provide the following for PCAT and Non-FCC Technical Publication ("Tech Pub") changes:

- The complete red-lined PCAT or Non-FCC Tech Pub will be available for review in the Product/Process Document Review Archive section of the CMP Web site, http://www.uswest.com/wholesale/cmp/review_archive.html,
- A History Log that tracks the changes

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5.4.3 Level 2 Changes

Level 2 changes are defined as changes that have minimal effect on CLEC operating procedures. Qwest will provide notification of Level 2 changes at least twenty-one (21) calendar days prior to implementation.

Level 2 Change Categories are:

- Contact Information updates excluding time critical corrections (Expedites and Escalations Overview (http://www.qwest.com/wholesale/clecs/exescover.html), Wholesale Customer Contacts (http://www.qwest.com/wholesale/clecs/escalations.html), Technical Escalations Contact List (http://www.qwest.com/wholesale/systems/productionsupport.html), CMP Points of Contact (POCs, Qwest POC changes only) (http://www.qwest.com/wholesale/cmp/poc.html))
- Changes to a form that do not introduce changes to the underlying process
- Changes to eliminate/replace existing Web functionality will be available for twenty-one (21) days until comments are addressed. (Either a demo or screen shot presentation will be available at the time of the notification for evaluation during the twenty-one (21) day cycle.)
- Removal of data stored under an archive URL
- Elimination of a URL re-direct
- Addition of new Web functionality (e.g., CNLA)
- Re-notifications issued one hundred and eighty (180) calendar days or more after the initial notification (notification will include reference to date of initial notification or, if not available, reference to existing PCAT)
- Documentation concerning existing processes/products not previously documented
- Changes to manually generated notifications normally transmitted to CLECs through their OSS Interfaces that are made to standardize or clarify, but do not change the reasons for, such notifications
- LSOG/PCAT documentation changes associated with new OSS Interface Release documentation resulting from an OSS Interface CR
- Reduction to an interval in Qwest's SIG

For any change that Qwest considers a Level 2 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

5.4.3.1 Level 2 Process/Deliverables

For Level 2 changes, Qwest will provide a notification to CLECs. Level 2 notifications will state the disposition level 2, description of change, proposed implementation date, and CLEC/Qwest comment cycle timeframes. In addition to the notification, any documentation changes required to PCATs and Non-FCC Tech Pubs will be red-lined and available for review in the Document Review section of the CMP Web site, http://www.qwest.com/wholesale/cmp/review.html, commonly known as the Document Review site. In the Document Review site, a comment button will be available next to the document to allow CLECs to provide comments. For Level 2 changes that do not impact PCATs or Non-FCC Tech Pubs, a comments link will be provided within the notification for comments.

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Qwest must provide initial notification of Level 2 changes at least twenty-one (21) calendar days prior to implementation and adhere to the following comment cycle:

- CLECs have seven (7) calendar days following initial notification of the change to provide written comments on the notification.
- Qwest will reply to CLEC comments no later than seven (7) calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date. In the event there are extenuating circumstances, (e.g., requested change requires significant research, information is required from national standards body or industry (e.g., Telcordia)), Qwest's response will indicate the course of action Qwest is taking and Qwest will provide additional information when available. Once the information is available, Qwest will provide a notification and any available updated documentation (e.g., Tech Pubs, PCATs) at least seven (7) calendar days prior to implementation. If Qwest extends the comment response period, Qwest will present an update on the response at each Monthly CMP Product/Process Meeting until final notification is distributed.
- Qwest will implement no sooner than twenty-one (21) calendar days from the initial notification.

CLECs may provide General comments regarding the change (e.g., clarification, request for modification, request to change the disposition level of a noticed change). Comments must be provided during the comments cycle as outlined for level 2 changes.

If a CLEC requests to change the disposition level of a noticed change, CLECs and Qwest will discuss such requests at the next Monthly CMP Product/Process Meeting. In the event that timing doesn't allow for discussion at the upcoming Monthly CMP Product/Process Meeting, Qwest will call a special ad hoc meeting to address the request. If the parties are not able to reach agreement on any such request, CLECs and Qwest will take a vote in accordance with Section 17.0. The result will be determined by the Majority. If the disposition level of a change is modified, from the date of the modification forward, such change will proceed under the modified level with notifications and timelines agreed to by the participants.

For general comments, Qwest will respond to comments and provide a final notification of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and Non-FCC Tech Pubs to CLECs and implement the change(s) according to the timeframes put forth above. If there are no CLEC comments, a final notification will not be provided and the changes will be effective according to the date provided in the original notification.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate or pursue dispute resolution in accordance with the agreed upon CMP Escalation Process or Dispute Resolution Process. (See Sections 14.0 and 15.0)

5.4.4 Level 3 Changes

Level 3 changes are defined as changes that have moderate effect on CLEC operating procedures and require more lead-time before implementation than Level 2 changes. Qwest

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will provide initial notification of Level 3 changes at least thirty-one (31) calendar days prior to implementation.

Level 3 Change Categories are:

- NC/NCI code changes
- Adding of new features to existing products (excluding resale)
- Customer-facing Center hours and holiday schedule changes
- Modify/change existing manual process
- Expanding the availability and applicability or functionality of an existing product or existing feature (excluding resale)
- Regulatory Orders that mandate a product/process change to be effective in twenty-one (21) days or more

For any change that Qwest considers a Level 3 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

5.4.4.1 Level 3 Process/Deliverables

For Level 3 changes, Qwest will provide a notification to CLECs. Level 3 notifications will state the disposition level 3, description of change, proposed implementation date, and CLEC/Qwest comment cycle timeframes. Level 3 notifications will only include Level 3 changes and any dependent Level 1 and Level 2 changes. Level 3 notifications of Tech Pub changes may include notification of any Level 1, Level 2 and Level 3 change.

For a Level 3 notification that Qwest believes should fall under a different Level, Qwest will propose the Level under which it believes that change should be processed. CLECs and Qwest will discuss the proposal in the next Monthly CMP Product/Process Meeting. In addition to the notification, any documentation changes required to PCATs and Non-FCC Tech Pubs will be red-lined and available for review in the Document Review section of the CMP Web site, http://www.qwest.com/wholesale/cmp/review.html, commonly known as the Document Review site. In the Document Review site, a comment button will be available next to the document to allow CLECs to provide written comments. For Level 3 changes that do not impact PCATs or Non-FCC Tech pubs, a link will be provided within the notification for comments.

Qwest will provide initial notification of Level 3 changes at least thirty-one (31) calendar days prior to implementation and adhere to the following comment cycle:

- CLECs have fifteen (15) calendar days following initial notification of the change to provide written comments on the notification
- Qwest will reply to CLEC comments no later than fifteen (15) calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date. In the event there are extenuating circumstances, (e.g., requested change requires significant research, information is required from national standards body or industry (e.g., Telcordia)), Qwest's response will indicate the course of action Qwest is taking and Qwest will provide additional information when available. Once the information is available, Qwest will provide a notification and any available updated documentation (e.g.,

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Tech Pubs, PCATs) at least fifteen (15) calendar days prior to implementation. If Qwest extends the comment response period, Qwest will present an update on the response at each Monthly CMP Product/Process Meeting until final notification is distributed.

- Qwest will implement no sooner than fifteen (15) calendar days after providing the response to CLEC comments. For example, if there are no CLEC comments, Qwest may send out a final notification on the first day following the CLEC cut-off for comments (day 16 after the initial notification). Thus, implementation would be thirty-one (31) days from the initial notification. However, if Qwest does not respond to the CLEC comments until the 15th day after the CLEC cut-off for comments, the earliest possible implementation date would be forty-five (45) calendar days from the initial notification.

CLEC comments must be provided during the comment cycle as outlined for Level 3 changes. Comments may be one of the following:

- General comments regarding the change (e.g., clarification, request for modification)
- Request to change disposition level of a noticed change
  - If the request is for a change to Level 4, the request must include substantive information to warrant a change in disposition (e.g., business need, financial impact).
  - A request to change disposition level to a Level 0, Level 1 or Level 2 is not required to include substantive information to warrant a change.
- Request for postponement of implementation date, or effective date

For general comments, Qwest will respond to comments and provide a final notification of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and Non-FCC Tech Pubs available to CLECs and implement the change(s) according to the timeframes put forth above.

CLECs and Qwest will discuss requests to change the disposition level of notified changes at the next Monthly CMP Product/Process Meeting. In the event that timing doesn't allow for discussion at the upcoming Monthly CMP Product/Process Meeting, Qwest will call a special ad hoc meeting to address the request. If the parties are not able to reach agreement on any such request, CLECs and Qwest will take a vote in accordance with Section 17.0. The result will be determined by the Majority. If the disposition level of a change is modified, from the date of the modification forward, such change will proceed under the modified level with notifications and timelines agreed to by the participants. Except that, within five (5) business days after the disposition level is changed to a Level 1, Qwest will provide a Level 1 notification.

For a request for postponement of a Level 3 change, Qwest will follow the procedures as outlined in Section 5.5 of this document.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate or pursue dispute resolution in accordance with the agreed upon CMP Escalation or Dispute Resolution procedures. (See Sections 14.0 and 15.0)

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5.4.5 Level 4 Changes

Level 4 changes are defined as changes that have a major effect on existing CLEC operating procedures or that require the development of new procedures. Level 4 changes will be originated using the CMP CR process and provide CLECs an opportunity to have input into the development of the change prior to implementation.

Level 4 Change Categories are:

- New products, features, services (excluding resale)
- Increase to an interval in Qwest's Service Interval Guide (SIG)
- Changes to CMP
- New PCAT/Tech Pub for new processes
- New manual process
- Limiting the availability and applicability or functionality of an existing product or existing feature
- Addition of a required field on a form excluding mechanized forms that are changed through an OSS Interface CR (See Section 5.1)

For any noticed change that Qwest considers a Level 4 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification with an indication in the notification that Qwest believes the change should be a Level 4 change.

5.4.5.1 Level 4 Process/Deliverables

Qwest will submit a completed Change Request no later than fourteen (14) calendar days prior to the Monthly CMP Product/Process Meeting. At a minimum, each Change Request will include the following information:

- A description of the proposed change
- A proposed implementation date (if known)
- Indication of the reason for change (e.g., regulatory mandate)
- Basis for disposition of Level 4

Within two (2) business days from receipt of the CR:

- The Qwest CMP Manager assigns a CR Number and logs the CR into the CMP Database
- The Qwest CMP Manager sends acknowledgment of receipt to the CR originator and updates the CMP Database

Within two (2) business days after acknowledgement:

- The Qwest CMP Manager posts the detailed CR report to the CMP Web site
- The CMP Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate Director responsible for the CR
- The CRPM identifies the CR Subject Matter Expert (SME) and the SME's Director.
- The CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:

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- Description of CR
- Assigned CRPM
- Assigned CR number
- Designated Qwest SME(s) and associated director(s)
- Status of the CR (e.g., Submitted)

Qwest will present the Change Request at the Monthly CMP Product/Process Meeting. The purpose of the presentation will be to:

- Clarify the proposal with the CLECs
- Confirm the disposition level of the Change (see below).
- Propose suggested input approach (e.g., a 2 hour meeting, 4 meetings over a two week period, etc.), and obtain agreement for input approach
- Confirm deadline, if change is mandated
- Provide proposed implementation date, if applicable

At the Monthly CMP Product/Process Meeting, the parties will discuss whether to treat the Change Request as a Level 4 change. If the parties agree, the Change Request will be reclassified as a Level 0, 1, 2 or 3 change, and the change will follow the process set forth above for Level 0, 1, 2, or 3 changes, as applicable. If the parties do not agree to reclassify the Change Request as a Level 0, 1, 2 or 3 change, the following process will apply:

- The parties will develop a process for Qwest to obtain CLEC input into the proposed change. Examples of processes for input include, but are not limited to, one-day conferences, multi-day conferences, or written comment cycles.
- After completion of the input cycle, as defined during the Monthly CMP Product/Process Meeting, Qwest will modify the CR, if necessary, and design the solution considering all CLEC input.
- For Level 4 changes, when the solution is designed and all documentation is available for review, a notification of the planned change is provided to the CLECs. Level 4 notifications will only include Level 4 changes and any dependent Level 1, Level 2 changes, and Level 3 changes. Level 4 notifications of Tech Pub changes may include notification of any Level 1, Level 2, Level 3, and Level 4 change. This notification will be provided at least thirty one (31) calendar days prior to implementation. The notification will contain reference to the original CR, proposed implementation date, and the CLEC/Qwest comment cycle. In addition, any documentation changes required to PCATs and Non-FCC Tech Pubs will be red-lined and available for review in the Document Review site with a Comment button available to provide written comments. For Level 4 changes that do not impact PCATs or Non-FCC Tech Pubs, a comments link will be provided within the notification.
- CLECs have fifteen (15) calendar days following notification of the planned change to provide written comments on the notification
- Qwest will reply to CLEC comments no later than fifteen (15) calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date. In the event there are extenuating circumstances, (e.g., requested change requires significant research, information is required from national standards body or industry (e.g., Telcordia)), Qwest's response will indicate the course of action Qwest is

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taking and Qwest will provide additional information when available. Once the information is available Qwest will provide a notification and any available updated documentation (e.g., Tech Pubs, PCATs) at least fifteen (15) calendar days prior to implementation. If Qwest extends the comment response period, Qwest will present an update on the response at each Monthly CMP Product/Process Meeting until final notification is distributed.

- Qwest will implement no sooner than fifteen (15) calendar days after providing the response to CLEC comments. For example, if there are no CLEC comments, Qwest may send out a final notification on the first day following the CLEC cut-off for comments (day 16 after the initial notification). Thus, implementation would be thirty one (31) days from the initial notification. However, if Qwest does not respond to the CLEC comments until the 15th day after the CLEC cut-off for comments, the earliest possible implementation date would be forty five (45) calendar days from the initial notification.

CLEC comments must be provided during the comment cycle as outlined for Level 4. CLEC comments may be one of the following:

- General comments regarding the change (e.g., clarification, request for modification)
- Request for postponement of implementation, or effective date for which comments are being provided.

For general comments, Qwest will respond to comments and provide a final notification of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and Non-FCC Tech Pubs available to CLECs and implement the change(s) according to the timeframes put forth above.

For a request for postponement of a Level 4 change, Qwest will follow the procedures as outlined in Section 5.5 of this document.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate the CR or pursue the Dispute Resolution Process in accordance with Section 15.0.

5.5 Postponement and Arbitration of a Product/Process Change

A CLEC may request that Qwest postpone the implementation of a Qwest-originated or CLEC-originated product/process change in accordance with this section.

5.5.1 Timeframe for Request for Postponement

A CLEC invokes the Postponement Process in accordance with the conditions and timeframes specified below:

5.5.1.1 Qwest-Originated Product /Process Changes

For Qwest-originated Level 3 or Level 4 product/process changes, if a CLEC intends to invoke the postponement process, it must do so during the final CLEC comment period.

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If, however, in its response to CLEC comments Qwest revises the proposed change and that revision materially impacts a CLEC, a CLEC may invoke the postponement process within five (5) business days after the issuance of Qwest's final notification of the change.

5.5.1.2 CLEC-Originated Product/Process Changes

For CLEC-originated product/process changes, if a CLEC intends to invoke the postponement process, it must do so during the CLEC comment period applicable to the notification called for in Section 5.3.1.

If, however, in its response to CLEC comments Qwest revises the proposed change and that revision materially impacts a CLEC, a CLEC may invoke the postponement process within five (5) business days after the issuance of Qwest's final notification of the change.

5.5.1.3 A CLEC may Join or Oppose a Postponement Request

A CLEC may only join or oppose a postponement request if it submits a request to join or oppose the postponement request within two (2) business days after the issuance date of Qwest's notification to the CLECs that a postponement request has been received by Qwest.

5.5.2 Process for Initiating a Postponement Request

5.5.2.1 CLEC Initiates Postponement Request by E-mail

A request for postponement, a request to join a postponement request or opposition to a postponement request must be sent to the Qwest CMP Postponement e-mail address (cmpesc@qwest.com).

The subject line of the request must include:

- CLEC Company Name
- POSTPONEMENT
- Change Request (CR) number or Notification Subject Line and Notification Date as appropriate

5.5.2.1.1 Required Content for Request for Postponement

A CLEC may request that Qwest postpone implementation of all or part of the proposed change until the issue is resolved in CMP or until the dispute is resolved pursuant to the Dispute Resolution Process (Section 15.0). In its request for postponement, whether initiating or joining a postponement request, a CLEC shall provide the following information, if relevant:

- The basis for the request for a postponement;
- The extent of the postponement requested, including the portions of the proposed change to be postponed and length of requested postponement;
- The harm that the CLEC will suffer if the proposed change is not postponed, including the business impact on the CLEC if the proposed change is not postponed; and

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- Whether and how the CLEC alleges that the proposed change violates its interconnection agreement(s) or any applicable commission rules or any applicable law.

5.5.2.1.2 Additional Requirement for Request for Postponement Arising from Revision

If a CLEC requests a postponement because Qwest's response to CLEC comments includes a revision of the proposed change and that revision materially impacts a CLEC, such a request must contain a description of why Qwest's response affects the CLEC in a new or different way than the proposed change initially affected the CLEC, along with the information that would have been required if the CLEC submitted a request for postponement in its comments.

5.5.2.1.3 Opposition to a Postponement Request

If a CLEC wishes to oppose a postponement request, it must submit its opposition to a postponement request within the same time period that CLECs have to join a postponement request. Any opposition to a postponement request must include information responsive to the assertions made by the CLEC seeking postponement as called for in Section 5.5.2.1.1. For example, under Section 5.5.2.1.1, CLEC(s) seeking postponement must describe the harm it will suffer if the change is not postponed. In response to this assertion, a CLEC opposing a postponement request will state the harm it would suffer if Qwest does postpone the change.

5.5.2.2 Qwest will Work to Resolve CLEC Concerns

Following the receipt of a postponement request, Qwest will proactively work with the objecting CLEC(s) to resolve the concerns of the CLEC(s).

5.5.2.3 Qwest Acknowledges Receipt of Request and Notifies CLECs

Within two (2) business days after receipt of the postponement request, Qwest will acknowledge receipt of the postponement request or the request to join the postponement with an acknowledgment e-mail to the originator of the request. If the request does not contain the relevant information, as specified in Section 5.5.2.1.1, Qwest will notify the CLEC by the close of business on the following day, identifying and requesting information that was not originally included. When the postponement e-mail is complete, the acknowledgment e-mail will include:

- Date and time of receipt of postponement request
- Date and time of acknowledgment e-mail
- Qwest will give notification and post the postponement request and any associated responses on the CMP Web site within three (3) business days after receipt of the complete request or response.

5.5.3 Qwest's Determination of Postponement Request

The standard set forth in this section applies only to Qwest's postponement determination under this section and the arbitrator's determination under Section 5.5.4.5 and has no bearing on the standard applicable to any other review or determination.

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5.5.3.1 Standard for Determining whether to Postpone.

Qwest will postpone the implementation of the proposed change whenever Qwest reasonably determines that postponing the proposed change will prevent more harm or cost to the requesting and any joining CLECs than postponing the proposed change imposes harm or cost upon Qwest or any CLECs who oppose the postponement. Qwest will postpone the implementation of the proposed change if it is inconsistent with a requesting or joining CLEC's interconnection agreement, applicable commission rule or law.

Qwest will not postpone the implementation of the proposed change whenever Qwest reasonably determines that postponing the proposed change will impose more harm or cost upon Qwest or any CLECs who oppose the postponement than postponing the proposed change will prevent harm or cost to the CLECs supporting the postponement. Qwest will provide in its response notification that the proposed change will not be postponed.

5.5.3.2 Qwest's Response to Request for Postponement

If Qwest decides to postpone the proposed change, it will provide the following information in its response:

- The time period (not less than thirty (30) calendar days) for which the proposed change will be postponed;
- The CLECs for which the proposed change will be postponed; and
- Any other details of the postponement, including the portions of the proposed change to be postponed and the length of the postponement.

If Qwest decides not to postpone the proposed change, it will provide in its response:

- The reason the requested postponement is not being implemented;
- An explanation of the harm and cost evaluation; and
- How Qwest alleges that the proposed change is consistent with interconnection agreement(s) or any applicable commission rules or any applicable law.

5.5.3.3 30-day Postponement if Request is Denied

If Qwest does not grant the requested postponement, Qwest will not implement the objected-to proposed change for at least thirty (30) calendar days following notification to CLECs that Qwest will not postpone the proposed change.

5.5.4 Optional Arbitration Process for Interim Postponement of Disputed Changes while Dispute Resolution Proceeds

If Qwest does not postpone a proposed change and a CLEC has initiated Dispute Resolution proceedings (Section 15.0) with regard to the proposed change, the CLEC has the option to request a neutral arbitrator to determine whether Qwest must postpone implementation of that proposed change. This optional arbitration provides interim relief only and is limited to the question of whether Qwest must postpone implementation of the proposed change until the

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dispute or the postponement request is resolved under the Dispute Resolution process. The arbitrator's decision will have application in all of the states where the CLEC initiates Dispute Resolution proceedings on the issue. As decisions on the dispute or the postponement request are made in each state, such decisions will supersede the determination of the arbitrator for that state.

All references in Section 5.5.4 (including all subsections) to "CLEC" and "CLECs" include all CLECs who have submitted or joined requests for postponement of a proposed change, initiated Dispute Resolution proceedings and seek arbitration for the interim postponement of the same proposed change. There may be multiple CLECs seeking postponement of the same proposed change in any given state. Such CLECs will, to the greatest extent possible, cooperate with one another to select a single arbitrator to address the issue of interim postponement for a given state. In the event that one or more CLECs have initiated Dispute Resolution proceedings on the issue of interim postponement of the same proposed change in multiple states, such CLECs may agree to the use of a single arbitrator to address such issue for all such states.

References in Section 5.5.4 (including all subsections) to "parties" will include Qwest and all CLECs who have submitted or joined requests for postponement of the same proposed change, initiated Dispute Resolution proceedings and seek arbitration for the interim postponement of that proposed change. However, the reference to "all parties" in Section 5.5.4.1.1 means Qwest and all CLECs in CMP who have received proper notification, in accordance with Section 3.0, about selection of individuals for the Agreed Arbitrators List and participated in the selection discussions.

This optional arbitration process set forth below does not apply to any proceeding before a regulatory or other authority.

5.5.4.1 Selection of Arbitrator

If a CLEC chooses arbitration under this section, the parties shall select a neutral arbitrator by agreeing to an individual or by following the processes set forth below to select an arbitrator from an alternative dispute resolution organization.

5.5.4.1.1 Agreed Arbitrators List

Qwest and the CLECs may, by mutual agreement, develop a list of individual arbitrators to which all parties agree as an additional source for selection of a neutral arbitrator (Agreed Arbitrators List). Names of arbitrators may be added to the list at any time upon agreement of all parties. Qwest or any CLEC may strike an individual arbitrator from the Agreed Arbitrators List at any time, except that Qwest or any CLEC may not strike an arbitrator from the list while an arbitration initiated under this provision is pending before that arbitrator. If a CLEC chooses a name from the Agreed Arbitrators List, that individual will be the arbitrator.

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5.5.4.1.2 Alternative Dispute Resolution Organization

If a CLEC does not choose an individual arbitrator from the Agreed Arbitrators List, or if Qwest and CLECs do not otherwise agree on an individual arbitrator, then Qwest and the CLEC shall select a neutral arbitrator from any of the following pursuant to the process set forth below: Judicial Arbiter Group (JAG), American Arbitration Association (AAA), JAMS, or any other mutually agreeable alternative dispute resolution organization. Within two (2) business days after receipt of Qwest's acknowledgment e-mail, the CLEC shall advise the alternative dispute resolution organization and Qwest of the identity of the parties and the nature of the dispute and the CLEC shall acquire from JAG, AAA, JAMS, or other alternative dispute resolution organization as to which agreement is reached, a list of 5 potential arbitrators who have no apparent conflict of interest or any circumstances likely to affect their impartiality or independence and who have experience in handling general commercial disputes, along with a brief summary of each potential arbitrator's relevant background and experience. The CLEC shall forward the list to the specified Qwest contact as soon as practicable after it receives the list, along with the identity of the two of the five potential arbitrators the CLEC wishes to strike from the list. Within one business day after receipt of the list and indication of the potential arbitrators the CLEC has stricken, Qwest will respond to the CLEC contact with the two additional names Qwest wishes to strike from the list.

5.5.4.2 Initiating Postponement Arbitration

A CLEC initiates arbitration for interim postponement of Qwest's implementation of a proposed change under this provision by sending an e-mail to Qwest at cmpesc@qwest.com. The e-mail must include, at a minimum, the following:

- Subject line that includes "Postponement" and the CR [insert number] or Notification Subject Line
- The CLEC's contact person for matters relating to the postponement arbitration and method of communication (e.g., e-mail address or facsimile number)
- A statement that the CLEC desires to have a neutral arbitrator decide whether Qwest must postpone implementation of the change until the request for postponement is decided by the regulatory or other authority
- A copy of the documents that the CLEC filed with the Regulatory or other authority to initiate the dispute resolution
- The identity of the alternative dispute resolution organization or individual arbitrator the CLEC proposes to use

Within two (2) business days after receipt of the Request for Postponement Arbitration, Qwest shall respond with an e-mail acknowledging receipt of the Request for Postponement Arbitration. The e-mail must include, at a minimum, the following:

- A subject line that includes "Acknowledgment of Request for Postponement" and the CR [insert number] or Notification Subject Line
- Qwest's contact person for matters relating to the postponement arbitration and method of communication (e.g., e-mail address or facsimile number)

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- If the Request for Postponement Arbitration identifies an alternative dispute resolution organization other than those listed in Section 5.5.4.1.2 or individual other than those on the Agreed Arbitrators List, Qwest's acknowledgment will state whether it agrees to the use of that alternative dispute resolution organization or individual arbitrator and, if it does not agree, Qwest will identify an organization or individual arbitrator that appears on the Agreed Arbitrator List that it agrees to use.

Qwest and the CLEC shall communicate with one another regarding matters relating to the postponement arbitration through the contact person and by the method of communication designated in accordance with the process set forth above.

5.5.4.3 No Unilateral Communication with Arbitrator or Potential Arbitrator

Neither Qwest nor the CLEC, and no person acting on behalf of either Qwest or the CLEC, shall communicate unilaterally concerning the arbitration with the arbitrator or any potential arbitrator.

5.5.4.4 Scope of Authority of the Arbitrator

The arbitrator shall decide only the issue of whether Qwest must postpone implementation of the change. The arbitrator shall not have authority to award any damages or make any other determination outside this scope.

If the CLEC has initiated dispute resolution with regard to the same change in more than one state, a single arbitrator can decide the postponement issue for all states in which the CLEC has initiated dispute resolution proceedings regarding the same issue.

This arbitration option is not an exclusive remedy and does not preclude any CLEC from using appropriate state commission procedures, expedited or otherwise, to raise issues or seek a postponement.

5.5.4.5 Arbitrator's Decision

The arbitrator shall decide the issue upon written submissions. The CLEC and Qwest both shall submit their position statements to the arbitrator and to each other by e-mail or facsimile within one business day from the date on which agreement regarding the identity of the arbitrator is reached.

In determining whether Qwest must postpone implementation of a proposed change, the arbitrator must apply the standards set forth in Section 5.5.3.1.

The arbitrator must provide his/her decision to Qwest and the CLECs within five (5) business days after receipt of the parties' position statements. The arbitrator's decision must be in writing, signed by the arbitrator, and must include a brief summary of the basis for the decision.

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5.5.4.6 Effect of Arbitrator's Decision

The parties agree to abide by the arbitrator's decision regarding a postponement of implementation in the state in which the decision applies until the decision expires. If the arbitrator's decision applies to more than one state, the decision will expire on a state by state basis. Unless the parties agree otherwise, the arbitrator's decision expires in a state when the first of any of the following occurs in that state:

- The regulatory or other authority from whom the CLEC has requested a postponement rules on the postponement request; or
- The dispute resolution proceeding initiated by the CLEC regarding the proposed change is dismissed, withdrawn, or otherwise concluded without a ruling on the CLEC's request for a postponement; or
- Any regulatory or other authority orders otherwise at the request of Qwest or the CLEC.

The arbitrator's decision regarding postponement of implementation is not binding precedent and shall have no precedential or persuasive value. The parties shall not cite or present the content of any arbitrator's decision as having precedential or persuasive value.

5.5.4.7 Arbitration Costs

Each party shall bear the costs it incurs in preparing and presenting its own case. The party against whom the issue is decided shall pay the costs for the arbitrator.

5.6 Comparability of Change Request Treatment

When a CLEC or Qwest submits a Product/Process CR in CMP, Sections 5.3 and 5.4, respectively, are applicable. While the processes contained in these sections are not identical, Qwest and the CLECs intend that the events and timeframes associated with Qwest and CLEC Product/Process CRs will be the same in all material respects for CRs that are comparable. Comparability of CRs is determined based on relative complexity, time for implementation and other relevant factors. The parties agree to periodically assess the time required to complete comparable CRs. To facilitate this assessment, Qwest will document the amount of time it takes to evaluate a Qwest originated Product/Process CR prior to CR submission to compare to the documented time it takes to evaluate a CLEC Product/Process CR. Evaluation time for Qwest Product/Process CRs shall include only activities similar to those Qwest performs for a CLEC originated Product/Process CR after CR submission until Qwest issues its final response.

5.7 Crossover Change Requests

During the operation of this CMP, there may be situations when systems CRs have requirements for product/process discussions or solutions, or when product/process CRs require System solutions. These crossover CR situations exist in three basic categories:

Category A. If a CR submitted to the product/process CMP is discovered to require a mechanized solution the following will occur:

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- Qwest will open a new systems CR, on behalf of the original CR originator, with a reference to the product/process CR number
- Qwest will close the product/process CR with a reference to the new systems CR number
- The new systems CR will comply with the CMP OSS Interface CR process(See Section 5.1)

Category B. If a CR submitted to the Systems CMP is discovered to require a manual solution the following will occur:

- Qwest will open a product/process CR, on behalf of the original CR originator, with a reference to the systems CR number;
- Qwest will close the systems CR with a reference to the new product/process CR number.
- This CR will comply with the CMP product/process CR process.

Category C. If a CR submitted to the Systems CMP is discovered to require an interim manual solution, the CR will be tracked as a systems CR for the length of the CR lifecycle including the development and implementation of both the interim manual and final mechanized solutions. In these situations, Qwest will open a second systems CR with the same number as the original CR and a "MN" suffix.

The determination to close and open CRs as described above will be made by the CMP body at a Monthly CMP Product/Process Meeting.

If a CR becomes a crossover CR, Qwest may request an ad hoc clarification meeting with the CR originator or request that a portion of the appropriate Monthly CMP Meeting be devoted to discussing the CR. If a CR is closed in one CMP arena and opened in the other, the new CR will retain the status, where feasible, and the date submitted of the old, "closed" CR. Under no circumstances will the CR be restarted.

All crossover CRs will be distinctly labeled in the Monthly CMP Meeting distribution packages and addressed as a separate item on the Monthly CMP Meeting agenda. All crossover CRs (including those closed in Categories A and B) will include the "X" designation identified in Section 5.9. All Regulatory and Industry Guideline CRs will be submitted as systems CRs and maintained in the Systems database until closure, or until they are deemed to require a manual process solution, at which point they will become product/process CRs.

5.8 Change Request Status Codes

The following status codes will be applied to Change Requests of all types (i.e., Regulatory, Industry Guideline, Qwest Originated, CLEC Originated). The status of the CR will be included in the interactive reports. CR status codes will not necessarily be assigned in the order set forth below, and not every status code will apply to every CR.

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- Submitted - A CR is updated to Submitted status when Qwest's CMP Manager has formally acknowledged the CR. The CR remains in Submitted status until Qwest has conducted a clarification meeting with the originator.
- Clarification – A CR is updated to Clarification status once the clarification meeting has been held with the originator.
- Evaluation – A CR is updated to Evaluation status if the CR requires further investigation by Qwest.
- Presented – A CR is updated to Presented status after the originator has presented it at the Monthly CMP Meeting.
- Pending Prioritization – The Pending Prioritization status is only applicable to CRs for which the impacted OSS Interface requires prioritization (e.g. IMA). A CR is updated to Pending Prioritization status after it has been presented and is waiting for Prioritization.
- Prioritized - The Prioritized status is only applicable to CRs for which the impacted interface is an OSS Interface that requires prioritization (e.g., IMA). A CR is updated to Prioritized status once it has been presented for prioritization and the Prioritization Process (Section 10.2) has been completed.
- Packaged -- A CR is updated to Packaged status from Prioritized status if it is included in the packaging option chosen for the release. Design work is continued on change requests that have been packaged. CRs not updated to Packaged status (from Prioritized status) will revert to Pending Prioritization status.
- Development – A product/process CR is updated to a Development status when Qwest's response requires development of a new or revised process. A systems CR is updated to Development status when development begins for the next OSS Interface Release.
- CLEC Test – A CR is updated to the CLEC Test status upon the effective date of the change. CLECs have the ability to evaluate the effectiveness of Qwest's change and its implementation, provide feedback, and indicate whether further action is required. Through interaction between Qwest and the interested CLECs, a product/process Change as initially implemented may undergo modification. Depending on the magnitude of such modifications, it may be appropriate to return the CR to Development status. Problems found with newly deployed Systems changes will be handled in accordance with Production Support process as described in Section 12.0. Certain processes in Section 12.0 are also applicable to product/process changes. If no further action is required for a consecutive 60 day period, the status is updated to Completed, unless the parties agree otherwise.
- Completed – A CR is updated to Completed status when the CLECs and Qwest agree that no further action is required to fulfill the requirements of the CR.
- Denied – A CR is updated to Denied status when Qwest denies the CR.
- Deferred - A CR is updated to Deferred status if the originator does not intend to escalate or dispute the CR at the present time, but wants the ability to activate or close the CR at a later date.
- Pending Withdrawal – A CR is updated to a status of Pending Withdrawal when the originator requests that a CR be withdrawn from the CMP process. Change Requests with a status of Pending Withdrawal are reviewed at the appropriate Monthly CMP Meeting to determine if another party wishes to sponsor the CR.

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- Withdrawn - The CR receives a Withdrawn status when the CR originator requests that the CR be withdrawn from the CMP and the CR is not sponsored by another party.

5.9 Change Request Designations

In certain circumstances CR numbers will require special suffix designations to identify certain characteristics. Suffixes include:

- "CM" - Changes to the CMP framework
- "DR" - Dispute Resolution Process invoked on a CR
- "ES" - Escalation Process invoked on a CR
- "EX" - Change being implemented utilizing the Exception process
- "IG" - Industry Guideline CR
- "MN" – CR for a manual workaround related to an OSS Interface Change Request
- "RG" - Regulatory CR
- "SC" - Change being implemented as an SCRP request
- "X" - Crossover CR

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Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

6.0 OSS INTERFACE RELEASE CALENDAR

Qwest will provide a rolling 12 month OSS Interface Release calendar in the distribution package of the first scheduled Monthly CMP Systems Meeting of each quarter. The calendar will show Release schedules, for all OSS Interfaces within the scope of CMP starting in that quarter and for a total of 12 months in the future. The following schedule entries will be made available, when applicable:

- Name of OSS Interface
- Date for CMP CR Submission Cutoff (for prioritized OSS Interfaces)
- Date for issuing Draft Release Notes
- Date when Initial Notification for new OSS Interfaces will be issued
- Date when Initial Notification for OSS Interface retirements will be issued
- Date when comparable functionality for OSS Interface retirements will be available
- Date for issuing Initial or Draft Technical Specifications
- Comment cycle timeline
- Prioritization, packaging and commitment timeline (for prioritized OSS Interfaces)
- Date for issuing Final Technical Specifications
- Testing period
- Date for issuing Final Release Notes
- Planned Release Production Date
- Release sunset dates (as applicable)

The OSS Interface Release calendar will be posted on the CMP Web site as a stand-alone document.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

7.0 INTRODUCTION OF A NEW OSS INTERFACE

The process for introducing a new OSS Interface will be part of this CMP. Introduction of a new OSS Interface may include an application-to-application or a Graphical User Interface (GUI).

It is recognized that the planning cycle for a new OSS Interface, of any type, may be greater than the time originally allotted. In that case, discussions between CLECs and Qwest will be held prior to the announcement of the new OSS Interface.

With a new OSS Interface, CLECs and Qwest may define the scope of functionality introduced as part of the OSS Interface.

7.1 Introduction of a New Application-to-Application Interface

At least two hundred and seventy (270) calendar days in advance of the planned Release Production date of a new application-to-application interface, Qwest will issue a Release Notification, post the Preliminary Interface Implementation Plan on Qwest's Web site, and host a design and development meeting.

7.1.1 Initial Release Notification

The Initial Release Notification will include:

- Where practicable, the Release Announcement and Preliminary Interface Implementation Plan will include: Proposed functionality of the OSS Interface including whether the OSS Interface will replace an existing OSS Interface
- Proposed implementation timeline (e.g., milestone dates, CLEC/Qwest comment cycle)
- Proposed meeting date to review the Preliminary Interface Implementation Plan
- Exceptions to industry guidelines/standards, if applicable
- Planned Release Production Date

7.1.2 CLEC Comments to Initial Release Notification

CLECs have fourteen (14) calendar days from the Initial Release Notification to provide written comments/questions on the documentation. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

7.1.3 Qwest Response to CLEC Comments

Qwest will respond with written answers to all CLEC issues within twenty-one (21) calendar days after the Initial Release Notification.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

7.1.4 Preliminary Implementation Plan Review Meeting

Qwest will review CLEC comments and the implementation schedule at the Preliminary Implementation Plan Review Meeting no later than two hundred and forty-two (242) calendar days prior to the Release Production Date.

7.1.5 Draft Interface Technical Specifications

Qwest will issue a notification associated with draft interface Technical Specifications no later than one hundred twenty (120) calendar days prior to implementing the Release. In addition, Qwest will confirm the schedule for the walk through of Technical Specifications, CLEC comments, and Qwest response cycle.

The Draft Interface Technical Specification notification will include:

- Purpose
- Logistical information (including a conference line) for walk through
- Reference to draft Technical Specifications, or Web site
- Additional pertinent material
- CLEC Comment/Qwest Response cycle
- Draft connectivity and firewall rules
- Draft Test Plan

7.1.6 Walk Through of Draft Interface Technical Specifications

Qwest will sponsor a walk through, including the appropriate internal Subject Matter Experts (SMEs), between one-hundred and ten (110) calendar days prior to Release Production and one hundred and six (106) calendar days prior to the Release Production Date. A walk through will afford CLEC SMEs the opportunity to ask questions and discuss specific requirements with Qwest's technical team and will take as much of this period as is necessary to address CLECs' questions. CLECs are encouraged to invite their technical experts, systems architects, and designers, to attend the walk through.

Qwest will lead the review of Draft Interface Technical Specifications. Qwest technical experts will answer the CLEC SMEs' questions. Qwest will capture action items such as requests for further clarification. Qwest will follow-up on all action items.

7.1.7 CLEC Comments on Draft Interface Technical Specifications

If the CLEC identifies issues or requires clarification, the CLEC must send written comments/concerns to Qwest no later than one-hundred and four (104) calendar days prior to the Release Production Date. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

7.1.8 Qwest Response to CLEC Comments

Qwest will review and respond with written answers to all CLEC issues, comments/concerns and action items captured at the walk through, no later than one hundred (100) calendar days prior to the Release Production Date. The answers will be shared with all CLECs, unless the CLECs question(s) are marked proprietary. Any changes that may occur as a result of the responses will be distributed to all CLECs in the Final Interface Technical Specifications notification. The Final Interface Technical Specifications notification will include the description of any change(s) made as a result of CLEC comments. The change(s) will be reflected in the final Technical Specifications.

7.1.9 Final Interface Technical Specifications

Generally, no later than one hundred (100) calendar days prior to the Release Production Date of the new OSS Interface, Qwest will issue the Final Technical Specifications to CLECs via Web site posting and a CLEC notification.

The Final Interface Technical Specifications notification will include:

- Summary of changes from Qwest response to CLEC comments on Draft Technical Specifications
- If applicable, Indication of type of change (e.g., documentation change, business rule change, clarification change)
- Purpose
- Reference to Final Technical Specifications, or Web site
- Additional pertinent material
- Final Connectivity and Firewall Rules
- Final Test Plan (including Joint Testing Period)
- Final Release Production Date
- Qwest response to CLEC comments

The implementation timeline for the Release will not begin until Final Interface Technical Specifications are provided. Production Support type changes within the thirty (30) calendar day test window can occur without advance notification but will be posted within twenty four (24) hours of the change.

7.2 Introduction of a New GUI

7.2.1 Initial Release Notification

Qwest will issue an Initial Release Notification no later than forty-five (45) calendar days in advance of the Release Production Date. This will include:

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

- Proposed functionality of the OSS Interface including whether the new OSS Interface will replace an existing OSS Interface.
- Implementation timeline (e.g., milestone dates, CLEC/Qwest comment cycle, GUI overview meeting date)
- Release Production Date
- Logistics for GUI Overview Meeting

7.2.2 Draft Release Notes

Qwest will issue a Draft Release Notes notification no later than twenty-eight (28) calendar days in advance of the planned Release Production Date of a new GUI. At a minimum, the notification will include:

- Draft User Guide
- How and When Training will be administered

7.2.3 GUI Overview Meeting

The GUI Overview meeting will be held no later than twenty-seven (27) calendar days prior to the Release Production Date. At the meeting, Qwest will present an overview of the new OSS Interface.

7.2.4 CLEC Comments

At least twenty-five (25) calendar days prior to the Release Production Date. CLECs must forward their written comments and concerns to Qwest. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

7.2.5 Qwest Response to CLEC Comments

Qwest will consider CLEC comments and respond with written answers as part of the Final Notification.

7.2.6 Final Release Notes

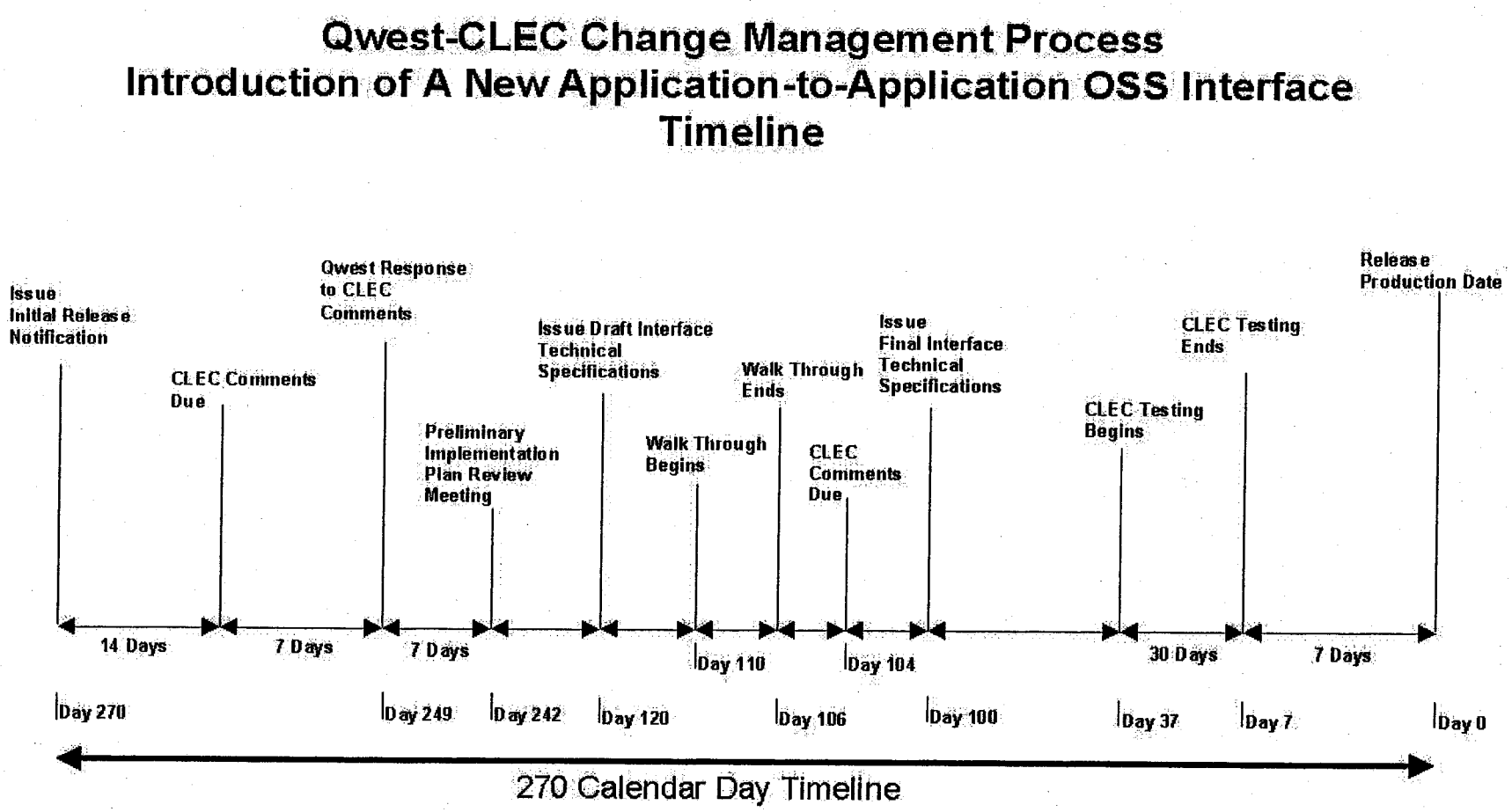
Qwest will issue Final Release Notes notification no later than twenty-one (21) calendar days prior to the Release Production date. The notification will include:

- A summary of changes from the Draft Release Notes notification, including type of changes (e.g., documentation change, clarification, business rule change).
- Final User Guide
- Final Training information
- Final Release Production Date.
- Qwest response to CLEC comments

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

Figure 2: Introduction of a New Application-to-Application OSS Interface Timeline

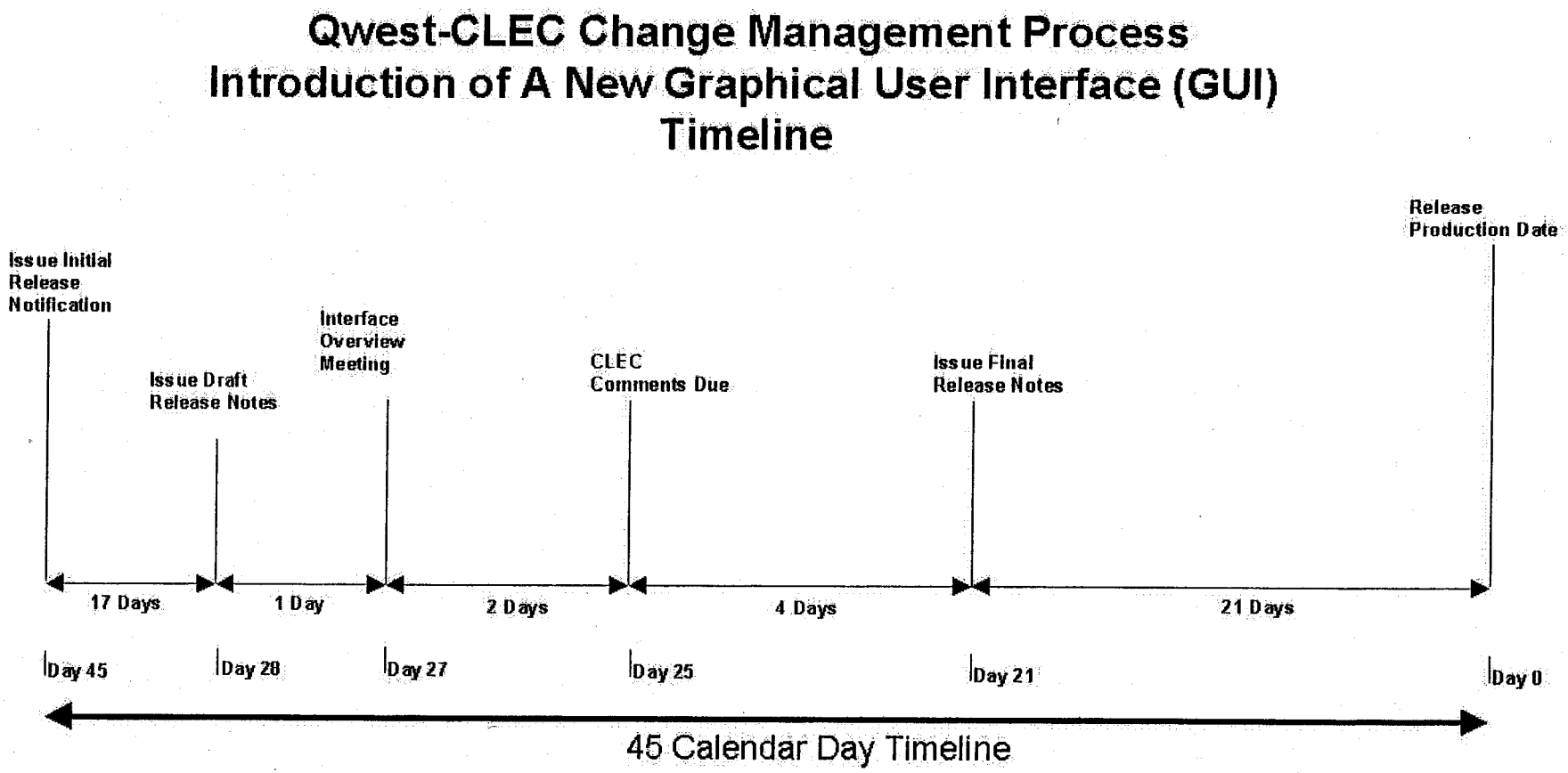


The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

Figure 3: Introduction of a New Graphical User Interface (GUI) Timeline



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

8.0 CHANGE TO AN EXISTING OSS INTERFACE

The process for changing an existing OSS Interface will be part of this CMP. Changes to an existing OSS Interface may include an application-to-application or a Graphical User Interface (GUI).

It is recognized that the planning cycle for a change to an OSS Interface, of any type, may be greater than the time originally allotted and that discussions between CLECs and Qwest may be held prior to the announcement of the change to the OSS Interface.

With a change to an OSS Interface, CLECs and Qwest may define the scope of functionality introduced as part of the OSS Interface.

Qwest standard operating practice is to implement three Major Releases and three Point Releases (for IMA only) within a calendar year. Unless mandated as a Regulatory Change, Qwest will implement no more than four (4) Releases per IMA OSS Interface requiring coding changes to the CLEC interfaces within a calendar year. Unless mandated as a Regulatory Change, the Major Release changes will occur no less than seventy-five (75) calendar days apart.

At a Monthly CMP Systems Meeting in the fourth quarter of each year, Qwest will communicate to the CLECs the Major Release schedule and hourly capacity of each release for the next calendar year. Qwest will subsequently issue a notification containing the same information. Qwest will attempt to provide this information prior to any prioritization scheduled during the fourth quarter.

Application-to-Application OSS Interface

Qwest will support the previous Major Release of Interconnect Mediated Access (IMA) EDI for one hundred eighty (180) calendar days after the subsequent Major Release of IMA EDI has been implemented. In the event that IMA EDI major releases are implemented more than six (6) months apart, any CLEC desiring to delay retirement of the previous release should submit a CR requesting the delay. Qwest will review and grant the retirement delay up until sixty (60) days after the Release Production Date of the next Major Release; however, Qwest will maintain no more than three (3) Major Releases of IMA EDI in production at any time. Qwest may retire the extended release before the extension expires when all CLECs have migrated off the extended release, but no earlier than five (5) business days after the last scheduled CLEC migration from the extended release. CLECs who do not successfully migrate from the retiring release, must contact their Qwest EDI Implementation Team immediately to schedule a new migration. Any such new migration shall not be rescheduled beyond the sixty (60) day retirement delay. (A timeline illustrating the operation of this provision is provided at the end of Section 8.) Past Releases of IMA EDI will only be modified as a result of production support

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

changes. When such production support changes are made, Qwest will also modify the related documentation. All other changes become candidates for future IMA EDI Releases.

Qwest makes one Release of the Electronic Bonding-Trouble Administration (EBTA) and billing interfaces available at any given time, and will not support any previous Releases.

Graphical User Interface (GUI)

Qwest makes one Release of a GUI available at any given time and will not support any previous Releases.

IMA GUI changes for a pre-order or ordering will be implemented at the same time as an IMA EDI Release.

8.1 Application-to-Application Interface

This section describes the timelines that Qwest, and any CLEC choosing to implement on the Qwest Release Production Date, will adhere to in changing existing application-to-application interfaces.[1] For any CLEC not choosing to implement on the Qwest Release Production Date, Qwest and the CLEC will negotiate a mutually agreed to CLEC implementation timeline, including testing.

8.1.1 Draft Interface Technical Specifications

Prior to Qwest implementing a change to an existing application-to-application interface, Qwest will notify CLECs of the draft Technical Specifications. Qwest will issue draft Technical Specifications no later than seventy-three (73) calendar days prior to the implementation date unless an exception has been granted. Technical Specifications are documents that provide information the CLECs need to code the application-to-application interface. The Draft Technical Specifications notification letter will include:

- Written summary of change(s)
- Planned time frame for Release Production
- Purpose
- Logistical information (including a conference line) for walk through
- Reference to draft Technical Specifications, or reference to a Web site with draft specifications
- Additional pertinent material
- Draft Technical Specifications documentation, or instructions on how to access the draft Technical Specifications documentation on the Web site.

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[1] For a CLEC converting from a prior release, the CLEC implementation date can be no earlier than the weekend after the Qwest Release Production Date, if production LSR conversion is required.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

8.1.2 Walk Through of Draft Interface Technical Specifications

Qwest will sponsor a walk through, including the appropriate internal Subject Matter Experts (SMEs), between sixty-eight (68) calendar days prior to the planned implementation date and fifty-eight (58) calendar days prior to the planned implementation date. A walk through will afford CLEC SMEs the opportunity to ask questions and discuss specific requirements with Qwest's technical team and will take as much of this period as is necessary to address CLECs' questions. CLECs are encouraged to invite their technical experts, systems architects, and designers, to attend the walk through.

Qwest will lead the review of the Draft Technical Specifications. Qwest technical experts will answer the CLEC SMEs' questions. Qwest will capture action items such as requests for further clarification. Qwest will follow-up on all action items and notify CLECs of responses forty five (45) calendar days prior to the planned implementation date.

8.1.3 CLEC Comments on Draft Interface Technical Specifications

If the CLEC identifies issues or requires clarification, the CLEC must send written comments to Qwest no later than fifty-five (55) calendar days prior to the planned implementation date. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

8.1.4 Qwest Response to CLEC Comments

Qwest will review and respond with written answers to all CLEC issues, comments/concerns no later than forty-five (45) calendar days prior to final implementation date. The answers will be shared with all CLECs, unless the CLECs question(s) are marked proprietary. Any changes that may occur as a result of the responses will be distributed to all CLECs in the same notification letter. The notification will include the description of any change(s) made as a result of CLEC comments. The change(s) will be reflected in the Final Technical Specifications.

8.1.5 Final Interface Technical Specifications

The Final Interface Technical Specifications will include the following:

- Reference to Final Technical Specifications, or Web site
- Qwest response to CLEC comments
- Summary of changes from the prior implementation, including any changes made as a result of CLEC comments on Draft Technical Specifications
- Indication of type of change (e.g., documentation change, business rule change, clarification change)
- Final Joint Test Plan including transactions which have changed
- The suite of re-certification test scenarios

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

- Joint Testing Period
- Final implementation date

Qwest will issue Final Interface Technical Specifications no later than forty-five (45) calendar days before the final implementation date, unless the exception process has been invoked. The implementation timeline for the Release will not begin until Final Technical Specifications are provided. Production Support type of changes that occur within the thirty (30) calendar day test window can occur without advance notification but will be posted within 24 hours of the change.

8.1.6 Joint Testing Period

Qwest will provide a thirty (30) day test window for any CLEC who desires to jointly test with Qwest prior to the Release Production Date.

8.1.7 Release Documentation Addenda

After the Final Technical Specifications are published, there may be other changes made to documentation or the coding that is documented in the form of addenda.

- 1st Addendum – 2 weeks after the Release the 1st addendum is sent to the CLECs, if needed.
- Subsequent Addendum's – Subsequent addendum's are sent to the CLECs after the Release Production Date as needed. There is no current process and timeline.
- EDI CLECs –one hundred eighty (180) calendar days after the Release those CLECs using EDI are required to cut over to the new Release. CLECs are not required to support all new Releases.

8.2 Graphical User Interface (GUI)

8.2.1 Draft GUI Release Notes

Prior to implementation of a change to an existing GUI, Qwest will notify CLECs of the Draft GUI Release Notes and the planned Release Production Date.

Notification will occur no later than twenty-eight (28) calendar days prior to the planned Release Production Date unless an exception has been granted. This notification will include draft user guide information if necessary.

The notification will contain:

- Written summary of change(s)
- Planned time frame for Release Production
- Any cross-reference to draft documentation such as the user guide or revised user guide pages.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

8.2.2 CLEC Comments on Draft Interface Release Notification

CLECs must provide comments/questions on the Draft GUI Release Notes no less than twenty-five (25) calendar days prior to the planned Release Production Date. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html or via an e-mail to cmpcomm@qwest.com.

8.2.3 Qwest Response to Comments

Qwest will consider CLEC comments and will address them in the Final GUI Release Notification no later than twenty one (21) calendar days before the Release Production Date.

8.2.4 Content of Final Interface Release Notification

The Final Interface Release Notification, will include:

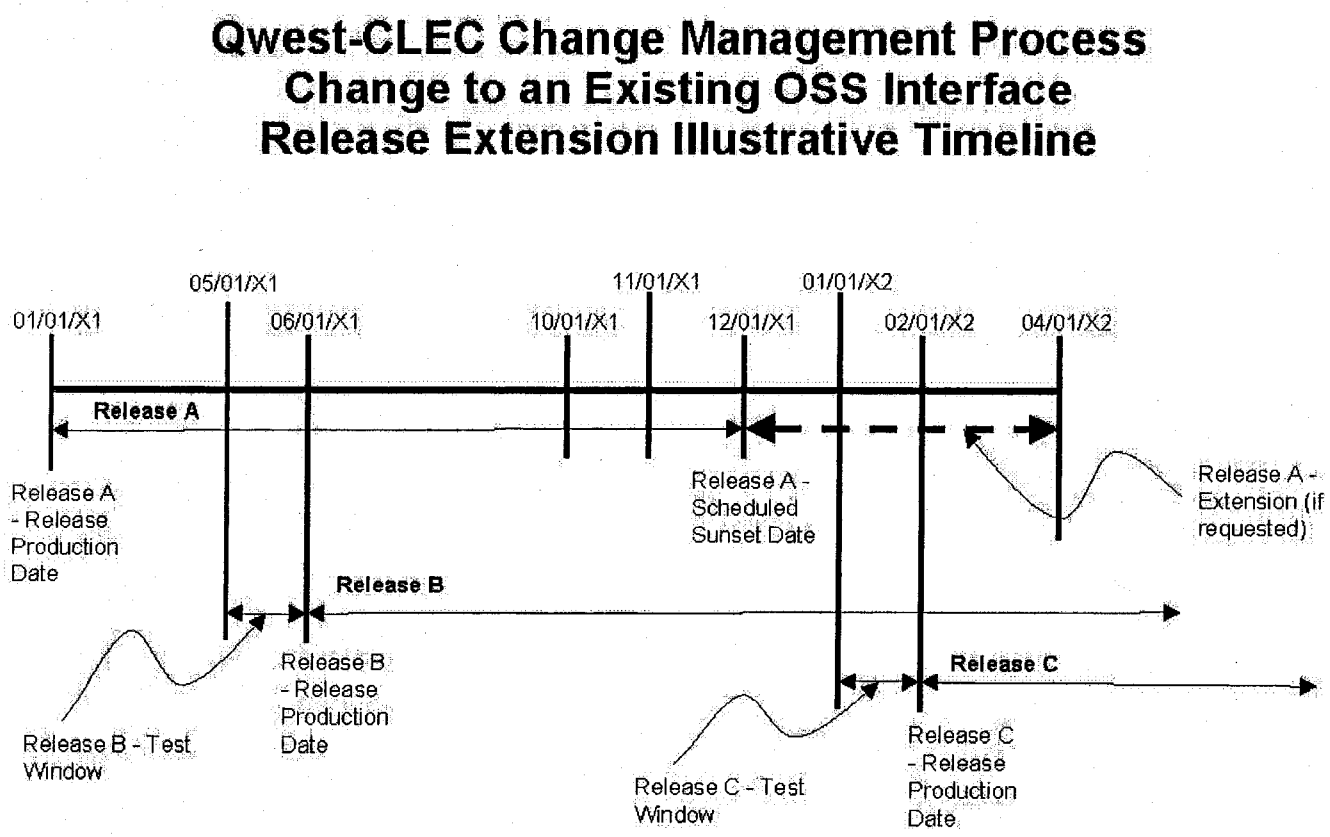
- Final notification letter
- Summary of changes from draft GUI Release notification
- Final user guide (or revised pages)
- Final Release Production Date
- Qwest Response to CLEC comments

Qwest will issue the Final Interface Release Notification no later than twenty-one (21) calendar days before the final Release Production Date. Qwest will post this information on the CMP Web site. Production support type changes that occur without advance notification will be posted within 24 hours of the change. The implementation timeline for the Release will not begin until all related documentation is provided.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

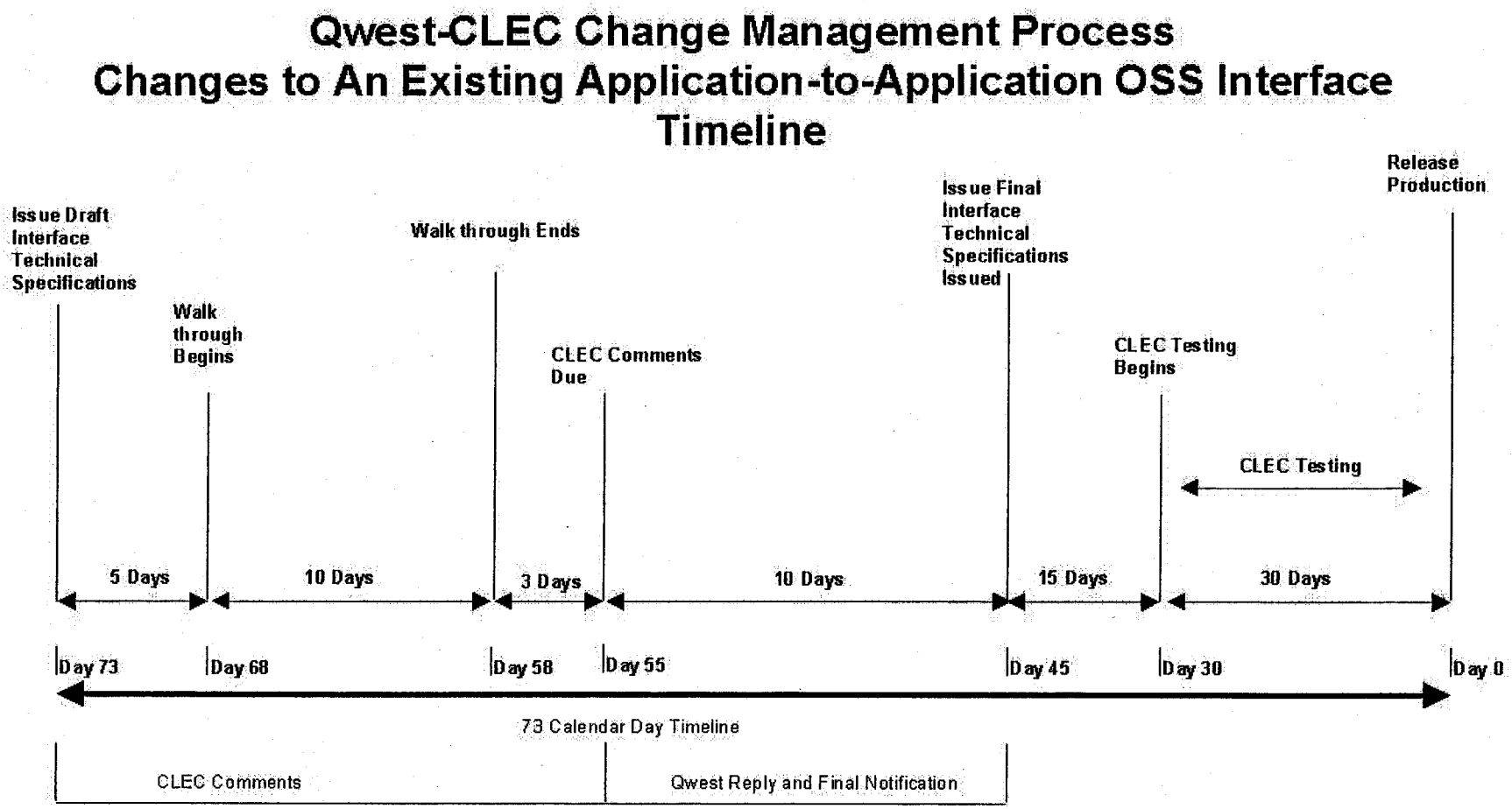
Figure 4: Release Extension Illustrative Timeline



Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

Figure 5: Changes to an Existing Application-to-Application OSS Interface Timeline



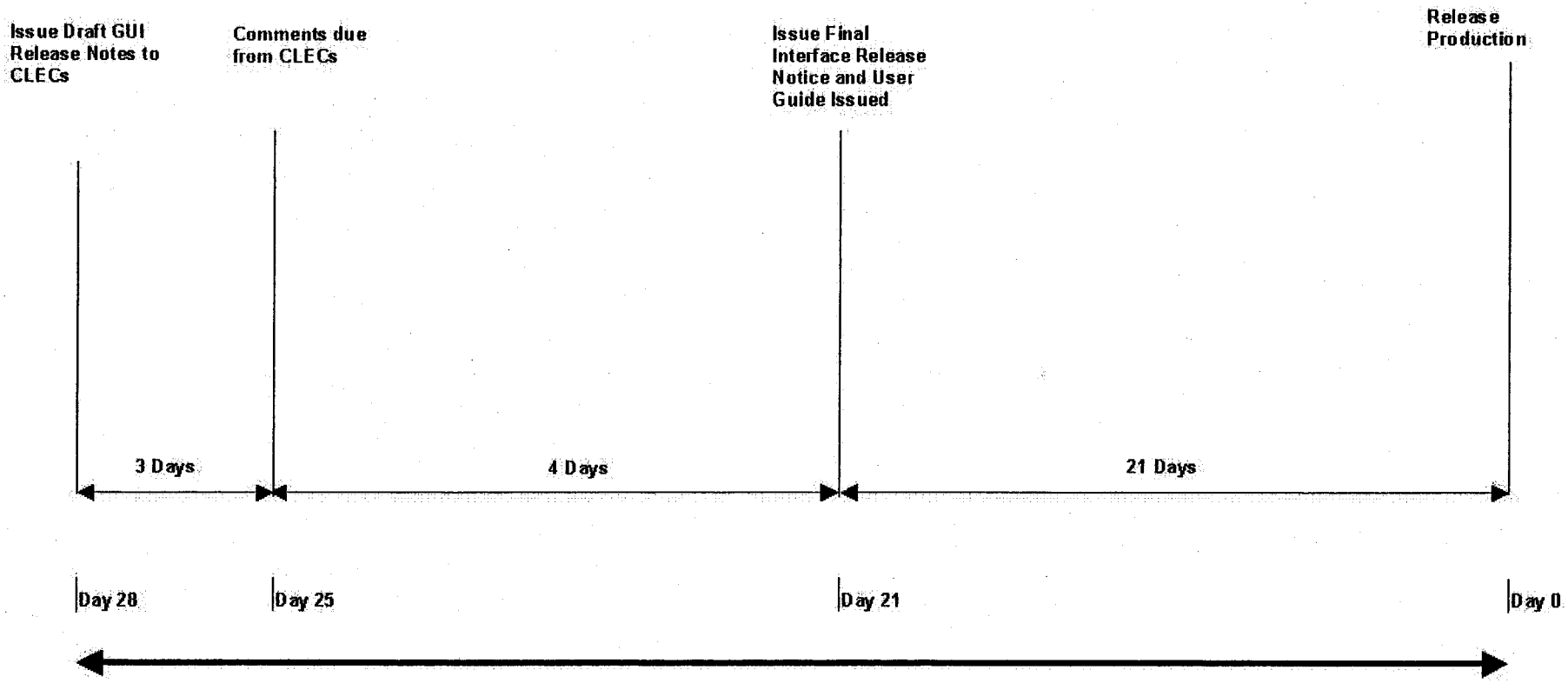
The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

Figure 6: Changes to An Existing Graphical User Interface (GUI) Timeline

Qwest-CLEC Change Management Process
Changes to An Existing Graphic User Interface (GUI) Timeline



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

9.0 RETIREMENT OF AN EXISTING OSS INTERFACE

The retirement of an existing OSS Interface occurs when Qwest ceases to accept transactions using a specific OSS Interface. This may include the removal of a GUI or a protocol transmission of information (Application-to-Application) interface.

9.1 Application-to-Application OSS Interface

9.1.1 Initial Retirement Notification

At least two hundred seventy (270) calendar days before the retirement date of application-to-application interfaces, Qwest will share the retirement plans via Web site posting and CLEC notification. The scheduled new application-to-application interface is to be in a CLEC certified production Release prior to the retirement date of the older interface.

Alternatively, Qwest may choose to retire an interface if there is no CLEC usage of that interface for the most recent ninety (90) consecutive calendar days. Qwest will provide thirty (30) calendar day notification of the retirement via Web posting and CLEC notification.

Qwest will issue the initial Retirement Notification no later than two hundred seventy (270) calendar days before retirement. The Initial Retirement Notification will include:

- The rationale for retiring the OSS Interface
- Available alternative interface options for existing functionality
- The proposed detailed retirement timeline (e.g., milestone dates, CLEC-Qwest comment and response cycle)
- Planned retirement date

9.1.2 CLEC Comments to Initial Retirement Notification

CLEC comments on the Initial Retirement Notification are due to Qwest no later than fifteen (15) calendar days following the Initial Retirement Notification. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

9.1.3 Qwest Response to Comments

Qwest will consider CLEC comments and respond in the Final Retirement Notification.

9.1.4 Final Retirement Notification

The Final Retirement Notification will be provided to CLECs no later than two-hundred and twenty-eight (228) calendar days prior to the retirement date of the application-to-application interface. The Final Retirement Notification will contain:

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

- The rationale for retiring the OSS Interface (e.g., no usage or replacement)
- If applicable, where the replacement functionality will reside in a new interface and when the new interface has been certified by a CLEC
- Qwest's responses to CLECs' comments/concerns
- Actual retirement date

9.1.5 Comparable Functionality

Unless otherwise agreed to by Qwest and a CLEC user, when Qwest issues the Initial Retirement Notification the retirement of an interface for which a comparable interface does or will exist, a CLEC user will not be permitted to commence building to the retiring interface. CLEC users of the retiring interface will be grandfathered until the retirement of the interface. Qwest will ensure that an interface with comparable functionality is available no later than one hundred and eighty (180) calendar days prior to retirement of an Application-to-Application interface.

9.2 Graphical User Interface (GUI)

9.2.1 Initial Retirement Notification

At least sixty (60) calendar days in advance of the retirement date of a GUI, Qwest will share the retirement plans via Web site posting and CLEC notification. The scheduled new interface is to be in a CLEC certified production Release prior to the retirement of the older interface.

Alternatively, Qwest may choose to retire a GUI if there is no CLEC usage of that interface for the most recent ninety (90) consecutive calendar days. Qwest will provide thirty (30) calendar day notification of the retirement via Web posting and CLEC notification.

Initial Retirement Notification will include:

- The rationale for retiring the OSS Interface
- Available alternative interface options for existing functionality
- The proposed detailed retirement timeline (e.g., milestone dates, CLEC-Qwest comment and response cycle)
- Planned retirement date

9.2.2 CLEC Comments to Initial Retirement Notification

CLEC comments to the Initial Retirement Notification are due to Qwest no later than fifteen (15) calendar days following the Initial Retirement Notification. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

9.2.3 Qwest Response to Comments

Qwest will consider CLEC comments and respond in the Final Release Notification.

9.2.4 Comparable Functionality

Qwest will ensure comparable functionality no later than thirty-one (31) days before retirement of a GUI.

9.2.5 Final Retirement Notification

The Final Retirement Notification, for GUI retirements, will be provided to CLECs no later than twenty-one (21) calendar days before the retirement date. The Final Retirement Notification will contain:

- The rationale for retiring the OSS Interface (e.g., no usage or replacement)
- If applicable, where the replacement functionality will reside in a new interface and when the new interface has been certified by a CLEC
- Qwest's responses to CLECs' comments/concerns
- Actual retirement date

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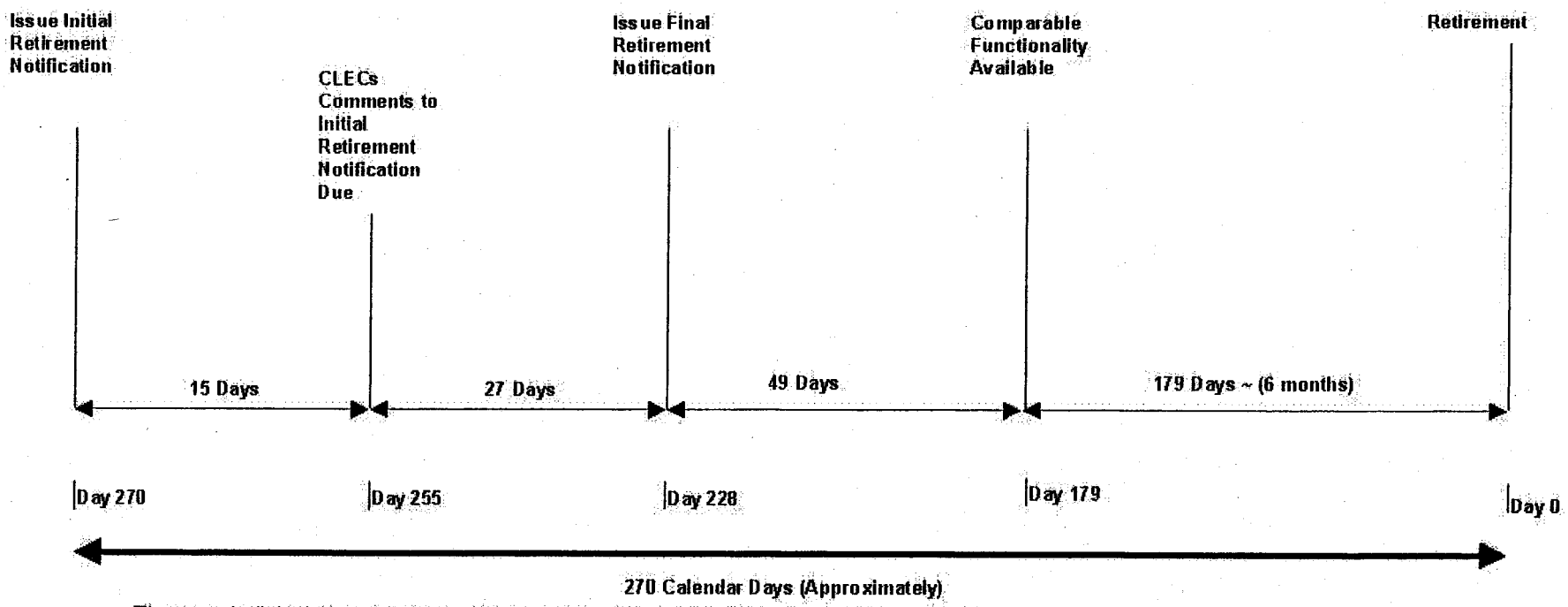
Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

Figure 7: Retirement of an Existing Application-to-Application OSS Interface Timline

Qwest-CLEC Change Management Process
Retirement of An Existing Application-to-Application OSS Interface Timeline



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

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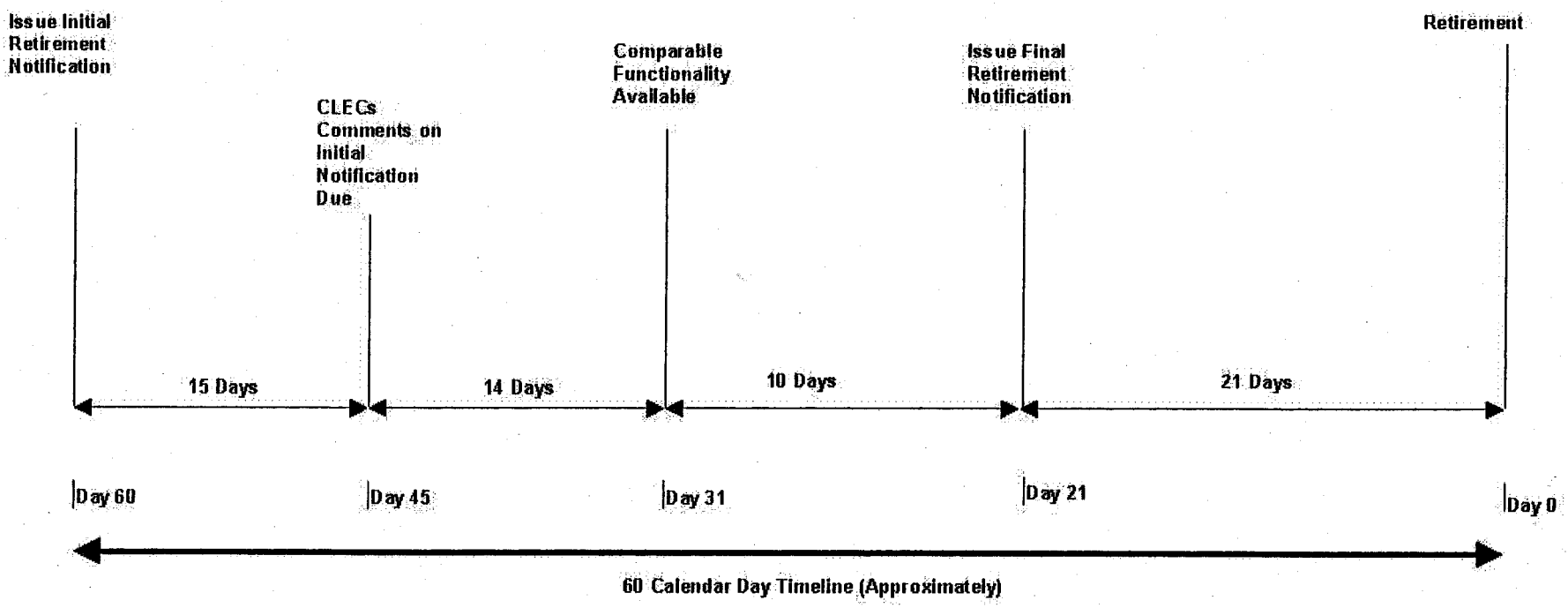
Figure 8: Retirement of an Existing Graphic User Interface Timeline

Qwest-CLEC Change Management Process
Retirement of An Existing Graphic User Interface Timeline



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

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10.0 PRIORITIZATION

Each OSS Interface Release is prioritized separately. If the Systems CMP Change Requests for any interface do not exceed Release capacity, no prioritization for that Release is required. The prioritization process provides an opportunity for CLECs and Qwest to prioritize OSS Interface Change Requests (CRs). CRs for introduction of a new interface or retirement of an existing interface are not subject to prioritization and will follow the introduction or retirement processes outlined in Sections 7.0 and 9.0, respectively.

10.1 Test Environment Releases

When an OSS Interface release is prioritized, some of the prioritized OSS Interface CRs will cause a change in that OSS Interface's corresponding test environment. These changes will be included in the test environment release that is made available thirty (30) days prior to the OSS Interface implementation date, and will not be subject to prioritization. The business and systems requirements for these test environment changes will be developed in the same order as the prioritized OSS Interface CRs. Qwest will ensure that the resources allocated to the test environment are sufficient to complete the corresponding OSS Interface Release changes described above.

Any remaining test environment capacity will be allocated to CRs that are specific to the test environment. CRs that are specific to the test environment will be prioritized in accordance with Section 10.0.

Qwest's OSS Interface production environment and test environment development efforts will not compete for resources.

10.2 Regulatory Change Requests

Regulatory changes, are defined in Section 4.0. Separate procedures are required for prioritization of CRs requesting Regulatory changes to ensure that Qwest can comply with the recommended or required implementation date, if any. The process for determining whether a CR is a Regulatory Change is set forth in Section 5.1.

Qwest will send CLECs a notification when it posts Regulatory CRs to the Web and identify when comments are due, as described in Section 5.1. Regulatory CRs will also be identified in the Monthly CMP Systems Meeting distribution package.

10.2.1 Regulatory Changes

For Regulatory Changes, Qwest will implement changes no later than the time specified in the legislation, regulatory requirement, or court ruling. If no time is specified, Qwest will implement the change as soon as practicable.

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Regulatory CRs will be ranked with all other CRs. If the implementation date for a Regulatory CR requires all or a part of the change to be included in the upcoming Major Release, the CR will not be subject to ranking and will be automatically included in that Major Release.

10.2.2 Industry Guideline Changes

Industry Guideline CRs will be identified in the Monthly CMP Systems Meeting distribution package. Industry Guideline CRs will be ranked with all other systems CRs during prioritization as described in Section 10.0. If an Industry Guideline CR is prioritized high enough to be included in the business and systems requirements phase and is dependant on a "foundation" CR, the "foundation" CR will automatically be worked in conjunction with the Industry Guideline CR.

10.2.3 Regulatory Change Implementation

When more than one Major Release is scheduled before the mandated or recommended implementation date for a Regulatory CR, Qwest will present information to CLECs regarding any technical, practical, or development cycle considerations that may affect Qwest's ability to implement the CR in any particular Major Release as part of the CR review and continue to provide information up to the packaging options. At the Monthly CMP Systems Meeting where the Regulatory CR is presented, Qwest will advise CLECs of the possible scheduled Releases in which Qwest could implement the CR and the CLECs and Qwest will determine how to allocate those CRs among the available Major Releases, taking into account the information provided by Qwest regarding technical, practical, and/or development considerations. If the Regulatory CR is not included in a prior Release, it will be implemented in the latest Release specified by Qwest.

10.3 Prioritization Process

10.3.1 Prioritization Review

At the last Monthly CMP Systems Meeting before Prioritization, Qwest will facilitate a Prioritization Review including a discussion of all CRs eligible for prioritization in a Major Release. If there are any Industry Guideline CRs eligible for prioritization, Qwest will identify all Industry Guideline CRs that would need to be implemented prior to or in conjunction with such CRs. Qwest will distribute all materials five (5) calendar days prior to the Prioritization Review. The materials will include:

- Agenda
- Summary document of all CRs eligible for prioritization including identification of dependencies (see Appendix A - Sample – IMA 11.0 Rank Eligible CRs)

Both CLECs and Qwest will have appropriate Subject Matter Experts in attendance at the Prioritization Review. The review and discussion meetings are open to all CLECs.

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The Prioritization Review objectives are to:

- Allow CLECs and Qwest to discuss eligible OSS Interface or test environment Change Requests by providing specific input as to the relative importance that CLECs, as a group, and Qwest assign to each such Change Request.

10.3.2 Ranking Process

Within three (3) business days following the Monthly CMP Systems Meeting that includes the Prioritization Review, Qwest will distribute the Prioritization Form for ranking. Ranking will be conducted according to the following guidelines:

- Each CLEC and Qwest may submit one completed Prioritization Form. The ranking must be submitted by a Point of Contact. The ranking will be submitted to the Qwest CMP Manager in accordance with the process described in Section 10.3.3 below. Refer to Appendix B: Sample – IMA 11.0 Initial Prioritization Form
- Qwest and each CLEC ranks each Change Request on the Prioritization Form by providing a point value from 1 through n, where n is the total quantity of CRs. The highest point value will be assigned to the CR that Qwest and CLECs wish to be implemented first. The total points will be calculated by the Qwest CMP Manager and the results will be distributed to the CLECs in accordance with the process described in Section 10.3.3 below. Refer to Appendix C : Sample – IMA 11.0 Prioritization List.

10.3.3 Ranking Tabulation Process

CLECs and Qwest who choose to vote must submit their completed Prioritization Form via e-mail, cmpcr@qwest.com, within three (3) business days following Qwest's distribution of the Prioritization Form. Within two (2) business days following the deadline for submission of ranking, Qwest will tabulate all rankings and e-mail the resulting Initial Prioritization List to the CLECs. The results will be announced at the next scheduled Monthly CMP Systems Meeting. Prioritization is based on the results of the votes received by the deadline. Based on the outcome of the final ranking of the CR candidates, an Initial Prioritization List is produced.

10.3.4 Ranking of Late Added CRs

For those late added CRs that are eligible for inclusion, as a candidate, in the most recently prioritized Release, the prioritization process will be as follows.

- Within three (3) business days following the Monthly CMP Systems Meeting that resulted in the decision to include the late added CR as a candidate in the recently prioritized Release, Qwest will distribute the late added CR for ranking, along with the initial prioritization.
- Each CLEC and Qwest may submit a suggested rank for the late added CR. The suggested rank will be the number corresponding to the position on the Initial Prioritization List that the CLEC or Qwest believes the late added CR should be inserted.

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- CLECs and Qwest who choose to vote must return their suggested rank for the late added CR via e-mail within three (3) business days following Qwest's distribution of the late added CR for ranking.

Within two (2) business days following the deadline for the return of the suggested rank, Qwest will tabulate the results by averaging the returned suggested ranks for the late added CR. Qwest will insert the late added CR into the Initial Prioritization List at the resulting point on the list and will renumber the remaining candidates on the list based on this insertion. Qwest will e-mail an updated Prioritization List to the CLECs. The results will be announced at the next scheduled Monthly CMP Systems Meeting.

10.3.5 Withdrawal of Prioritized CRs

A CLEC or Qwest may elect to withdraw a CR that has been prioritized for an OSS Interface Release. This process may be invoked at any time between the prioritization process and the commitment for the Release. Qwest will determine its ability to work additional CRs for the Release based upon the timing of the withdrawal request. After commitment, a CLEC or Qwest could request the CR be withdrawn, however, the withdrawal of the CR may not be feasible based upon the development status at the time of the withdrawal request. The process will be as follows:

- The originating CLEC or Qwest will submit an e-mail request to the Qwest CMP Manager, cmpcr@qwest.com, indicating that they wish to withdraw the CR. This e-mail must be sent no later than twenty one (21) calendar days prior to the Monthly CMP Systems Meeting at which the request will be discussed. The written request must contain:
  - the CR number
  - the CR title
  - an explanation of why the originator wishes to withdraw the CR
- Within two (2) business days after receipt of the request to withdraw the CR the CMP Manager will notify, in writing, all of the CLECs that submitted a prioritization ranking. The subject line will note "INTENT TO WITHDRAW PRIORITIZED CR [number]." The notification will include:
  - the CR number
  - the CR title,
  - the ranking that it received from the prioritization,
  - the explanation of why the originator wishes to withdraw the CR
- If a CLEC or Qwest disagrees with the withdrawal of the CR from the Release, they have the option to assume sponsorship of that CR. They may do so by notifying the CMP Manager, cmpcr@qwest.com, in writing of their intent to assume sponsorship of the CR within five (5) business days after the CMP Manager has sent the intent to withdraw e-mail. If the CMP Manager receives no response within five (5) business days, then the CR will be withdrawn. The new status will be reviewed in the next Monthly CMP Systems Meeting.

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10.4 Special Change Request Process (SCRP)

In the event that a systems CR is not ranked high enough in prioritization for inclusion in the next Release, or as otherwise provided in this CMP, the CR originator may elect to invoke the CMP Special Change Request Process (SCRP) as described in this section. In the event that a carrier submits a CR after prioritization and wishes to invoke the SCRP, the originator may elect not to follow the Late Added CR process as defined in Section 10.3.4.

The SCRP does not supercede the process defined in Section 5.0 (Change Request Origination Process).

The foregoing process applies to Qwest and CLEC originated CRs. In the event a CR is submitted through the SCRP, Qwest agrees that it will not divert IT resources available to work on the CMP systems CRs, to support the SCRP request. Qwest will have to apply additional resources to, and track, the additional work required for the CR it seeks to implement through the SCRP.

All time intervals within which a response is required from one Party to another under this section are maximum time intervals. Each Party agrees that it will provide all responses in writing to the other Party as soon as the Party has the information and analysis required to respond, even if the time interval stated herein for a response is not over.

10.4.1 SCRP Request Form

To invoke the SCRP, the CR originator must send an e-mail to the Qwest CMP SCRP mailbox (cmpesc@qwest.com). The subject line of the e-mail message must include:

- "SCRP FORM"
- CR number and title
- CR originator's company name

The text of the e-mail message must include:

- Description of the CR
- A completed SCRP Form (See Appendix E)
- A single point of contact for the SCRP request including:
  - Primary requestor's name and company
  - Phone number
  - E-mail address
- Circumstances which have necessitated the invocation of the SCRP
- Desired implementation date
- If more than one company is making the SCRP request, the names and point of contact information for the other requesting companies.

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10.4.2 Qwest Acknowledges SCRP Request Receipt with a Confirmation E-mail

Within two (2) business days following receipt of the SCRP request e-mail, Qwest will acknowledge receipt of the complete SCRP request e-mail with a confirmation e-mail and advise the SCRP Requestor of any missing information needed for Qwest to process and analyze the request. When the SCRP request e-mail is complete, the SCRP confirmation e-mail will include:

- Date and time of receipt of complete SCRP request e-mail
- Date and time of SCRP confirmation e-mail
- SCRP title and number
- The name, telephone number and e-mail address of the assigned Qwest manager
- Amount of the non-refundable Processing Fee as specified in Section 10.4.8.

10.4.3 Process Fee Invoice

Within one (1) business day of sending the SCRP confirmation e-mail Qwest will bill the SCRP Requestor a non-refundable Processing Fee as specified in Section 10.4.8 below.

10.4.4 SCRP Review Meeting

Within ten (10) business days after the SCRP confirmation e-mail, Qwest will schedule and hold a review meeting with the SCRP Requestor to review Qwest's analysis of the request.

10.4.5 Preliminary SCRP Quote and Review Meeting

During business and systems requirements analysis, Qwest will review the SCRP request to determine if it has any affinities with CRs packaged for the planned OSS Interface Release. As soon as feasible, but in any case within thirty (30) business days, after receipt of a completed SCRP request form, Qwest will schedule and hold a meeting with the SCRP Requestor to provide and review:

- An estimated Preliminary SCRP quote. The SCRP quote will, at a minimum, include the following information:
  - A description of the work to be performed
  - Estimated Development costs with a cap on cost
  - Targeted Release
  - An estimate of the terms and conditions surrounding the firm SCRP quote. (If the estimate increases before Qwest issues the Firm SCRP Quote, Qwest will communicate the cost increases to the SCRP Requestor.) The SCRP Requestor must comply with payment terms as outlined in Section 10.4.7 before Qwest proceeds with the request.
- An invoice covering the business and systems requirements analysis
  - Payment for this invoice is due no later than thirty (30) calendar days following Qwest's written issuance of the Preliminary SCRP Quote. Qwest will not proceed with further

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development in support of the SCRP Request until the business and systems analysis and processing invoices are paid.

10.4.5.1 SCRP Requestor Accepts the Preliminary Quote and Decision for Qwest to Proceed

The SCRP Requestor has ten (10) business days, upon receipt of the SCRP quote, to either agree to purchase under the quoted price or cancel the SCRP request.

If the SCRP Requestor accepts the SCRP Preliminary Quote, the SCRP Requestor must send an e-mail to the assigned Qwest manager with the following information:

The subject line of the e-mail message must include:

- "SCRP PRELIMINARY QUOTE ACCEPTED"
- CR number and title
- CR originator's company name

The text of the e-mail message must include:

- Statement accepting SCRP Preliminary Quote, planned OSS Interface Release date, and terms and conditions
- CR originator's name, phone number, and e-mail address

10.4.5.2 SCRP Requestor Asks to Change the SCRP Request

If the SCRP Requestor decides to modify the SCRP request after Qwest provides the preliminary SCRP Quote, the SCRP requestor must submit a written request for change to the assigned Qwest manager. If changes are acceptable to Qwest, Qwest will notify the SCRP Requestor by e-mail within five (5) business days after receipt of such request for a change with a revised preliminary SCRP Quote, if applicable. The SCRP Requestor must inform Qwest, in writing, within five (5) business days, if the modified SCRP quote is acceptable, further changes are required, or the SCRP request is cancelled.

10.4.5.3 SCRP Requestor Cancels the SCRP Request

The last point at which a SCRP Request may be cancelled is at the Monthly CMP Meeting at which Qwest presents the CRs that Qwest has committed to in the Release. Otherwise, the SCRP request will be implemented with the Release and the SCRP Requestor is obligated to pay the full amount of the firm SCRP quote consistent with the payment schedule described below in Section 10.4.7.

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10.4.6 Firm SCRP Quote and Review

Qwest will provide the SCRP Requestor a Firm SCRP Quote when Qwest commits CRs to the specific OSS Interface Release.

Qwest will send an e-mail to the SCRP Requestor with the following information:

- The subject line of the e-mail message must include:
  - "FIRM SCRP QUOTE"
  - CR number and title
  - CR originator's company name
- The text of the e-mail message must include:
  - Final SCRP quote and terms and conditions
  - Committed implementation date, or OSS Interface Release
  - Qwest contact name, phone number, and e-mail address

Qwest will schedule and hold a meeting to review the quote no less than ten (10) days following issuance of the Firm SCRP Quote. At this meeting Qwest will review the elements of the Firm Quote and the firm Release Date of the targeted Release.

10.4.7 Payment Schedule

The SCRP Requestor must pay 50% of the Firm SCRP Quote no more than ten (10) calendar days following the scheduled Release date and the remaining 50% of the Firm SCRP Quote within thirty (30) calendar days after the scheduled Release date.

10.4.8 Applicable SCRP Charges

This section describes the different costs for a SCRP request.

- Processing Fee – a one-time flat fee that must be paid within thirty (30) calendar days after the Qwest-SCRP Review meeting to review the SCRP form. This fee is non-refundable and is treated separately from those charges for development and implementation as described under "Charges for the SCRP Request" below.
- Charges for Business and Systems Requirements - These charges include the costs of developing business and systems requirements.
- Charges for the Development of the SCRP Request – These charges, included in the Preliminary and Firm SCRP Quotes, including labor charges, time and capital costs incurred as a result of developing code and performing testing.

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11.0 APPLICATION-TO-APPLICATION INTERFACE TESTING

If a CLEC is using an application-to-application interface, the CLEC must work with Qwest to certify the business scenarios that CLEC will be using in order to ensure successful transaction processing in production. If multiple CLECs are using a service bureau provider, the service bureau provider need only be certified for the first participating CLEC; subsequent CLECs using the service bureau provider need not be re-certified. Qwest and CLEC shall mutually agree to the business scenarios for which CLEC requires certification. Certification will be granted for the specified Release of the application-to-application interface. If CLEC is certifying multiple products or services, CLEC has the option of certifying those products or services serially or in parallel if technically feasible.

New Releases of the application-to-application interface may require re-certification of some or all business scenarios. A determination as to the need for re-certification will be made by the Qwest coordinator in conjunction with the Release Manager of each Release. Notification of the need for re-certification will be provided to CLEC as the new Release is implemented. The suite of re-certification test scenarios will be provided to CLECs with the Final Technical Specifications. If CLEC is certifying multiple products or services, CLEC has the option of certifying those products or services serially or in parallel, if technically feasible. If multiple CLECs are using a service bureau provider, the service bureau provider need only be re-certified for the first participating CLEC; subsequent CLECs using the service bureau provider need not be re-certified.

Qwest provides a separate Customer Test Environment (CTE) for the testing of transaction based application-to-application interfaces for pre-order, order, and maintenance/repair. The CTE will be developed for each Major Release and updated for each Point Release that has changes that were disclosed but not implemented as part of the Major Release. Qwest will provide test files for batch/file interfaces (e.g., billing).

The CTE for Pre-order and Order currently includes:

- Stand Alone Test Environment (SATE)

The CTE for Maintenance and Repair currently includes:

- CMIP Interface Test Environment (MEDIACC)

Qwest provides Initial Implementation Testing, and Migration Testing (from one Release to the next) for all types of OSS Interface Change Requests. Such testing provides the opportunity to test the code associated with those OSS Interface exchange requests. The CTE will also provide the opportunity for regression testing of OSS Interface functionality.

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11.1 Testing Process

Qwest will send an industry notification, including testing schedules (see Section 8.0 – Changes to Existing OSS Interfaces), to CLECs so they may determine their intent to participate in the test. CLECs wishing to test with Qwest must participate in at least one joint planning session and determine:

- Connectivity (required)
- Progression Testing (required)
- Controlled Production Testing (required)
- Production Turn-up (required)
- A test schedule (required) that reflects agreed upon dates for phases

A joint CLEC-Qwest test plan may also include some or all of the following based on type of testing requested:

- Requirements Review
- Test Data Development

Qwest will communicate any agreed upon changes to the test schedule. CLECs are responsible for establishing and maintaining connectivity to the CTE.

The CLEC should, in general, experience response times similar to production provided a CLEC uses the same software components and similar connectivity configuration in its test environment that it does in production. This environment is not intended for volume testing. The CTE contains the appropriate applications for pre-ordering and Local Service Request (LSR) ordering, including the service order processor. Production code problems identified in the test environment will be resolved by using the Production Support process as outlined in Section 12.0.

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12.0 PRODUCTION SUPPORT

12.1 Notification of Planned Outages

Planned Outages are reserved times for scheduled maintenance to OSS Interfaces. Qwest sends associated notifications to all CLECs. Planned Outage Notifications must include:

- Identification of the subject OSS Interface
- Description of the scheduled OSS Interface maintenance activity
- Impact to the CLECs (e.g., geographic area, products affected, system implications, and business implications)
- Scheduled date and scheduled start and stop times
- Work around, if applicable
- Qwest contact for more information on the scheduled OSS Interface maintenance activity

Planned Outage Notifications will be sent to CLECs and appropriate Qwest personnel no later than two (2) calendar days after the scheduling of the OSS Interface maintenance activity.

12.2 Newly Deployed OSS Interface Release

Following the Release Production Date of an OSS Interface change, Qwest will use production support procedures for maintenance of software as outlined below. Problems encountered by the user will be reported, if at all, to the IT Wholesale Systems Help Desk (IT Help Desk). Qwest will monitor, track, and address troubles reported by CLECs or identified by Qwest. Problems reported will be known as IT Trouble Tickets.

A week after the deployment of an IMA Release into production, Qwest will host a conference call with the CLECs to review any identified problems and answer any questions pertaining to the newly deployed software. Qwest will follow this CMP for documenting the meeting as described in Section 3.2. Issues will be addressed with specific CLECs and results/status will be reviewed at the next Monthly CMP Systems Meeting.

12.3 Request for a Production Support Change

The IT Help Desk supports CLECs who have questions regarding connectivity, outputs, and system outages. The IT Help Desk serves as the first point of contact for reporting trouble. If the IT Help Desk is unable to assist the CLEC, it will refer information to the proper Subject Matter Expert, also known as Tier 2 or Tier 3 support, who may call the CLEC directly. Often, however, an IT Help Desk representative will contact the CLEC to provide information or to confirm resolution of the trouble ticket.

Qwest will assign each CLEC generated and Qwest generated IT Trouble ticket a Severity Level 1 to 4, as defined in Section 12.5. Severity 1 and Severity 2 IT trouble tickets will be

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implemented immediately by means of an emergency Release of process, software or documentation (known as a Patch). If Qwest and CLEC deem implementation is not timely, and a work around exists or can be developed, Qwest will implement the work around in the interim. Severity 3 and Severity 4 IT trouble tickets may be implemented when appropriate taking into consideration upcoming Patches, Major Releases and Point Releases and any synergies that exist with work being done in the upcoming Patches, Major Releases and Point Releases.

Qwest will attempt to make a software patch when the system is not working as defined in the technical specifications and/or the GUI systems documentation (excluding PCAT documentation), and issue an event notification clearly defining the change.

If Qwest determines that a software patch is not feasible, and/or Qwest or any CLEC identifies a Patch Release of software or related systems documentation changes that may impact CLEC production coding, Qwest will issue an event notification, initiate a Technical Escalation, and request a joint meeting between Qwest and the CLECs in order to discuss the particular Patch Release. Qwest will notify CLECs of the joint meeting in which Qwest will review the Patch Release, the proposed solution, and the variables which affect the resolution. In all instances, these joint meetings are exempt from the five (5) business day advance notification requirement described in Section 3.0.

At this joint meeting, Qwest and the impacted CLECs will discuss how the pending Patch Release will affect their code. Qwest and the impacted CLECs will discuss any potential resolution options and implementation timeframes. In the event that agreement cannot be reached between Qwest and the impacted CLECs regarding the type of Patch Release to be implemented, the parties will attempt to negotiate an appropriate workaround.

The first time a trouble is reported by Qwest or CLEC, the Qwest IT Help Desk will assign an IT Trouble Ticket tracking number, which will be communicated to the CLEC at the time the CLEC reports the trouble. The affected CLEC(s) and Qwest will attempt to reach agreement on resolution of the problem and closing of the IT Trouble Ticket. If no agreement is reached, any party may use the Technical Escalation Process, http://www.qwest.com/wholesale/systems/productionsupport.html. When the IT Trouble Ticket has been closed, Qwest will notify CLECs with one of the following disposition codes:

- No Trouble Found – to be used when Qwest investigation indicates that no trouble exists in Qwest systems.
- Trouble to be Resolved in Patch – to be used when the IT Trouble Ticket will be resolved in a Patch. Qwest will provide a date for implementation of the Patch. This is typically applied to Severity 1 and Severity 2 troubles, although Severity 3 and Severity 4 troubles may be resolved in a Patch where synergies exist.
- CLEC Should Submit CMP CR – to be used when Qwest's investigation indicates that the System is working pursuant to the Technical Specifications (unless the Technical

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Specifications are incorrect), and that the IT Trouble Ticket is requesting a systems change that should be submitted as a CMP CR.

- Resolved – to be used when the IT Trouble Ticket investigation has resolved the trouble.

If Qwest has identified the source of a problem for a Severity 3 or Severity 4 IT Trouble Ticket but has not scheduled the problem resolution, Qwest may place the trouble ticket into a "Date TBD" status, but will not close the trouble ticket. Once a trouble ticket is placed in "Date TBD" status, Qwest will no longer issue status notifications for the trouble ticket. Instead, Qwest will track "Date TBD" trouble tickets and report status of these trouble tickets on the CMP Web site and in the Monthly CMP Systems Meeting. When a "Date TBD" trouble ticket is scheduled to be resolved in a Patch, Release or otherwise, Qwest will issue a notification announcing that the trouble ticket will be resolved and remove the trouble ticket from the list reported on the CMP Web site and in the Monthly CMP Systems Meeting.

For "Date TBD" trouble tickets, either Qwest or a CLEC may originate a Change Request to correct the problem. (See Section 5.0 for CR Origination.) If the initiating party knows that the CR relates to a trouble ticket, it will identify the trouble ticket number on the CR.

Instances where Qwest or CLECs misinterpret Technical Specifications and/or business rules must be addressed on a case-by-case basis. All parties will take all reasonable steps to ensure that any disagreements regarding the interpretation of a new or modified OSS Interface are identified and resolved during the change management review of the Change Request.

12.4 Reporting Trouble to IT

Qwest will open a trouble ticket at the time the trouble is first reported by CLEC or detected by Qwest. The ITWSHD Tier 1 will communicate the ticket number to the CLEC at the time the trouble is reported. Once a trouble ticket is opened at the ITWSHD, a CLEC or Qwest may request that the Event Notification process begin on the ticket as described in section 12.6.

If a ticket has been opened, and subsequent to the ticket creation, CLECs call in on the same problem, and the ITWSHD recognizes that it is the same problem, a new ticket is not created. The ITWSHD documents each subsequent call in the primary IT trouble ticket.

If one or more CLECs call in on the same problem, but it is not recognized as the same problem, one or more tickets may be created. When the problem is recognized as the same, one of the tickets becomes the primary ticket, and the other tickets are linked to the primary ticket. The ITWSHD provides the primary ticket number to other reporting CLECs. A CLEC can request its ticket be linked to an already existing open IT ticket belonging to another CLEC. When the problem is closed, the primary and all related tickets will be closed.

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12.4.1 Systems Problem Requiring a Workaround

If a CLEC is experiencing problems with Qwest because of a system "issue", the CLEC will report the trouble to the ITWSHD. The ITWSHD will create a trouble ticket as outlined above.

The ITWSHD Tier 1 will refer the ticket to the IT Tier 2 or 3 resolution process. If, during the resolution process, the Tier 2 or 3 resolution team determines that a workaround is required ITWSHD (with IT Tier 2 or 3 on the line, as appropriate) will contact the CLEC to develop an understanding of how the problem is impacting the CLEC. If requested and available, the CLEC will provide information regarding details of the problem, e.g., reject notices, LSRs, TNs or circuit numbers. Upon understanding the problem, the IT Tier 1 agent, with the CLEC on the line, will contact the ISC Help Desk and open a Call Center Database Ticket. The IT Tier 2 or 3 resolution team along with the WSD Tier 2 team, and other appropriate SMEs, (Resolution Team) will develop a proposed work around. The WSD Tier 2 team will work collaboratively with the CLEC(s) reporting the issue to finalize the work around. The ITWSHD will provide the CLEC and the WSD Tier 2 team with the IT Trouble Ticket number in order to cross-reference it with the Call Center Database Ticket. The ITWSHD will also record the Call Center Database Ticket number on the IT Trouble Ticket. The CLEC will provide both teams with primary contact information. If the CLEC and Qwest cannot agree upon the work around solution, the CLEC can use either the Technical Escalation process or escalate to the WSD Tiers, as appropriate. Qwest will use its best efforts to retain the CLEC's requested due dates, regardless of whether a work around is required.

12.5 Severity Levels

Severity level is a means of assessing and documenting the impact of the loss of functionality to CLEC(s) and impact to the CLEC's business. The severity level gives restoration or repair priority to problems causing the greatest impact to CLEC(s) or its business.

Guidelines for determining severity levels are listed below. Severity level may be determined by one or more of the listed bullet items under each Severity Level (the list is not exhaustive). Examples of some trouble ticket situations follow. Please keep in mind these are guidelines, and each situation is unique. The IT Help Desk representative, based on discussion with the CLEC, will make the determination of the severity level and will communicate the severity level to the CLEC at the time the CLEC reports the trouble. If the CLEC disagrees with the severity level assigned by the IT Help Desk personnel, either on the initial call or at any time while the ticket is open, a CLEC may request the ITWSHD to change the severity level, identifying the reason for the change in severity. If Qwest questions the validity of the change in severity, Qwest will contact the CLEC Severity Escalation Contact who raised the severity for clarification.

Severity 1: Critical Impact

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- Critical.
- High visibility.
- A large number of orders or CLECs are affected.
- A single CLEC cannot submit its business transactions.
- Affects online commitment.
- Production or cycle stopped – priority batch commitment missed.
- Major impact on revenue.
- Major component not available for use.
- Many and/or major files lost.
- Major loss of functionality.
- Problem can not be bypassed.
- No viable or productive work around available.

Examples:

- Major network backbone outage without redundancy.
- Environmental problems causing multiple system failures.
- Large number of service or other work order commitments missed.
- A Software Defect in an edit which prevents any orders from being submitted.

Severity 2: Serious Impact

- Serious
- Moderate visibility
- Moderate to large number of CLECs, or orders affected
- Potentially affects online commitment
- Serious slow response times
- Serious loss of functionality
- Potentially affects production – potential miss of priority batch commitment
- Moderate impact on revenue
- Limited use of product or component
- Component continues to fail. Intermittently down for short periods, but repetitive
- Few or small files lost
- Problems may have a possible bypass; the bypass must be acceptable to CLECs
- Major access down, but a partial backup exists

Examples:

- A single company, large number of orders impacted
- Frequent intermittent logoffs
- Service and/or other work order commitments delayed or missed

Severity 3: Moderate Impact

- Low to medium visibility

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- Low CLEC, or low order impact
- Low impact on revenue
- Limited use of product or component
- Single CLEC device affected
- Minimal loss of functionality
- Problem may be bypassed; redundancy in place. Bypass must be acceptable to CLECs
- Automated workaround in place and known. Workaround must be acceptable to CLECs

Example:

- Hardware errors, no impact yet

Severity 4: Minimal Impact

- Low or no visibility
- No direct impact on CLEC
- Few functions impaired
- Problem can be bypassed; bypass must be acceptable to CLECs
- System resource low; no impact yet
- Preventative maintenance request

Examples:

- Misleading, unclear system messages causing confusion for users
- Device or software regularly has to be reset, but continues to work

12.6 Status Notification for IT Trouble Tickets

There are two types of status notifications for IT Trouble Tickets:

- Target Notifications: for tickets that relate to only one reporting CLEC – Target Notifications may be communicated by direct phone calls
- Event Notifications: for tickets that relate to more than one CLEC or for reported troubles that Qwest believes will impact more than on e CLEC
- Event Notifications are sent by Qwest to all CLECs who subscribe to the IT Help Desk. Event Notifications will include ticket status (e.g., open, no change, resolved) and as much of the following information as is known to Qwest at the time the notification is sent:
  - Description of the problem
  - Impact to the CLECs (e.g., geographic area, products affected, business implications, other pertinent information available)
  - Estimated resolution date and time if known
  - Resolution if known
  - Severity level
  - Trouble ticket number(s), date and time
  - Work around if defined, including the Call Center Database Reference Ticket number

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- Qwest contact for more information on the problem
- System affected
- Escalation information as available

Both types of notifications will be sent to the CLECs and appropriate Qwest personnel within the time frame set forth in the table below and will include all related system trouble ticket number(s).

12.7 Notification Intervals

Qwest will distribute notifications during the IT Help Desk normal hours of operation (Monday-Friday 6:00 a.m. - 8:00 p.m. (MT) and Saturday 7:00 a.m. - 3:00 p.m. MT). Qwest will continue to work severity 1 problems outside of Help Desk hours of operation, and will communicate with the CLEC(s) as needed. A severity 2 problem may be worked outside the IT Help Desk normal hours of operation on a case-by-case basis.

Notification Intervals are based on the severity level of the ticket, the ticket's Disposition code (e.g., Initial, Update, Closure, etc.), and status changes.

The chart below indicates the response intervals a CLEC can expect to receive after reporting a trouble ticket to the IT Help Desk. Beginning with the issue's immediate acceptance as multi-CLEC impacting issue, Qwest will create and distribute the Initial notification.

Severity Level of Ticket	Response Interval for Status Changes	Response Interval for No Status Changes		Notification Interval upon Resolution
1	Within 1 hour	1 hour		Within 1 hour
2	Within 1 hour	1 hour		Within 1 hour
3	Within 4 hours	Workaround Provided	None. Only status ***changes*** will be communicated when a workaround is provided.	Within 4 hours
		No Workaround Provided	4 hours	
4	Within 24 hours	Workaround Provided	None. Only status ***changes*** will be communicated when a workaround is provided.	Within 4 hours
		No Workaround Provided	Every 48 hours.	

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"Notification Interval for Any Change in Status" means that a notification will be sent out within the time specified from the time a change in status occurs. Qwest will provide updates to those notifications that do not have a workaround until a workaround is established to inform the CLEC that a the issue is still under investigation. Qwest will not issue Updates when Qwest has provided a Workaround, but no change in status has occurred. "Notification Interval upon Resolution" means that a notification will be sent out within the time specified from the resolution of the problem.

12.8 Process Production Support

Process troubles encountered by CLECs will be reported, if at all, to the ISC Help Desk (Tier 0). In some cases the Qwest Service Manager (Tier 3) may report the CLEC trouble to the ISC Help Desk. Tier 0 will open a Call Center Database Ticket for all reported troubles.

12.8.1 Reporting Trouble to the ISC

The ISC Help Desk (Tier 0) serves as the first point of contact for reporting troubles that appear process related. Qwest has seven Tiers in Wholesale Service Delivery (WSD) for process Production Support. References to escalation of process Production Support issues means escalation to one of these seven tiers. Contact information is available through the Service Manager (Tier 3). The Tiers in WSD are as follows:

- Tier 0 – ISC Help Desk
- Tier 1 – Customer Service Inquiry and Education (CSIE) Service Delivery Coordinator (SDC)
- Tier 2 – CSIE Center Coaches and Team Leaders, Duty Pager, Process Specialist
- Tier 3 - Service Manager
- Tier 4 – Senior Service Manager
- Tier 5 – Service Center Director
- Tier 6 – Service Center Senior Director

A CLEC may, at any point, escalate to any of the seven Tiers.

If a CLEC is experiencing troubles with Qwest because of a process issue, the CLEC will report the trouble to Tier 0. Tier 0 will attempt to resolve the trouble including determining whether the trouble is a process or systems issue. To facilitate this determination, upon request, the CLEC will provide, by facsimile or e-mail, documentation regarding details of the trouble, e.g., reject notices, LSRs, TNs or circuit numbers if available. Tier 0 will create a Call Center Database Ticket with a two (2) hour response commitment ("out in 2 hour" status), and provide the ticket number to the CLEC. If Tier 0 determines that the trouble is a systems issue, they will follow the process described in Section 12.8.4. With respect to whether the trouble is a systems or

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process issue, a CLEC may escalate to Tier 1 before the Tier 0 follows the process outlined in Section 12.8.4.

If Tier 0 does not determine that the trouble is a systems issue or is not able to resolve the trouble, Tier 0 will offer the CLEC the option of either a warm transfer to Tier 1 (with the CLEC on the line), or have Qwest place the Call Center Database Ticket into the Tier 1 work queue. Tier 1 will then analyze the ticket and attempt to resolve the trouble or determine if the trouble is a systems or a process issue. If the trouble is a process issue, Tier 1 will notify the Tier 2 process specialist. Tier 2 process specialist will notify all call handling centers (Tier 0, Tier 1 and Tier 2 at each center) of the reported trouble and current status. If Tier 1 determines that the trouble is a systems issue, they will follow the process described in Section 12.8.4.

The reporting CLEC(s) and Qwest will attempt to reach agreement on resolution of the trouble. This resolution includes identification of processes to handle affected orders reported by the CLEC and orders affected but not reported. If Qwest and the CLEC determine that the trouble can be resolved in a timely manner, Qwest will status the CLEC every 2 hours by telephone, unless otherwise agreed, until the trouble is resolved to the CLEC's satisfaction. If, at any point, the parties conclude that they are unable to resolve the trouble in a timely manner, the CLEC and Qwest will proceed to develop a work around, as described below. At any point, the reporting CLEC may elect to escalate the issue to a higher Tier.

Except in a work around situation, see Section 12.8.3, once the trouble is resolved and all affected orders have been identified and processed, Qwest will seek CLEC agreement to close the ticket(s). If agreement is not reached, CLEC may escalate through the remaining Tiers.

After ticket closure, if the CLEC indicates that the issue is not resolved, the CLEC contacts Tier 2 and refers to the applicable ticket number. Tier 2 reviews the closed ticket, opens a new ticket, and cross-references the closed ticket.

Qwest will use its best efforts to retain the CLEC's requested due dates.

12.8.2 Multiple Tickets

If one or more CLECs call in multiple tickets, but neither the CLECs nor Qwest recognize that the tickets stem from the same trouble, one or more tickets may be created.

Qwest will attempt to determine if multiple tickets are the result of the same process trouble. Also, after reporting a trouble to Tier 0, a CLEC may determine that the same problem exists for multiple orders and report the association to Tier 0. In either case, when the association is identified, Tier 0 will designate one ticket per CLEC as a primary ticket, cross-reference that CLEC's other tickets to its primary ticket and provide the primary ticket number to that CLEC. Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and Service Managers (Tier 3) of the issue.

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Once a primary ticket is designated for a CLEC, the CLEC need not open additional trouble tickets for the same type of trouble. Any additional trouble of the same type encountered by the CLEC may be reported directly to Tier 2 with reference to the primary ticket number.

Qwest will also analyze the issue to determine if other CLECs are impacted by the trouble. If other CLECs are impacted by the trouble, within 3 business hours after this determination, the Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Managers (Tier 3) of the issue and the seven digit ticket number for the initial trouble ticket (Reference Ticket). At the same time, Qwest will also communicate information about the trouble, including the Reference Ticket number, to the impacted CLECs through the Event Notification process, as described in Section 12.6. If other CLECs experience a trouble that appears related to the Reference Ticket, the CLECs will open a trouble ticket with Tier 0 and provide the Reference Ticket number to assist in resolving the trouble.

12.8.3 Work Arounds

The reporting CLEC(s) and Qwest will attempt to reach agreement on whether a workaround is required and, if so, the nature of the work around. For example, a work around will provide a means to process affected orders reported by the CLEC, orders affected but not reported, and any new orders that will be impacted by the trouble. If no agreement is reached, the CLEC may escalate through the remaining Tiers.

If a work around is developed, Tier 1 will advise the CLEC(s) and the Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Manager (Tier 3) of the work around and the Reference Ticket number. Tier 1 will communicate with the CLEC(s) during this affected order processing period in the manner and according to the notification timelines established in Section 12.8.1. After the work around has been implemented, Tier 1 will contact the CLECs who have open tickets to notify them that the work around has been implemented and seek concurrence with the CLECs that the Call Center Database tickets can be closed. The closed Reference Ticket will describe the work around process. The work around will remain in place until the trouble is resolved and all affected orders have been identified and processed.

Once the work around has been implemented, the associated tickets are closed. After ticket closure, CLEC may continue to use the work around. If issues arise, CLEC may contact Tier 2 directly, identifying the Reference Ticket number. If a different CLEC experiences a trouble that appears to require the same work around, that CLEC will open a Call Center Data base ticket with Tier 0 and provide the Reference Ticket number for the work around.

12.8.4 Transfer Issue from WSD to ITWSHD

CLECs may report issues to the ISC Help Desk (Tier 0) that are later determined to be systems issues. Once the ISC Help Desk or higher WSD Tier determines that the issue is the result of a

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system error, that Tier will contact the CLEC and ask if the CLEC would like that Tier to contact the ITWSHD to report the system trouble. If the CLEC so requests, the Tier agent will contact the ITWSHD, report the trouble and communicate the Call Center Database Ticket to the ITWSHD agent with the CLEC on the line. The ITWSHD agent will provide the CLEC and the WSD agent with the IT Trouble Ticket number. The IT Trouble Ticket will be processed in accordance with the Systems Production Support provisions of Section 12.0.

12.9 Communications

When Call Center Database and IT Trouble Tickets are open regarding the same trouble, the IT and WSD organizations will communicate as follows. The WSD Tier 2 Process Specialists will be informed of the status of IT Trouble Tickets through ITWSHD system Event Notifications. Additionally, WSD Tier 2 has direct contact with the ITWSHD as a participant on the Resolution Team, as necessary. As the circumstances warrant, the WSD Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Manager (Tier 3) of the information pertinent to ongoing resolution of the trouble.

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13.0 TRAINING

Qwest will incorporate all substantive changes to existing Graphical User Interfaces (GUI), including the introduction of new GUI, into CLEC training programs. Qwest will execute CLEC training for pre-order, ordering, billing, and maintenance and repair GUIs.

13.1 Introduction of a New GUI

Qwest will include a CLEC training schedule with the Initial Release Notification for the introduction of a new GUI issued in accordance with the interval specified in Section 7.0. Qwest will make available CLEC training beginning no less than twenty-one (21) calendar days prior to the Release Production Date. Web based training will remain available for the life of the Release.

13.2 Changes to an Existing GUI

Qwest will include a CLEC training schedule with the Draft Release Notes issued for a change to an existing GUI in accordance with the interval specified in Section 8.0. Qwest will make available CLEC training beginning no less than twenty-one (21) calendar days prior to the Release Production date. Web based training will remain available for the life of the Release.

CEMR training will not be available before the Release Production Date but will be conducted for ninety (90) days in the live environment after the Release Production date.

13.3 Product and Process Introductions and Changes

Qwest may offer CLEC training for product and process introductions and changes based on the complexity of the introduction or change. This training is offered in many forms, but is most commonly offered in the following delivery methods: Web-based, instructor-led, job aids, or conference calls.

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14.0 ESCALATION PROCESS

14.1 Guidelines

- The Escalation Process will include items that are defined as within the CMP scope.
- The decision to escalate is left to the discretion of the CLEC, based on the severity of the missed or unaccepted response/resolution.
- Escalations may also involve issues related to CMP itself, including the administration of this CMP.
- The expectation is that escalation should occur only after Change Management procedures have occurred per this CMP.

14.2 Cycle

Item must be formally escalated through the CMP Web site, http://www.qwest.com/wholesale/cmp/escalations_dispute.html. Alternatively, the issue may be escalated by sending an e-mail to the Qwest CMP escalation e-mail address cmpesc@qwest.com.

- Subject line of the escalation e-mail must include:
  - CLEC Company name
  - "ESCALATION"
  - Change Request (CR) number and status, if applicable
- Content of e-mail must enclose appropriate supporting documentation, if applicable, and to the extent that the supporting documentation does not include the following information, the following must be provided:
  - Description of item being escalated
  - History of item
  - Reason for Escalation
  - Business need and impact
  - Desired CLEC resolution
  - CLEC contact information including Name, Title, Phone Number, and e-mail address
  - CLEC may request that impacted activities be stopped, continued or an interim solution be established.
- Qwest will acknowledge receipt of the complete escalation e-mail with an acknowledgement of the e-mail no later than the close of business of the following business day. If the escalation e-mail does not contain the preceding specified information Qwest will notify the CLEC by the close of business on the following business day, identifying and requesting information that was not originally included.
- When the escalation e-mail is complete, the acknowledgement e-mail will include:
  - Date and time of escalation receipt
  - Date and time of acknowledgement e-mail
  - Name, phone number and e-mail address of the Qwest Director, or above, assigned to the escalation.
- Qwest will post escalated issue and any associated responses on the CMP Web site within one (1) business day of receipt of the complete escalation or response.

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- Qwest will give notification that an escalation has been requested via the Industry Mail Out process
- Any other CLEC wishing to participate in the escalation may do so by selecting the participate button adjacent to the escalation on the CMP Escalation Web site, http://www.qwest.com/wholesale/cmp/escalations.html, within one (1) business day of the mail out. Alternately, a CLEC may participate by sending an e-mail to cmpesc@qwest.com within one business day of the Qwest notification. The subject line of the e-mail must include the title of the escalated issue followed by "ESCALATION PARTICIPATION."
- If Qwest determines a CLEC meeting is needed to further discuss the escalation, and upon agreement by the originating CLEC, Qwest will also invite the CLECs that chose to participate in the escalation. The meeting will not require 5 day advance notification due to the escalation time constraints.
- Qwest will respond to the originating CLEC and copy the participating CLECs, with a binding position e-mail including supporting rationale as soon as practicable, but no later than:
  - For escalated CRs, seven (7) calendar days after sending the acknowledgment e-mail,.
  - For all other escalations, fourteen (14) calendar days after sending the acknowledgment e-mail.
- The escalating CLEC will respond to Qwest within seven (7) calendar days with a binding position e-mail.
- When the escalation is closed, the resolution will be subject to this CMP

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15.0 DISPUTE RESOLUTION PROCESS

CLECs and Qwest will work together in good faith to resolve any issue brought before this CMP. In the event that an impasse issue develops, a party may pursue the dispute resolution processes set forth below:

- Item must be formally identified through the CMP Web site, http://www.qwest.com/wholesale/cmp/escalations_dispute.html. Alternately, a party may send an e-mail to the Qwest CMP Dispute Resolution e-mail address, cmpdisp@qwest.com. Subject line of the e-mail must include:
  - CLEC Company name
  - "Dispute Resolution"
  - Change Request (CR) number and status, if applicable
- Content of e-mail must include appropriate supporting documentation, if applicable, and to the extent that the supporting documentation does not include the following information, the following:
  - Description of item
  - History of item
  - Reason for Escalation
  - Business need and impact
  - Desired CLEC resolution
  - CLEC contact information including Name, Title, Phone Number, and e-mail address
  - Qwest will acknowledge receipt of the complete Dispute Resolution e-mail within one (1) business day
- Qwest or any CLEC may suggest that the issue be resolved through an Alternative Dispute Resolution (ADR) process, such as arbitration or mediation using the American Arbitration Association (AAA) or other rules. If the parties agree to use an ADR process and agree upon the process and rules to be used, including whether the results of the ADR process are binding, the dispute will be resolved through the agreed-upon ADR process.
- Without the necessity for a prior ADR Process, Qwest or any CLEC may submit the issue, following the commission's established procedures, with the appropriate regulatory agency requesting resolution of the dispute. This provision is not intended to change the scope of any regulatory agency's authority with regard to Qwest or the CLECs.

This process does not limit any party's right to seek remedies in a regulatory or legal arena at any time.

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16.0 EXCEPTION PROCESS

Qwest and CLECs recognize the need to allow occasional exceptions to this CMP described herein. Extenuating circumstances affecting Qwest or the CLECs may warrant deviation from this CMP. An exception request will be addressed on a case-by-case basis where Qwest and CLECs may decide to handle the exception request outside of the established CMP. An exception request must be presented to the CMP community for acceptance in accordance with this section to determine if the request shall be treated as an exception.

16.1 Exception Initiation and Acknowledgement

If Qwest or a CLEC wishes that any request within the scope of CMP be handled on an exception basis, the party who makes such a request will issue an exception request ("Exception Request"). Exception Requests will be submitted in one of two ways:

- If the request pertains to a single, previously submitted, open CR, the Exception Requestor must follow the process described in Section 16.1.1.
- If the Exception Request is not currently addressed in a single, previously submitted, open CR or if the request involves two or more previously submitted, open CRs, the Exception Requestor must complete a CR form and e-mail it to the CMP Manager, cmpcr@qwest.com. The Exception Requestor must complete the following sections of the CR form: date submitted, company, originator, proprietary (if applicable), optional available dates/times for meetings, area of request, description of exception requested. The description of the exception must contain the information listed in Section 16.1.1.

16.1.1 Requestor Submits an Exception Request

If the Exception Request pertains to a previously submitted CR, the Exception Requestor must send an e-mail to the CMP Manager, cmpcr@qwest.com, with "EXCEPTION" in the subject line. The text of the request must contain the following information:

- Change Request number(s) of an existing Change Request(s) or a completed Change Request form (See Section 5.0)
- Description of the request with good cause for seeking an exception
- A clear statement outlining the course of action the Exception Requestor wishes parties to follow and the desired outcome, if the Exception Request is granted (e.g., timeframe or targeted release)
- Supporting documentation
- Primary contact information
- Whether the Requestor wishes to have the request considered at the next Monthly CMP Meeting, or requests an Exception Call/Meeting pursuant to Section 16.2 prior to the next Monthly CMP Meeting
- If a CLEC requests an Exception Call/Meeting, the CLEC should indicate whether it desires a pre-meeting with Qwest, including the CLEC's desire to have certain Qwest subject matter experts attend the pre-meeting and/or Exception Call/Meeting.

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16.1.2 Tracking of an Exception Request

Exception Requests will be identified by adding the suffix "EX" to the CR number. If an Exception Request references existing CRs, and the Exception Request is granted, the CR numbers of the referenced CRs will then be modified to include the "EX" suffix.

Within one (1) business day after receipt of an Exception Request, Qwest's CMP Manager will acknowledge receipt of the Exception Request by e-mail to the Requestor. The CMP Manager will include in the acknowledgement an indication of whether an Exception Call/Meeting will be scheduled. If an Exception Call/Meeting is not requested, the Exception change request will be presented to the CMP community as described in Section 16.3 below. The acknowledgement will also include the CR or tracking number.

16.2 Exception Notification

Within three (3) business days after receipt of the request, if an Exception Call/Meeting is requested, the CMP Manager will issue a notification to the CMP community for an Exception Call/Meeting (the "Exception Notification"). The Exception Call/Meeting shall be held on a date agreed to by the Requestor, provided that it shall not be held less than seven (7) business days after issuance of the Exception Notification.

The subject line of the Exception Notification must include:

- "EXCEPTION NOTIFICATION"

The content of the Exception Notification will include:

- Requestor
- Logistics for Exception Call/Meeting
- Agenda
- Change Request number on which the exception is sought
- Description of the request with good cause for seeking an exception
- Desired outcome (e.g., timeframe or targeted release)
- Supporting documentation
- Primary contact information
- A clear statement that a decision is required to accept, or decline this request as an Exception during this Exception Call/Meeting.
- Logistics for a pre-meeting, in accordance with Section 16.2.1
- An initial assessment from Qwest regarding the impact if the Exception Request is granted, if available.

16.2.1 Pre-Meeting

The pre-meeting shall be held on a date agreed to by the Requestor, provided that it shall not be held less than two (2) business days after issuance of the Exception Notification. Qwest shall conduct the pre-meeting with the Exception Requestor, any CLECs that wish to participate, Qwest SMEs, and specially requested Qwest personnel, or their equivalents. In all instances, the pre-

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meeting is exempt from the five (5) business day advance notification requirement described in Section 3.0. The purpose of the pre-meeting is to enable Qwest and CLECs to discuss options for the vote, determine the additional SMEs to invite to the Exception Call/Meeting, and develop a clear statement delineating what "Yes" and "No" votes will mean.

No later than three (3) business days following the pre-meeting, Qwest will distribute an Exception Voting Notification. The subject line of the notification will contain:

- "PRE-MEETING RESULTS – VOTING INSTRUCTIONS"

The body of the notification will contain:

- A clear statement outlining the course of action parties will follow if the Exception Request is granted
- A description of any modifications to the Exception Request made during the pre-meeting
- A clear statement delineating what "Yes" and "No" votes will mean
- Logistics for the Exception Meeting or the Monthly CMP Meeting, at which the vote will be held
- Logistics for additional pre-meetings, if applicable

16.2.2 Conduct Exception Call/Meeting

Qwest will conduct the Exception call/meeting to allow the Requestor to clarify the Exception Request. The Exception Requestor shall present the request and provide good cause as to why such a request should be treated as an exception. Qwest and CLECs present will be given the opportunity to comment on the request. Discussion may also include substantive issues and potential solutions, and schedules for subsequent activities (e.g., meeting, deliverables, milestones, and implementation dates). After the discussion, Qwest will conduct a vote as described in Section 16.4.

Qwest will write, distribute and post minutes as part of the Exception Request Disposition Notification no later than five (5) business days after the Exception Call/Meeting. The minutes will include the disposition and schedule of the implementation of the Exception Request.

16.3 Notification of Exception Request Discussion and Vote at Upcoming Monthly CMP Meeting

If an Exception Requestor desires that the vote be taken at the next Monthly CMP Meeting, the Exception Request must be submitted no later than thirteen (13) business days prior to that Monthly CMP Meeting. If an Exception Call/Meeting is not requested by the Exception Requestor, within three (3) business days after receipt of the request Qwest will notify the CLECs by e-mail that an Exception Request has been received by the CMP Manager.

The subject line of the notification must include:

- "EXCEPTION NOTIFICATION"

The notification content shall include:

- Requestor

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- Change Request number on which the exception is sought
- Description of the request with good cause for seeking an exception
- Desired outcome (e.g., timeframe or targeted release)
- Supporting documentation
- A clear statement that this request will be discussed and a decision is required to accept, or decline this request as an Exception, at the upcoming Monthly CMP Meeting
- Logistics for a pre-meeting, in accordance with Section 16.2.1
- An initial assessment from Qwest regarding the impact if the Exception Request is granted, if available

16.3.1 Discussion and Vote Taken at the Monthly CMP Meeting

If an Exception Call/Meeting is not requested, Qwest will note on the agenda of the next Monthly CMP Meeting that an Exception Request has been submitted, and that a decision is required to accept or decline this request as an Exception. Qwest will include the Exception Request and supporting documentation as part of the Monthly CMP Meeting distribution package.

The Exception Requestor shall present the request and provide good cause as to why such a request should be treated as an exception. Qwest and CLECs present will be given the opportunity to comment on the request. Discussion may also include substantive issues and potential solutions, and schedules for subsequent activities (e.g., meeting, deliverables, milestones, and implementation dates). After the discussion, Qwest will conduct a vote as described in Section 16.4.

16.4 Vote on Exception Request

A vote on whether an Exception Request will be handled on an exception basis will take place at the Exception Call/Meeting, if one is held (See Section 16.2.2). If an Exception Call/Meeting is not held, the vote will be taken at the Monthly CMP Meeting (See Section 16.3.1). The standards for determining whether a request will be handled on an exception basis are as follows:

- If the Exception Request is for a general change to the established CMP timelines for Product/Process changes, a two-thirds majority vote will be required unless Qwest or a CLEC demonstrates, with substantiating information, that one of the criteria for denial set forth in Section 5.3 is applicable. If one of the criteria for denial is applicable, the request will not be treated as an exception.
- If the Exception Request is for a Systems change or seeks to alter any part of this CMP (other than a particular instance of a Product/Process timeline change), a unanimous vote will be required.

Voting will be conducted pursuant to Section 17.0.

Any party that disagrees with results of a vote may initiate dispute resolution pursuant to the CMP Dispute Resolution provisions.

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16.5 Exception Request Disposition Notification

Qwest will issue a disposition notification, including meeting minutes, within five (5) business days after the close of the Exception Call/Meeting, or the Monthly CMP Meeting, at which the vote was taken. The disposition notification will be posted on the Web site.

16.6 Processing of the Exception Disposition

If the outcome of the vote is to grant the Exception Request, then Qwest may proceed with the agreed to disposition. If the outcome of the vote is not to treat the proposed change as an Exception, the originator may withdraw the Exception designation and continue to pursue its change under the established CMP. The originator of the change may also withdraw the change and discontinue pursuit of the requested change.

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17.0 VOTING

When a vote is called, Qwest and CLECs will follow the procedures described below, unless otherwise specified in this CMP.

The Qwest CMP Manager will schedule and hold a discussion call/meeting (if not pursuant to a Monthly CMP Meeting), issue an agenda with any supporting material, and conduct the vote as described below on the open issue. The agenda will be distributed and posted on the web site in advance of the call/meeting as also described below.

The results of the vote will be published, using the voting tally form (refer to Appendix F).

A total of 51% or more of the votes in favor of (or against) a proposal shall constitute a Majority in this CMP.

The standard for the determination of all issues put to a vote under this CMP is the decision of the Majority, except where a different voting standard is expressly stated in this CMP for a particular issue.

17.1 Voter

A Voter is any of the POCs designated under Section 2.2. Additionally, any CLEC POC may designate another member of its company or a third party as an interim POC to vote, for a specific vote, in the absence of the primary, secondary, and tertiary POCs. A third party vote must be accompanied by one of the following two valid forms of documentation (e-mail authorization or Letter of Authorization (LOA)). The e-mail must be sent to the CMP Manager, cmpcr@qwest.com, no later than two (2) hours before the meeting at which the vote will take place. The interim POC may provide an LOA to Qwest at the meeting, prior to the vote.

If an e-mail or LOA is provided to designate a third party interim POC, it must contain the following information in the subject line of the e-mail:

- "Voting Proxy"

The body of the e-mail or LOA must contain the following information:

- CLEC Name
- Third Party Company Name
- Brief description of the issue on which the vote is being taken
- Date vote call/meeting is scheduled to be held
- Signature of authorizing Carrier (LOA only)

If a meeting is scheduled for a vote but a vote is not taken, e-mailed designations or LOAs will be discarded.

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17.2 Participation in the Vote

Any Carrier that is authorized to provide local services in any one of Qwest's 14-state region may qualify as a Voter.

A Voter may participate in the vote in person, over the phone, or via e-mail ballot, as described in Section 17.4.3.

17.2.1 A Carrier is Entitled To a Single Vote

Each Carrier (Qwest or CLEC) is entitled to a single vote regardless of any affiliates. For example, at the time of this writing, WorldCom has several entities offering local services throughout the Qwest region (e.g., MFS, Brooks Fiber, MCI Metro, etc.). WorldCom would be entitled to one vote for all of these affiliates.

17.3 Notification of Vote

Qwest will notify CLECs by email within one (1) business day after determining when a vote on a specific issue must occur. This notification will in no event be less than five (5) business days before the call. The subject line of notification will be identified as "VOTE REQUIRED/Title of Issue." Within one (1) business day after issuing the notification, the notification and any supporting material will be posted on the web site.

17.3.1 Notification Content

When a notification is issued, the notification will be issued as a CMP notification and will consist of:

- a description of the issue and reason for calling a vote
- date and time of the voting call/meeting
- bridge number for the voting call, or logistics for the meeting
- supporting material, if any
- the deadline date and time for submitting e-mail votes

17.4 Voting Procedures

17.4.1 Quorum

At any CMP call/meeting where a vote is to be taken, a quorum of Carriers, as described in Section 17.2.1, (Qwest and CLEC) must be present. A quorum will be established as follows:

- Qwest and CLECs will determine the average number of Carriers (including Qwest) at the last six days of Monthly CMP Meetings, excluding the highest and lowest attendance numbers (e.g. add the number of Carriers at the remaining four meetings and divide by four) ("Average Number of Carriers").
- If 62.5% or more of the Average Number of Carriers is present, a quorum has been established. For purposes of establishing a quorum, a Carrier not participating in the meeting

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is considered present if it submitted an e-mail vote by the time designated in the notification of vote.

- When calculating the average number of Carriers and establishing quorum, Qwest will round to the nearest whole number; *i.e.,* Qwest will round a number ending in 0.5 and above to the higher whole number, and round a number ending below 0.5 to the lower whole number.

If a quorum is not present at a call/meeting when a vote is scheduled to be taken, the vote shall be postponed until such time as a quorum is established.

In the case of an Exception request, if a quorum is not established at the Exception all/Meeting, the vote shall be postponed for three (3) business days for a second Exception Call/Meeting. At the second Exception Call/Meeting, a vote will be taken regardless of whether a quorum is established. Prior to the second Exception Call/Meeting, Qwest will distribute a notification stating that at this meeting a vote will take place regardless of whether a quorum is established, and that votes will be accepted in accordance with Sections 17.1 and 17.4.1.

17.4.2 Casting Votes

Once a quorum is established, Qwest will ask for all Voters to place their vote by writing their vote and their company name on a piece of paper. The vote will be either a "Yes," "No" or "Abstain." When all companies have completed their votes, Qwest will collect the ballots. Voters attending by telephone will e-mail their vote to cmpcr@qwest.com, in accordance with Section 17.4.3. After collection of ballots Qwest will read aloud all votes received and collected. If a POC on the phone wishes to vote, but does not have access to a computer, Qwest will arrange with that POC a method to receive its vote. Only votes of "Yes" and "No" will count toward calculating a majority or unanimous decision.

17.4.3 E-mail Ballots

CLECs wishing to e-mail their vote to Qwest may do so by sending an e-mail to the Qwest CMP Manager, cmpcr@qwest.com. E-mail votes will only be accepted, and included in the tally of the votes, if received prior to the official close of voting during the voting call/meeting.

The subject line of the e-mail must include the following:

- "CLEC BALLOT"
- CLEC Name
- Representative Name

The body of the e-mail must include the following:

- CLEC Name
- Representative Name
- Brief description of the issue on which the vote is being taken
- Date vote call/meeting is scheduled to be held
- CLEC vote

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If a meeting is scheduled for a vote but a vote is not taken, e-mailed votes will be discarded. In addition, CLECs who submitted votes by e-mail will be notified that no vote was taken, their votes were discarded, and that the vote may be taken again at a later date.

In the event a CLEC is present to vote, after submitting an e-mail ballot, such CLEC may cast its vote at the call/meeting regardless of the e-mail ballot.

17.4.4 Voting Tally Form

The Voting Tally Form serves as a collective record of the individual company vote. The results of the tally will be included in the meeting minutes as an attached document.

The form will include the following information:

- *Name of Call/Meeting*: The name of the call/meeting
- *Date of Vote*: The date of occurrence
- *Subject*: The topic or issue that is causing the vote
- *Voting Carrier*: The Carrier's company name
- *Voting Participant*: Write the name of the Voter that participates in a 'vote' and how the vote was cast: in person, by phone or by email
- *Yes*: Place an 'X' in box if agreed with proposed plan
- *No*: Place an "X" in box if party disagrees with proposed plan
- *Abstain*: Any participant may abstain to place a vote by placing an "X" in the box
- *Result*: Qwest shall record the results of the vote in this box

Qwest will announce the results of the vote, by an e-mail notification, no later than five (5) business days following the call/meeting. The result will be included in meeting minutes and posted on the web site.

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18.0 OVERSIGHT REVIEW PROCESS

Qwest or a CLEC may identify issues with this CMP using the Oversight Review Process. Issues submitted through this process may include:

- Improper notification under CMP
- No notification under CMP
- Issues regarding scope of CMP
- Failures to adhere to CMP
- Interpretations of CMP
- Gaps in CMP

This Oversight Review Process is optional. It will not be used when one or more processes documented in this CMP are available to obtain the resolution the submitter desires. The submitter is expected to use such available processes. If a submitter chooses to use this process, the following applies.

18.1 Guidelines

- A submitter must submit a issue for Oversight Review, as outlined in Section 18.2 or 18.4.4
- A submitter must raise issues within a reasonable period of time after the submitter becomes aware of an issue
- A response to an Oversight Review Issue may be that the resolution requested should be pursued under a different process in this CMP
- If the parties do not agree whether this process applies, the issue will be brought before the CMP Oversight Committee to determine whether the resolution sought by the submitter is available through this process or another documented process in this CMP

18.2 Issue Submission

An issue may be presented to the CMP body at a monthly CMP Meeting as part of the standing agenda item relating to the operation and effectiveness of CMP (*See* Section 2.1) or may be formally submitted by an e-mail to cmpesc@qwest.com and the CMP POC of the carrier that is the subject of the issue. If the issue is presented at a Monthly CMP Meeting and is not resolved, the submitter must follow the e-mail submission process.

In the event a party chooses to submit an e-mail as described above, the subject line of the issue submission e-mail must include:

- Company name
- "CMP OVERSIGHT REVIEW ISSUE SUBMISSION"

The submission e-mail must include appropriate supporting documentation, if applicable, and, to the extent that the supporting documentation does not include the following information, the following must be provided:

- Description of issue
- Basis for considering the matter an Oversight Review Issue

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- Citation from the Qwest Wholesale Change Management Document that addresses specific guidelines, if applicable
- Desired resolution
- Contact information including Name, Title, Phone Number, and e-mail address

Qwest must acknowledge receipt of the complete issue submission with an acknowledgement within one (1) business day. If the issue submission does not contain the above-specified information, Qwest must notify the submitter within one (1) business day, identifying and requesting information that was not originally included. When the issue submission is complete, the acknowledgement email will include:

- Date and time of issue submission receipt
- Date and time of acknowledgement email

Qwest must issue a notification announcing that an Oversight Review Issue has been submitted within two (2) business days after receipt of the complete issue e-mail submission. The subject of the notification will include "CMP OVERSIGHT REVIEW ISSUE SUBMISSION."

18.3 Issue Resolution

18.3.1 Response

The carrier cited in the original submission must respond by e-mail to cmpesc@qwest.com. Subject line of the Oversight Review issue response e-mail must include:

- Company name
- "CMP Oversight Review ISSUE RESPONSE"

The response e-mail must include appropriate supporting documentation, if applicable, and, to the extent that the supporting documentation does not include the following information, the following must be provided:

- Agreement/disagreement with the issue
- Reason for agreement/disagreement
- Citation from the Qwest Wholesale Change Management Process Document that addresses responding company position, if applicable
- Response to desired resolution, and alternative proposed resolution, if applicable
- Respondent contact information including Name, Title, Phone Number, and e-mail address

Qwest must distribute a notification with the contents of the response e-mail within two (2) business days of receipt. The subject of the notification must include "RESPONSE TO CMP OVERSIGHT REVIEW ISSUE."

18.3.2 Issue Meeting

If the submitter of the Oversight Review Issue is not satisfied with the response provided under Section 18.3.1, the submitter may request a meeting of Qwest and interested CLECs to discuss the issue. Such meeting will be held no later than five (5) business days after the submitter's meeting request. One of the matters to be addressed at this meeting is whether additional

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meetings should be held to address the issue. Such meetings will be open to all CLECs and Qwest shall provide advanced notification of such meetings pursuant to this CMP. Qwest will provide notification of the outcome of these discussions within two (2) business days after such discussions are concluded. The subject of the notification must include "OUTCOME OF CMP OVERSIGHT REVIEW ISSUE."

18.3.3 Election to Pursue Issue with CMP Oversight Committee

At any point in the process under Sections 18.2 or 18.3, a participant in the discussions of an Oversight Review issue may elect to pursue the issue with the CMP Oversight Committee by sending an email to cmpesc@qwest.com.

18.3.4 Escalation or Dispute Resolution

If any party is not satisfied with the outcome of this Section 18.3, it may follow the Escalation or Dispute Resolution Processes.

18.4 CMP Oversight Committee

18.4.1 Membership

The CMP Oversight Committee will be comprised of one representative from Qwest, one representative from each of up to six (6) CLECs, and one representative from each public utilities commission that wishes to participate. Members of the CMP Oversight Committee must have a comprehensive understanding of this CMP. Names of the members of the CMP Oversight Committee will be listed on the Qwest Wholesale CMP website at the following URL: http://www.qwest.com/wholesale/cmp/coc.html. The membership of the committee has been established through the end of 2003. For 2004 and each year thereafter, the CLEC membership will be established on an annual basis through self nomination. If more than six (6) CLECs are nominated for membership, the CLECs will rank the nominees. The six (6) highest ranked nominees will be the CLEC members of the committee for the following year.

18.4.2 Role of the CMP Oversight Committee

The CMP Oversight Committee will act as a subject matter expert regarding the provisions of this CMP. The CMP Oversight Committee will deliberate on CMP Oversight Review Issues and make recommendations to the CMP body on matters such as interpretation of this CMP and proposed changes to this CMP. A recommendation of the CMP Oversight Committee may result in a CR to change this CMP as contemplated by Section 2.1.

18.4.3 Meetings of the CMP Oversight Committee

Meetings of the CMP Oversight Committee will be called on an ad hoc basis, as needed to address CMP Oversight Review Issues as described in Section 18.4.4, and will be called in the same manner, and applying the same time periods, as set forth in Section 3.0, Change Management Process Meetings. A CMP Oversight Committee meeting may be held at the end of

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a scheduled monthly CMP Meeting. In addition to the CMP Oversight Committee members, other persons may participate in the CMP Oversight Committee meetings to assist the committee in understanding the issues; however, final recommendations to the CMP body may only be made by the CMP Oversight Committee members. In order to conduct a meeting of the CMP Oversight Committee, a majority of its members must be present in person or by teleconference.

18.4.4 Submission of Oversight Review issues to the CMP Oversight Committee

Oversight Review issues may be submitted to the CMP Oversight Committee in a number of ways:

- When parties disagree on the application of the Oversight Review Issue Submission Process to an issue that is raised (*See* Section 18.1)
- A party submitting a CMP Oversight Review Issue under Section 18.2, may direct that the issue be brought to the CMP Oversight Committee;
- During the process under Section 18.3, or once that process is completed, a CMP participant may raise the Oversight Review Issue to the CMP Oversight Committee;
- A CMP Oversight Review Issue may be referred to the CMP Oversight Committee during a Monthly CMP Meeting

18.4.5 CMP Oversight Review

Qwest must issue a notification announcing that a CMP Oversight Review Issue has been referred to the CMP Oversight Committee within two (2) business days after such referral is made. This notification will provide the information for the meeting of the CMP Oversight Committee. The subject of the notification will include "POTENTIAL CMP OVERSIGHT REVIEW ISSUE REFERRED TO THE CMP OVERSIGHT COMMITTEE." The notification will solicit from committee members and submitting carrier, dates during the next ten (10) calendar days on which they are available to meet to address the issue. Qwest will establish a meeting date will be established based on the members' and submitting carrier's availability.

18.4.6 Status and Recommendations of the CMP Oversight Committee

Status of outstanding Oversight Review issues will be provided at the monthly CMP meetings and will be posted on Qwest's Wholesale CMP website at the following URL: www.qwest.com/wholesale/coc.html. Recommendations of the CMP Oversight Committee will be distributed to the CMP by e-mail notification with a heading that includes "RECOMMENDATION OF THE CMP OVERSIGHT COMMITTEE." Such notifications will state the issue and briefly describe the recommendation and include a link to more detailed information about the issue. Recommendations of the CMP Oversight Committee will be included on the agenda for the next monthly CMP meeting for discussion by the CMP body. If there is not agreement on a single recommendation by the CMP Oversight Committee, the notification will include the competing recommendations discussed by the CMP Oversight Committee.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

APPENDIX A: SAMPLE - IMA 11.0 RANK ELIGIBLE CRS

#	CR Number	Interface	Submit Date	Company	Status	Title	Shirt Size	Est LOE Min	Est LOE Max	CR Presenter	Ranking Note
Category A: Not Rank Eligible											
1	14886	IMA Common	9/28/01	Qwest	Pending Withdrawal	Pre-order Transaction: Due Date availability & standard Intervals	Extra Large	5501	8000	Winston, Connie	Category A: Not Rank Eligible
2	23943	IMA Common	9/28/01	Qwest	Pending Withdrawal	Shared Distribution Loop- Long Term	Large	3001	5500	Winston, Connie	Category A: Not Rank Eligible
3	25505	IMA Common	9/28/01	Qwest	Pending Withdrawal	Line Splitting for UNE-P accounts	Large	3001	5500	Winston, Connie	Category A: Not Rank Eligible
4	25591	IMA Common	9/26/01	Qwest	Pending Withdrawal	Flowthrough validate LPIC LSR Entries	Medium	751	3000	Winston, Connie	Category A: Not Rank Eligible
5	25800	IMA Common	9/28/01	Qwest	Pending Withdrawal	Add New Auto Push Statuses	Medium	751	3000	Winston, Connie	Category A: Not Rank Eligible
6	27751	IMA Common	9/28/01	Qwest	Pending Withdrawal	Intrabuilding Cable.	Large	3001	5500	Winston, Connie	Category A: Not Rank Eligible
7	27756	IMA Common	9/26/01	Qwest	Pending Withdrawal	Cancellation Remarks	Small	201	750	Winston, Connie	Category A: Not Rank Eligible
Category B: Above the Line											
1	SCR013002-6	IMA Common	1/30/02	Qwest	Clarification	PID Impact - PO-2B: Unbundled Loop and Local Number Portability Edits	Large	3001	5500	Martain, Jill	Category B: Above the Line
2	SCR013002-7	IMA Common	1/30/02	Qwest	Clarification	PID Impact - PO-2B: Resale POTS Edits	Large	3001	5500	Martain, Jill	Category B: Above the Line
1	24652	IMA Common	9/28/01	Qwest	Presented	Unbundled DID/PBX Trunk Port Facility move from LS to PS	Medium	751	3000	Winston, Connie	Category C: Rank Eligible
2	25091	IMA Common	9/26/01	Qwest	Presented	DSL Flowthrough - Re-Branding	Large	3001	5500	Winston, Connie	Category C: Rank Eligible
3	26636	IMA Common	9/28/01	Qwest	Presented	Shared Loop Enhancements	Medium	751	3000	Winston, Connie	Category C: Rank Eligible
4	30212	IMA Common	9/28/01	Qwest	Presented	Add New UNE-P PAL to IMA	Large	3001	5500	Winston, Connie	Category C: Rank Eligible
5	30215	IMA Common	10/23/01	Qwest	Presented	Wholesale Local Exchange Freeze	Large	3001	5500	Winston, Connie	Category C: Rank Eligible
6	31766	IMA Common	9/28/01	Qwest	Presented	Reject Duplicate LSRs	Medium	751	3000	Martain, Jill	Category C: Rank Eligible
7	5043011	IMA GUI	8/31/00	Eschelon	Presented	Add an online glossary of the field title abbreviations to help menu of IMA GUI	Medium	751	3000	Eschelon	Category C: Rank Eligible

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

APPENDIX B: SAMPLE - IMA 11.0 INITIAL PRIORITIZATION FORM

Assigned Point Value (see instructions)	#	CR Number	Title	Company	Interface	Products Impacted	Shirt Size	Est LOE Min	Est LOE Max
	1	24652	Unbundled DID/PBX Trunk Port Facility move from LS to PS	Qwest	IMA Common	Unbundled PID/PBX Trunk Port	Medium	751	3000
	2	25091	DSL Flowthrough - Re-Branding	Qwest	IMA Common	DSL	Large	3001	5500
	3	26636	Shared Loop Enhancements	Qwest	IMA Common	Shared Loop	Medium	751	3000
	4	30212	Add New UNE-P PAL to IMA	Qwest	IMA Common	UNE-P PAL	Large	3001	5500
	5	30215	Wholesale Local Exchange Freeze Based on CSRs	Qwest	IMA Common	All	Large	3001	5500
	6	31766	Reject Duplicate LSRs	Qwest	IMA Common	All Products	Medium	751	3000
	7	5043011	Add an online glossary of the field title abbreviations to help menu of IMA GUI	Eschelon	IMA GUI	All Products	Medium	751	3000
	8	5043076	Create a separate field for line numbers in EDI responses	Eschelon	IMA EDI		Large	3001	5500
	9	5206704	Add OCn capable loop LSR to IMA	ELI	IMA Common	DS1, DS3 & OCn Loop Orders	Large	3001	5500
	10	5405937	CLECs require availability to view completed LSR information in IMA GUI	Verizon	IMA GUI	Resale	Large	3001	5500
	11	5498578	Ability to send dual CFA information on an LSR for HDSL orders	WorldCom	IMA Common	HDSL	Small	201	750
	12	SCR010902-1	Limited IMA GUI Access for Pre-Order Transactions Only	McLeodUSA	IMA GUI	All	Medium	751	3000
	13	SCR012202-1	Incorrect Consolidation of DR5 USOC in IMA	Qwest	IMA Common	ISDN PRI	Medium	751	3000
	14	SCR013002-3	IMA Pre-Order - Use CCNA to retrieve a Design Layout Report (DLR)	Qwest	IMA Common		Medium	751	3000
	15	SCR013002-4	Revision of TOS field in IMA	Qwest	IMA GUI	UNE-P, Resale	Medium	751	3000
	16	SCR013002-5	PIC Freeze Documentation	Qwest	IMA Common	Resale, UNE	Medium	751	3000

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

APPENDIX C: SAMPLE - IMA 11.0 INITIAL PRIORITIZATION LIST

RANK	TOTAL POINT VALUE	CR Number	Title	Company	Interface	Products Impacted	Shirt Size	Est LOE Min	Est LOE Max	Original List #
1	251	SCR013102-15	LSOG 6 - Upgrade Field Numbering and Naming to Existing Qwest Forms & EDI Maps **(FOUNDATION CANDIDATE) (NOTE: Per February CMP Meeting Discussion, this CR should be ranked higher than all other LSOG 6 Change Requests)**	Qwest	IMA Common	All Products	Extra Large	5501	8000	32
2	231	SCR013002-8	Flowthrough on Sup 2 Category Due Date	Qwest	IMA Common	All Products except Designed Products	Large	3001	5500	17
3	227	SCR101901-1	Allow customers to move and change local service providers at the same time. **(NOTE: Per February CMP Meeting Discussion, this CR should be ranked higher than #26)**	Eschelon	IMA Common	Centrex Resale, UNE-P	Extra Large	5500	8000	35
4	214	31766	Reject Duplicate LSRs	Qwest	IMA Common	All Products	Medium	751	3000	6
5	211	SCR013002-3	IMA Pre-Order - Use CCNA to retrieve a Design Layout Report (DLR)	Qwest	IMA Common		Medium	751	3000	14

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

APPENDIX D: SAMPLE CHANGE REQUEST FORM – AS OF 03/03/05

CHANGE REQUEST FORM

CR # _____ **Status:** _____

Originated By: Date Submitted: _____

Company: _____ Internal Ref# _____

Originator: _____, _____, _____/_____

Name, Title, and email/phone#

Area of Change Request: Please click appropriate box(es) and fill out the section(s) below.

☐ Product/Process ☐ System

Exception Process Requested: Please click appropriate boxes

☐ Yes ☐ No

(Exception Process Requests will be considered at the next monthly CMP meeting unless Exception call/meeting requested)

☐ Exception call/meeting requested

☐ Qwest SME(s) requested at Pre-Meeting (list if required) _____, _____, _____

Available Dates/Time for Clarification/Exception Pre-Meeting
1.
2.
3.
4.
5.

Regulatory or Industry Guideline CR: Please click appropriate box if you would like the CR to be considered as a Regulatory or Industry Guideline change.

☐ Regulatory ☐ Industry Guideline; Indicate industry forum: _____

Title of Change:

Description of Change/Exception:

Expected Deliverables/Proposed Implementation Date (if applicable):

OPTIONAL – COMPLETE THE SECTIONS BELOW WHERE APPLICABLE

Products Impacted: Please Click all appropriate boxes & also list specific products within product group, if applicable.

- ☐ Ancillary _____
  - ☐ LIDB _____
  - ☐ 8XX _____
  - ☐ 911 _____
  - ☐ Calling Name _____
  - ☐ SS7 _____
- ☐ AIN _____
- ☐ DA _____
- ☐ Operation Services _____
- ☐ INP _____
- ☐ Centrex _____
- ☐ Collocation _____
  - ☐ Physical _____
  - ☐ Virtual _____
  - ☐ Adjacent _____
  - ☐ ICDF Collocation _____
  - ☐ Other _____
- ☐ Enterprise Data Source _____
- ☐ Other _____
- ☐ Local Switching _____
- ☐ LNP _____
- ☐ Private Line _____
- ☐ Resale _____
- ☐ Switched Service _____
- ☐ UDIT _____
- ☐ Unbundled Loop _____
- ☐ UNE _____
  - ☐ Switching _____
  - ☐ Transport (Include EUDIT) _____
  - ☐ Loop _____
  - ☐ UNE-P _____
  - ☐ EEL (UNE-C) _____
  - ☐ Other _____
- ☐ Wireless _____
- ☐ LIS / Interconnect _____
  - ☐ EICT _____
  - ☐ Tandem Trans. / TST _____
  - ☐ DTT / Dedicated Transport _____
  - ☐ Tandem Switching _____

Area Impacted: Please click appropriate box.

- ☐ Pre-Ordering
- ☐ Provisioning
- ☐ Ordering
- ☐ Billing
- ☐ Maintenance / Repair
- ☐ Other _____

Form/Transaction/Process Impacted (IMA only): Please click all appropriate boxes.

Order

☐ LSR	☐ End User (EU)	☐ Resale (RS)	☐ Resale Split (RSS)
☐ Centrex (CRS)	☐ Resale Pvt. Line (RPL)	☐ Hunt Group (HGI)	☐ Loop Service (LS)
☐ Centrex Split (CRSS)	☐ Port Service (PS)	☐ Number Port (NP)	☐ Loop Service w/NP (LSNP)
☐ Frame Relay (RFR)	☐ DID Resale (DRS)		☐ Directory Listings (DL)
☐ Other _____			

LSR Activity

☐ N - New	☐ C - Change	☐ D - Disconnect	☐ T – Outside Move
☐ M – Inside Move	☐ Y - Deny	☐ L – Seasonal Suspend	☐ W – Conversion As Is
☐ B – Restore	☐ R - Record	☐ Z – Conv as Spec/No DL	☐ V – Conversion As Spec
☐ Other _____			

Pre-Order

☐ Address Validation	☐ CSR	☐ TN Reservation	☐ Loop Qual
☐ Facility Avail.	☐ Service Avail.	☐ CFA Validation	☐ Appointment Scheduler
☐ Raw Loop Data	☐ DLR	☐ Meet Point	☐ Listing Reconciliation
☐ Cancel	☐ Other _____		

Post-Order

☐ Local Response	☐ Completion	☐ PSON	☐ Billing Completion
☐ Status Updates.	☐ Status Inquiry	☐ LSR Notice Inquiry	☐ LSR Status Inquiry
☐ DSRED	☐ Batch Hot Cut	☐ Provider Notification	☐ Other _____

OSS Interfaces Impacted: Please click all appropriate boxes.

☐ CEMR	☐ IMA EDI	☐ MEDIACC	☐ QORA
☐ EXACT	☐ IMA GUI	☐ Product Database	☐ Wholesale Billing Interface
☐ Directory Listing	☐ HEET	☐ SATE	☐ Other _____

Change Request Form Instructions

The Change Request (CR) Form is the written documentation for submitting a CR for a Product, Process or OSS interface (Systems) change. The CR should be reviewed and submitted by the individual, which was selected to act as a single point of contact for the management of CRs to Qwest. Electronic version of the CR Form can be downloaded from the Qwest Wholesale WEB Page at http://www.qwest.com/wholesale/cmp/changerequest.html.

Product/Process and System CRs may be submitted to Qwest via e-mail at: cmpcr@qwest.com

To input data to the form, use the Tab Key to navigate between each field. The following fields on the CR Form must be completed as a minimum, unless noted otherwise:

Submitted By

- Enter the date the CR is being submitted to the Qwest CMP Manager.
- Enter Company's name and Submitter's name, title, and email/Phone #.
- Optional – identify potential available dates Submitter is available for a Clarification Meeting.
- Optional – enter a Company Internal Reference No. to be identified.

Area of Change Request

- Select the type of CR that is being submitted (Product, Process, or Systems).

Exception Process Requested

- Originator should indicate if they wish to have the request handled on an exception basis.
- Exception requests will be considered at the next monthly CMP meeting, unless the Originator requests an emergency call/meeting.
- Optional - Select Emergency call/meeting requested, if an emergency call/meeting is required.
- Optional - Originator may request a pre-meeting with Qwest by selecting the Pre-meeting with Qwest requested box.
- Optional - Originator may identify certain Qwest SME(s) to attend the Pre-meeting by selecting the Qwest SME(s) requested at Pre-Meeting box and listing the SME(s).

Regulatory or Industry Guideline CR

- Select either Regulatory or Industry Guideline if you would like the CR to be considered as a Regulatory or Industry Guideline change

Title of Change

- Enter a title for this CR. This should concisely describe the CR.

Description of Change/Exception

- Describe the Functional needs of the change being requested. To the extent practical, please provide examples to support the functional need and the names of Qwest personnel with whom the originator has been working to resolve the request. Also include the business benefit of this request.
- If Exception Process requested, provide reason for seeking an exception.

Expected Deliverables/Proposed Implementation Date (if applicable)

- Enter the desired outcome required (e.g. revised process, clarification, improved communication, etc.) and the desired date for completion. The specific deliverables Qwest must produce in order to close the CR. The originator should provide as much detail as possible.

Products Impacted – Optional

- To the extent known, check the applicable products that are impacted by the CR.

Area Impacted – Optional

- To the extent known, check the applicable process areas that are impacted by the CR.

OSS Interfaces Impacted – Optional

- To the extent known, check the applicable systems that are impacted by the CR.

Qwest's CMP Manager will complete the remainder of the Form.

APPENDIX E: SPECIAL CHANGE REQUEST PROCESS (SCRP) REQUEST FORM

SAMPLE

Qwest Wholesale Change Management Process (CMP)

Special Change Request Process (SCRP) Form

In the event that a systems CMP CR is not ranked high enough in prioritization for inclusion in the next Release, or as otherwise provided in the Qwest Wholesale CMP, the CR originator may elect to invoke the CMP Special Change Request Process (SCRP) as described Section 10.3 of the Qwest Wholesale Change Management Document.

The SCRP may be requested up to five (5) calendar days after prioritization results are posted. However, the SCRP does not supercede the process defined in Section 5.0 of the Qwest Wholesale Change Management Process Document.

The information requested on this form is essential for Qwest to evaluate your invocation of the Special Change Request Process (SCRP). Specific timeframes for evaluating your request are identified in the Special Change Request section of the Qwest Wholesale Change Management Process Document.

Complete the application form in full, using additional pages as necessary, and then submit the form to cmpesc@qwest.com. All applicable sections must be completed before Qwest can begin processing your request.

Requested By Name: _____ Email Address: _____

Company Name: _____

Address: _____

_____

Primary Technical Contact

Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

Primary Billing Contact

Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

Date of Request:_____

Date Received: _____ *(Completed by Qwest CMP Manager)*

1. Provide Qwest Wholesale CMP CR number for which you are requesting the SCRP:

_____

2. Provide reason for invoking the SCRP.

_____

_____

3. Provide proposed release to include CR in or proposed implementation date.

_____

_____

4. Provide any additional information that you feel would assist Qwest in preparing the SCRP quote.

_____

_____

5. List contact information for any other companies joining in the SCRP.

Company Name: _____

Contact Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

Company Name: _____

Contact Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

6. List additional contacts, such as technical personnel, who may help us during the evaluation of this request.

Contact Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

Contact Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

Please submit this form to Qwest in the following manner:

Send an e-mail to the Qwest CMP SCRP mailbox (cmpesc@qwest.com). The subject line of the e-mail message must include:

- "SCRP FORM"

•CR number and title
•CR originator's company name

The text of the e-mail message must include:

- Description of the CR
- A completed SCRP Form
- A single point of contact for the SCRP request including:
  - Primary requestor's name and company
  - Phone number
  - E-mail address
- Circumstances which have necessitated the invocation of the SCRP
- Desired implementation date
- If more than one company is making the SCRP request, the names and point of contact information for the other requesting companies.

APPENDIX F: CLEC-QWEST VOTING TALLY FORM

Name of Call/Meeting:	
Date of Vote:	

Subject:	

Voting Carrier	Voting Participant (in person, by phone, or by email)	Vote		
		YES	NO	Abstain

Result:	

DEFINITION OF TERMS

Term	Definition
CLEC	A telecommunications provider that has authority to provide local exchange telecommunications service on or after February 8, 1996, unless such provider has been declared an Incumbent Local Exchange Carrier under the Federal Telecommunications Act of 1996.
Design, Development, Notification, Testing, Implementation and Disposition	Design: To plan out in a systematic way. Design at Qwest includes the Business Requirements Document and the Systems Requirements Document. These two documents are created to define the requirements of a Change Request (CR) in greater detail such that programmers can write system software to implement the CR. Development: The process of writing code to create changes to a computer system or sub system software that have been documented in the Business Requirements and Systems Requirements. Notification: The act or an instance of providing information. Various specific notifications are documented throughout this CMP. Notifications apply to both Systems and Product & Process changes Testing: The process of verifying that the capabilities of a new software Release were developed in accordance with the Technical Specifications and performs as expected. Testing would apply to both Qwest internal testing and joint Qwest/CLEC testing. Implementation: The execution of the steps and processes necessary in order to make a new Release of a computer system available in a particular environment. These environments are usually testing environments or production environments. Disposition: A final settlement as to the treatment of a particular Change Request.
Good Faith	"Good faith" means honesty in fact and the observance of reasonable commercial standards of fair dealing.
History Log	A History Log documents the changes to a specific document. The log will contain the document name and, for each change, the document version number, change effective date, description of change, affected section name and number, reason for change, and any related CR or notification number.
Level of Effort	Estimated range of hours required to implement a Change

Term	Definition
	Request
OSS Interface	Existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users.
OSS Interface Application to Application Testing • Controlled Production Testing • Initial Implementation Testing • Migration Testing • Regression Testing	Controlled Production Testing: Controlled Production process is designed to validate CLEC ability to transmit transactions that meet industry standards and comply with Qwest business rules. Controlled Production consists of submitting requests to the Qwest production environment for provisioning as production orders with limited volumes. Qwest and CLEC use Controlled Production results to determine operational readiness for full production turn-up. Initial Implementation Testing: This type of application-to-application testing allows a CLEC to validate its technical development of an OSS Interface before turn-up in production of new transactions or significantly changed capabilities. Migration Testing: Process to test in the Customer Testing Environment a subsequent application-to-application Release from a previous Release. This type of testing allows a CLEC to move from one Release to a subsequent Release of a specific OSS Interface. Regression Testing: Process to test, in the Customer Test Environment, OSS Interfaces, business process or other related interactions. Regression Testing is primarily for use with 'no intent' toward meeting any Qwest entry or exit criteria within an implementation process. Regression Testing includes testing transactions previously tested, or certified.
Release • Major Release • Point Release • Patch Release	A Release is an implementation of changes resulting from a CR or production support issue for a particular OSS Interface There are three types of Releases for IMA.: • Major Release may be CLEC impacting (to systems code and CLEC operating procedures) via EDI changes, GUI changes, technical changes, or all. Major Releases are the primary vehicle for implementing systems Change Requests of all types (Regulatory, Industry Guideline, CLEC originated and Qwest originated). • Point Release may not be CLEC code impacting, but may affect CLEC operating procedures. The Point Release is used to fix bugs introduced in previous Releases, apply technical changes, make changes to the GUI, and/or deliver

Term	Definition
	enhancements to IMA disclosed in a Major Release that could not be delivered in the timeframe of the Major Release. • Patch Release is a specially scheduled system change for the purpose of installing the software required to resolve an issue associated with a trouble ticket.
Release Notification	A notification distributed by Qwest through the Mailout tool to provide the information required by the following sections of this CMP: 7.0 - Introduction of a New OSS Interface, 8.0 - Change to Existing OSS Interfaces and 9.0 - Retirement of Existing OSS Interfaces.
Release Production Date	The Release Production Date is the date that a software Release is first available to the CLECs for issuance of production transactions.
Software Defects	A problem with system software that is not working according to the Technical Specifications and is causing detrimental impacts to the users.
Stand-alone Testing Environment (SATE)	A Stand-Alone Testing Environment is a test environment that can be used by CLECs for Initial Implementation Testing, Migration Testing and Regression Testing. SATE takes CLEC pre-order and order transaction requests, passes the requests to the stand-alone database, and returns responses to the CLEC user. SATE uses pre-defined test account data and requests that are subject to the same BPL IMA/EDI edits as those used in production. The SATE is intended to mirror the production environment (including simulation of all legacy systems). SATE is part of the Customer Test Environment.
Sub-systems	A collection of tightly coupled software modules that is responsible for performing one or more specific functions in an OSS Interface.
Subject Matter Expert (SME)	An individual responsible for products, processes or systems identified or potentially affected by the CLEC or Qwest request. When attending a CMP meeting, a SME will either answer specific questions about the request or take action items to answer promptly specific questions.
Technical Specifications	Detailed documentation that contains all of the information that a CLEC will need in order to build a particular Release of an application-to-application OSS Interface. Technical Specifications include: • A chapter for each transaction or product which includes a business (OBF forms to use) description, a business model (electronic transactions needed to complete a business function), trading partner access information, mapping

Term	Definition
	examples, data dictionary Technical Specification Appendices for IMA include: • Developer Worksheets • IMA Additional Edits (edits from backend OSS Interfaces) • Developer Worksheets Change Summary (field by field, Release by Release changes) • EDI Mapping and Code Conversion Changes (Release by Release changes) • Facility Based Directory Listings • Generic Order Flow Business Model The above list may vary for non-IMA application to application interfaces
Version	A version is the same as an OSS Interface Release (Major or Point Release)

Arizona Corporation Commission
Docket No. T-03406A-06-0257
Docket No. T-01051B-06-0257
Qwest Corporation – Confidential JM-3
Exhibits of Jill Martain

EXHIBIT JM-3

REDACTED

Arizona Corporation Commission
Docket No. T-03406A-06-0257
Docket No. T-01051B-06-0257
Qwest Corporation – JM-4
Exhibits of Jill Martain

EXHIBIT JM-4

EXHIBIT JM-2

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Arizona Corporation Commission
Docket No. T-03406A-06-0257
Docket No. T-01051B-06-0257
Qwest Corporation – JM-5
Exhibits of Jill Martain

EXHIBIT JM-5

Expedites and Escalations Overview – V41.0

History Log (Link italicized text to: Replace Existing Download With Attached History Log)

Introduction

Qwest quickly responds to your escalation or expedite requests offering you clear and complete explanations so you can satisfactorily respond to your end-users.

- Expedites are requests for an improved standard interval that is shorter than the interval defined in our Service Interval Guide (SIG) (Link italicized text to: http://www.qwest.com/wholesale/guides/sig/index.html) or your interconnection Agreement (ICA), Individual Case Basis (ICB) or committed to ICB (Ready for Service (RFS) + Interval) date.
- Escalations can be initiated for any issue, at anytime, and at any escalation point. Escalations can also be for requests for status or intervention around a missed date.

The following summarizes the processes used within Qwest for all Wholesale Products and Services to handle expedite and escalation requests.

Expedites

Requesting an expedite follows one of two processes, depending on the product being requested. If the request being expedited is for a product contained in the "Pre-Approved Expedites" section below, your ICA must contain language supporting expedited requests with a "per day" expedite rate. If the request being expedited is for a product that is not on the defined list, then the expedited request follows the process defined in the "Expedites Requiring Approval" section below.

Expedites Requiring Approval

For products not listed in the Pre-Approved Expedite section below, (non-designed products such as POTS, Centrex or DSL service) the following expedite process applies. Expedite charges are not applicable with the Expedites Requiring Approval process.

Following is a list of conditions where an expedite is granted:

- Fire
- Flood
- Medical emergency
- National emergency
- Conditions where your end-user is completely out of service (primary line)
- Disconnect in error by Qwest
- Requested service necessary for your end-user's grand opening event delayed for facilities or equipment reasons with a future RFS date
- Delayed orders with a future RFS date that meet any of the above described conditions
- National Security
- Business Classes of Service unable to dial 911 due to previous order activity
- Business Classes of Service where hunting, call forwarding or voice mail features are not working correctly due to previous order activity where the end-users business is being critically affected

For any of the above conditions, expedited request can be made either prior to, or after, submitting your service request.

To request an expedite on a Local Service Request (LSR) you can either:

- Submit the request with your expedited due date and populate the EXP field. Also include in REMARKS the reason for the expedited request and then call the Qwest Call Center.
- Submit the request with a due date interval from our SIG (Link italicized text to: http://www.qwest.com/wholesale/guides/sig/index.html) or your ICA and then call the Qwest Call Center.

In both scenarios, a call to the Qwest Call Center is required on 1-866-434-2555 to process the expedited request.

To request an expedite on service requests issued via an Access Service Request (ASR), you may use either of the options described above for LSRs to submit the ASR. You should then call 1 800-244-1271

You may be asked to provide verification of the expedited reason or situation for any of the expedite reasons listed above. In some cases, you may be asked for the service order number that caused the expedite condition, such as the service order number that caused the hunting or call forwarding expedite. The type of verification required will depend on the specific circumstances of the expedite and will be determined on an Individual Case Basis (ICB).

Once your expedite request is received, your Wholesale representative will review the request based on the previous list of available expedite scenarios to determine if the request is eligible for an expedite. If approved, the next step is to contact our Network organization to determine resource availability.

Depending on the type of service on the account, the following action is taken once the request is determined to be eligible for an expedited due date:

Non-Designed/No Dispatch Required
For requests that do not require a dispatch, the order is issued with the expedited due date.

Non-Designed/Dispatch Required
For requests that require a dispatch, the Network organization is contacted to determine Technician availability. If appointments are available on the requested due date, your expedite is granted. If no appointments are available, then Qwest will offer an alternative date, if one is available, prior to the requested due date. You can expect to receive a response to your expedited request usually within four business hours.

Designed Services
For Designed Services, the Network organization is contacted to determine resource availability for the Central Office and Outside Technicians as well as for the Testers that work with you to accept the service. You can expect to receive a response usually within four business hours.

Approved Expedited Requests

If the expedited request is approved and the original request contained the expedited due date and the EXP field was populated, Qwest will return a Firm Order Confirmation (FOC) acknowledging the agreed to expedited due date. If the expedited or agreed to due date is different from what was originally submitted on the ASR or LSR, Qwest will contact you and request that you supplement your request with the agreed to expedited date. The EXP field on the supplement ASR or LSR must also be populated. If the supplement is not received within four business hours, Qwest will continue to process the ASR or LSR as if the expedited request was not received and will FOC back the standard interval or the original due date provided on the ASR or LSR if it was longer than the standard interval.

Denied Expedited Requests

If denied, then we will provide you reasons that the request was denied or we will offer an alternative date that we could install the service. If the request is denied, and you still want to continue to have Qwest provision the service request, Qwest will return a FOC with the standard interval or the original due date provided on the FOC if it was longer than the standard interval.

Pre-Approved Expedites

The Pre-Approved expedite process is available in all states except Washington for the products listed below when your ICA contains language for expedites with an associated per day expedite charge.

Note: Resold Designed products are automatically included based on the terms and conditions outlined in the ICA and individual state tariffs, catalogs or price lists.

For products other than the Resold Design products identified below, if your contract does not contain the appropriate expedite language, you will not be able to expedite the request unless the expedite is due to a Qwest caused reason.

The Expedites Requiring Approval section of this procedure does not apply to any of the products listed below (unless you are ordering services in the state of WA).

An expedite charge applies per ASR or LSR for every day that the due date interval is improved, based on the standard interval in the SIG, ICA, or ICB criteria as described above. It is not necessary for you to call into Qwest to have the expedite approved. To expedite a service request on an ASR or LSR you must populate the EXP field and put the desired expedited due date in the DDD field on the ASR or LSR.

Note: If the ASR/LSR you are submitting requests a same day due date, your request must be received before 12 noon MT.

When Qwest receives an ASR or LSR with the EXP populated and the DDD is less than the standard interval, Qwest will determine if the request is eligible for an expedite without a call from you. If the request meets the criteria for the Pre-Approved Expedite process, Qwest will process the request and return a FOC acknowledging the expedited due date. The appropriate expedite charge will be added to your service order.

If the request does not meet the criteria for the Pre-Approved Expedite process, the ASR or LSR will be processed using the standard interval that is defined in the *Standard Interval Guide for Resale, UNE and Interconnection Services* (Link italicized text to: http://www.qwest.com/wholesale/guides/sig/index.html).
Following is a list of the products, which require expedite language in the ICA and may be expedited that will receive the appropriate Expedite Charge:

- UBL
- UBL DID (Unbundled digital trunk)
- UBL DS1 (Unbundled digital trunk facility)
- UNE-C PL (EEL)
- UNE-P ISDN BRI
- UNE-P DSS Facility
- UNE-P DSS Trunk
- UNE-P PRI ISDN Facility

- UNE-P PRI ISDN Trunk
- UNE-P PBX Designed Trunks
- UNE-P PBX DID IN-Only Trunks
- UDIT
- LIS
- CCSAC SS7 Trunk or Facility
- Unbundled Dark Fiber

Following is a list of Resold Designed Products, which do not require an amendment, which may be expedited and will receive the appropriate expedite charge:

- Analog PBX DID
- Private Line (DS0, DS1, DS3 or above)
- ISDN PRI T1
- ISDN PRI Trunk
- ISDN BRI Trunk
- Frame Relay Trunk
- DESIGNED TRUNKS (Includes designed PBX trunks) Trunk
- MDS / MDSI (*IIS Only*)
- DPAs (multiple DPAs or FX, FCO) Trunk

Note: Any requests that are expedited due to a Qwest caused reason, do not incur an expedite charge. Additionally, if the due date of an expedited request is missed due to Qwest reasons, expedite charges do not apply.

If the order becomes a Delayed Order on the due date, Qwest will cooperatively work with you to obtain the best Ready For Service date (RFS) possible and expedite charges do not apply.

If an order becomes delayed for facilities prior to the due date, once Qwest establishes a new RFS it is communicated to you via the FOC. If you do not accept the due date that is established and request to expedite the RFS, expedite charges may apply. Each expedited delayed order request will be reviewed on an ICB to determine if expedite charges apply. If the expedited due date request results in Qwest incurring additional costs to improve the date that was FOC'd, expedite charges apply. Qwest will advise you if expedite charges apply prior to confirming the expedited request to obtain approval from you, or offer an alternate date that Qwest can meet. The expedite charges will be based on the number of days improved from the original RFS date.

If an order was delayed due to a Customer Not Ready (CNR) condition as described in the Provisioning and Installation Overview (Link italicized text to: http://www.qwest.com/wholesale/clecs/provisioning.html); and you wish to expedite the newly requested due date, supplement the request with the new Desired Due Date and populate the EXP field of the LSR/ASR. Qwest will review your expedited request for resource availability. In some cases, we may contact you to advise resources for expedite are not available or offer an alternate date. Expedite charges apply and are based on the number of days the CNR standard interval is improved.

Expedites Supporting Non-Qwest caused Restoral Requests

This process includes Restoral Requests on Resale/UNE-P/Retail to Resale or UNE-P Conversions and Transfer of Service when the service orders have completed. This process applies to Resale/UNE-P POTS, Resale/UNE-S and Resale UNE-P Centrex 21 products, including DSL.

You will follow this documented **Expedite** process as outlined when you require an expedite to a standard interval in order to restore an end-user due to a Non-Qwest caused out of service

condition. An expedite restoral request is a result of your inability to complete a conversion or outside move service request where you were unable to cancel or change the due date on the service order(s) prior to order completion. Restoral requests may involve you alone, a Qwest Retail account and you, or you and a different CLEC on conversion and outside move (T & F) type service order's. Restoral requests will be accepted for both full and partial restorals.

When an expedite restoral request situation occurs, refer to the following when you prepare your service request:

- Issue the Restoral Request LSR as directed per the Decision Charts and order type scenario's.
  - Populate the RPON field with the PON used on the original LSR if available
  - Populate the EXP field
  - Populate Manual IND = Y
  - The REMARKS field can be populated with the specific reason for the request such as:
    - Restoral request Full, Resale to UNE-P conv, restore original service, Or
    - Restoral request, Partial, Resale to UNE-P conv, restore original service, Or
    - Restoral request, Partial, UNE-P to Resale conv, restore original service, Or
    - Restoral request, Full, Resale or UNE-P T&F, restore F location, etc., Or
    - Restoral Request, Restore original full service back to CLEC XXXX, Or
    - Restoral Request, Restore original partial service back to CLEC XXXX, Or
    - Restoral Request, Restore original F Loc service, full/partial back to old CLEC
    - Restoral Request, Disc service, restore original Retail service, full/partial
- Contact the Customer Service Inquiry and Education (CSIE) Center at 866-434-2555
- Open an Escalation ticket.
-
- Request a Restoral Request for Previous Service.
- Provide LSR ID if appropriate per Decision Chart and order type scenario's.

Benefits

- Expedited intervals for restoral of previous service
- Uniform documented process for restoral requests
- Qwest will negate the one month minimum billing on a disconnect or conversion service order as applicable.

Restrictions

- You must issue appropriate LSRs first (if directed to do so per the Decision Chart below) followed by opening a Call Center escalation ticket. Restoral requests received prior to new LSR issuance will not be accepted, excludes Qwest Retail restorals.
- Standard intervals must be used when submitting LSRs, CSIE will expedite due date appropriately for restoral
- Expedited restoral requests must be requested within 24 hours, extending into the next business day, following the LSR completion date. Restoral requests received after 3 PM will be considered next business day work activity; this includes restoral requests received after 3 PM on Saturday based on the SIG (except for DSL)."
- Service being restored must be the same type of service with same features, same TN's, etc. as was previously provisioned. Full or partial restorals are acceptable.
- Qwest will reuse facilities when the facilities are available for the restoral.
- All applicable recurring and non-recurring charges will apply, based on order completion and physical work that was completed or needs to be completed to restore service. Retail practices will apply when restoring Qwest Retail accounts.
- When a restoral involves two CLECs, it is up to you and the old CLEC to coordinate and agree upon an expedite, prior to opening up the Call Center Escalation ticket(s).
- Expedite charges may apply based upon individual interconnection agreements, state tariffs or SGATS.

The following **Order Type Scenario's** are included in this restoral process:

1. Resale / UNE-P T & F, same CLEC
2. Resale to UNE-P Conversion as is, same CLEC
3. Resale to UNE-P Conversion as specified, same CLEC
4. UNE-P to Resale Conversion as is, same CLEC
5. UNE-P to Resale Conversion as specified, same CLEC
6. Resale / UNE-P Migration to new CLEC with move via single LSR
7. Resale to UNE-P Conversion as is, to a new CLEC
8. Resale to UNE-P Conversion as specified, to a new CLEC
9. UNE-P to Resale Conversion as is, to a new CLEC
10. UNE-P to Resale Conversion as is, to a new CLEC
11. Qwest Retail to Resale / UNE-P Conversion as is
12. Qwest Retail to Resale / UNE-P Conversion as specified
13. Qwest Retail to Resale / UNE-P Conversion with move via single LSR process

Decision Chart, Scenario's 1-5, Same CLEC		
IF	**AND**	**THEN**
Conversion, Migration and/or Move Service Order has completed	You want full or partial restoral of previous service	• Issue Restoral Request LSR as appropriate based on order scenario and order completion, such as a New Connect, Change or Conversion with or without move, Transfer of Service or Disconnect • Follow expedite procedures

Decision Chart, Scenario's 6-10, To a New CLEC		
IF	**AND**	**THEN**
Conversion, Migration and/or Move Service Order has completed	You want full or partial restoral of previous service	• Either the end-user, or the new CLEC and the end-user must contact the old CLEC's Customer Contact Center and request that the end-user's service be re-established as previously provisioned for the old CLEC on Resale or UNE-P service • Old CLEC must follow expedite procedures • Old CLEC will issue Restoral Request LSR as appropriate based on order scenario and order completion, such as a New Connect, Change or Conversion with or without move • New CLEC must follow expedite procedures • New CLEC will issue Disconnect LSR if required

		based on order scenario and order completion • Old and new CLECs will coordinate their order activity • Contact your Qwest Service Manager if you require assistance with old CLEC contact

Decision Chart, Scenario's 11-13, Conversion from Qwest Retail to New CLEC		
IF	**AND**	**THEN**
Conversion, Migration and/or Move Service Order has Completed	You want full or partial restoral of previous service	• Contact the CSIE Center at 866-434-2555 • Open an Escalation ticket • Request a warm transfer to the CSIE Tier 1 support group • Place a verbal Restoral Request for Previous Retail Service, full or partial restoral • CSIE will advise you if a new LSR will need to be issued by you • If a new LSR is needed and is not issued within 2 business hours, the escalation ticket will be closed. If this occurs, the CLEC must start the expedite process again once the LSR has been issued as directed.

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Escalations

Escalations are a request for status or intervention around a missed critical date such as:

- Plant Test Date (PTD)
- Due Date (DD)
- Ready For Service (RFS)

Qwest's Service Centers pro-actively escalate any critical dates in jeopardy and will notify you. If, however, you find it necessary to initiate an escalation, call the assigned Qwest Wholesale Center Representative at one of the numbers listed in the Expedites section for assistance. Regardless of how initiated, by you or internally, Qwest escalation roles and responsibilities can be summarized as:

- Qwest Wholesale Center Representatives
  Local Service Request (LSR) or Access Service Request (ASR) escalations related to Rejects/Delayed orders, critical dates and Firm Order Confirmations (FOC).
- Qwest Service Manager

Involved only after normal processes fail to resolve the escalation to your satisfaction. Evaluates the situation based on commitments managing associated resolution activities.

- Qwest Senior Service Manager/Director
  Involved only when the Service Manager's efforts are unsuccessful. Provides direction to those working the issue, partnering with Center Coaches and Team leaders.
- Qwest Senior Service Director/Vice President
  Contacted for direction and/or assistance for those working the escalation, providing timely status updates back to the prior level and you directly.

Escalations – Maintenance and Repair

At your discretion, you may initiate an escalation of your trouble report through our electronic interface Customer Electronic Maintenance and Repair (CEMR) or by calling either the Wholesale Repair for Unbundled Network Elements (UNEs) and Complex services or the Repair Call Handling Center (RCHC) for Plain Old Telephone Service (POTS) and Non-Complex services. Refer to our Maintenance and Repair Overview (Link italicized text to: http://www.qwest.com/wholesale/clecs/maintenance.html) for additional information. You will be referred to Held, Escalated & Expedited Tool (HEET) (Link italicized text to: http://www.qwest.com/wholesale/systems/heet.html) for ongoing status if your service was requested on an ASR.

Escalations – Technical Escalation Process

Additional information about the Technical Escalation Process can be obtained from Qwest's Operations Support Systems General Information. (Link italicized text to: http://www.qwest.com/wholesale/systems/generalinfo.html)
Note: Occasionally, your end-user may find their way to the Qwest Wholesale Center or Qwest Service Manager and our Wholesale Center Representatives will explain that you are our customer and direct them to you for assistance.

Should you have questions, or need additional information related to the expedite or escalation processes defined above, contact your Qwest Service Manager (Link italicized text to: http://www.qwest.com/wholesale/clecs/accountmanagers.html) for assistance.

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Training

Local Qwest 101 "Doing Business With Qwest"

This introductory Web-based training is designed to teach the Local CLEC and Local Reseller how to do business with Qwest. It will provide a general overview of products and services, Qwest billing and support systems, processes for submitting service requests, reports, and web resource access information. Click here to learn more about this course and to register. (Link italicized text to: http://www.qwest.com/wholesale/training/wbt_desc_lq101.html)

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Contacts

Qwest contact information is located in Wholesale Customer Contacts. (List italicized text to: http://www.qwest.com/wholesale/clecs/escalations.html)
Expedites and Escalations

- Local Service Requests (LSRs)

Wholesale Center			
Tier	**Responsibility**	**Activity**	**Contacts**
Tier 1	Customer Service Inquiry and Education Center (CSIE)	First point of contact for CLECs	866-434-2555
Tier 2	Subject Matter Expert (SME), Team Leaders, Team Coaches	Respond to issues not resolved at Tier 1	800-366-9974
Tier 3	Appropriate Qwest Service Manager	Respond to issues not resolved at Tier 2	Service Manager (Link italicized text to: http://www.qwest.com /wholesale/clecs/acco untmanagers.html)

A call center ticket is opened on every call into the CSIE Center. Upon resolution of the ticket a close code is assigned to the ticket. Upon request the close code is provided to you. Should you disagree with the codes used to close the ticket you will use the escalation process.
For a list of the close codes used at the CSIE level see the Call Center Database Ticket Reports section of the Ordering Overview PCAT(Link italicized text to: http://www.qwest.com/wholesale/clecs/ordering.html).

- Access Service Requests (ASRs)

	Products & Services	Contacts	Fax
	All	800-244-1271	800-335-5680

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Frequently Asked Questions

This section is currently being compiled based on your feedback.

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Last Update: July 24, 2006

META Tags: Expedites; Escalations

Arizona Corporation Commission
Docket No. T-03406A-06-0257
Docket No. T-01051B-06-0257
Qwest Corporation – JM-6
Exhibits of Jill Martain

EXHIBIT JM-6

EXHIBIT JM-4

4. ORDER MODIFICATIONS AND MISCELLANEOUS CHARGES

4.1 GENERAL (CONT'D)

4.1.4 EXPEDITE

A. If a customer desires that service be provided on an earlier date than that which has been established for the order, the customer may request that service be provided on an expedited basis. If the Company agrees to provide the service on an expedited basis, an Expedite Charge will apply. The customer will be notified of the Expedite Charge prior to the order being issued.

B. If the Company is subsequently unable to meet an agreed upon expedited service date, no Expedite Charge will apply unless the missed service date was caused by the customer.

C. The Expedited Order Charge will be applied when the customer requests a service date that is prior to the standard interval service date as set for in the Qwest Corporation Service Interval Guide (SIG) on an order or when a customer requests an earlier service date on a pending standard or negotiated interval order.

The Expedited Order Charge, as set forth below, will apply on a per order basis for each day the service date is advanced.

	USOC	NONRECURRING CHARGE
• Per day advanced	EODDB	$200.00

The Expedited Order Charges will be billed in addition to other applicable nonrecurring charges.

Arizona Corporation Commission
Docket No. T-03406A-06-0257
Docket No. T-01051B-06-0257
Qwest Corporation – JM-7
Exhibits of Jill Martain

EXHIBIT JM-7

EXHIBIT JM-5

5. ORDERING OPTIONS FOR ACCESS SERVICES

5.2 ACCESS ORDER
5.2.2 ACCESS ORDER MODIFICATIONS (CONT'D)

D. Expedited Order Charge

When placing an Access order for service(s) for which standard intervals exist, a customer may request a service date that is prior to the standard interval service date. A customer may also request an earlier service date on a pending standard or negotiated interval Access Order. If the Company agrees to provide the service on an expedited basis, an Expedited Order Charge will apply.

A customer may request a change of end user premises within the same serving wire center. When this occurs, the service date is changed to reflect the standard interval. If the customer requests an earlier service date, an Expedited Order Charge will apply.

Expedited Order Charges will not apply if the revised interval to a pending order is equal to or longer than the standard interval for that service.

Expedited Order Charges will not apply to part-time audio or part-time video. (C)

When an expedited service date is missed, the Expedited Order Charge will apply unless the missed service date is caused by the Company.

5. ORDERING OPTIONS FOR ACCESS SERVICES

5.2 ACCESS ORDER
5.2.2 ACCESS ORDER MODIFICATIONS
D. Expedited Order Charge (Cont'd)

The Expedited Order Charge will apply to all products and services found in this tariff unless otherwise specified. This charge will be applied when the customer requests a service date that is prior to the standard interval service date on an Access Order or when a customer requests an earlier service date on a pending standard or negotiated interval Access Order. (C)

The Company will provide the customer with an estimate of the Expedited Order Charge before expediting an order.

The Expedited Order Charge, as set forth below, will apply on a per order basis for each day the service date is advanced. (N)

	USOC	NONRECURRING CHARGE
• Per day advanced	EODDB	$200.00
• Per day advanced[1] for Pricing Flexibility	EODDA	200.00

The Expedited Order Charges will be billed in addition to other applicable nonrecurring charges. (N)

[1] This rate applies to Expedited Orders located in Phase I and Phase II MSAs, as defined in Section 23, following. (C)

5. ORDERING OPTIONS FOR ACCESS SERVICES

5.2 ACCESS ORDER
5.2.2 ACCESS ORDER MODIFICATIONS
D. Expedited Order Charge (Cont'd)

If costs other than additional labor are to be incurred when an Access Order is expedited, the Company will develop, determine and bill the customer such costs in accordance with the special construction terms and conditions as set forth in Tariff F.C.C. No. 2. Authorization to incur the cost and to bill the customer will be in accordance with the terms and conditions of Tariff F.C.C. No. 2.

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF ESCHELON TELECOM OF ARIZONA, INC.	)	
Complainant,	)	**DOCKET NO. T-03406A-06-0257**
vs	)	**T-01051B-06-0257**
QWEST CORPORATION	)	
Respondent.	)	**AFFIDAVIT OF JILL MARTAIN**
STATE OF UTAH	) :	**SS**
COUNTY OF SALT LAKE	)	

Jill Martain, of lawful age being first duly sworn, deposes and states:

1. My name is Jill Martain. I am the Manager of Process Management – Wholesale Markets for Qwest Services Corporation in Salt Lake City, Utah. I have caused to be filed written direct testimony in Docket Nos. T-03406A-06-0257 and T-01051B-06-0257.

2. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.

Jill Martain

Jill Martain

SUBSCRIBED AND SWORN to before me this 24th day of August, 2006.

Cherilyn Oliver

Notary Public

My Commission Expires: 7/14/09

NOTARY PUBLIC
CHERILYN OLIVER
7181 S. CAMPUS VIEW DR
WEST JORDAN, UTAH 84084
COMMISSION EXPIRES
July 14, 2009
STATE OF UTAH

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM A. MUNDELL
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner
BARRY WONG
Commissioner

IN THE MATTER OF THE COMPLAINT OF ESCHELON TELECOM OF ARIZONA, INC. AGAINST QWEST CORPORATION	)	DOCKET NO. T-03406A-06-0257 DOCKET NO. T-01051B-06-0257

DIRECT TESTIMONY

OF

RENÉE ALBERSHEIM

ON BEHALF OF

QWEST CORPORATION

AUGUST 28, 2006

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I IDENTIFICATION OF WITNESS

Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS ADDRESS.

A. My name is Renée Albersheim. I am employed by Qwest Services Corporation, parent company of Qwest Corporation ("Qwest"), as a Staff Witnessing Representative. I am testifying on behalf of Qwest. My business address is 1801 California Street, 24th floor, Denver, Colorado, 80202.

Q. PLEASE DESCRIBE YOUR EDUCATIONAL BACKGROUND AND EMPLOYMENT EXPERIENCE.

A. I have been working in Qwest's Global Wholesale Markets organization since December 2003. Before December 2003, I had worked in Qwest's Information Technologies Wholesale Systems organization since joining Qwest in October 1999. As a Staff Witnessing Representative, I provide support for Qwest's responses to regulatory issues associated with the 1996 Telecommunications Act, FCC orders, state commission decisions, and other legal and regulatory matters.

Prior to becoming a Qwest employee, I worked for 15 years as a consultant on many systems development projects and in a variety of roles, including the following: programmer and systems developer, systems architect, project manager, information center manager and software training consultant. I worked on projects in a number of different industries, including: oil and gas; electric, water and telephone utilities; insurance; fast food; computer hardware; and the military. I also designed and developed a number of applications, including electronic interfaces. During that time, I worked on several of Qwest's Operations Support Systems ("OSS") as a consultant on Human Resources and Interactive Access Billing Systems ("IABS") projects.

In addition to working full-time at Qwest, I also earned a Juris Doctor degree from the University of Denver College of Law and passed the Colorado Bar Examination in October 2001. Prior to attending law school, I received a Master of Business Administration in Management Information Systems from the University of Colorado College of Business and Administration in 1985 and a Bachelor of Arts degree from the University of Colorado in 1983.

Q. HAVE YOU TESTIFIED PREVIOUSLY IN ARIZONA?

A. Yes, I am currently a witness in the Wire Center Impairment Case (TRRO) Docket No. T-01051B-06-0091. I presented testimony in the interconnection agreement arbitration between Covad and Qwest, Docket No. T-03632A-04-0425, and I appeared in the Cost Docket Proceeding, Docket No. T-00000A-00-0194.

Q. HAVE YOU TESTIFIED BEFORE OTHER STATE REGULATORY COMMISSIONS?

A. Yes. As a witness for Qwest's Global Wholesale Markets organization, I have filed written testimony and appeared before the commissions in Colorado, Minnesota, New Mexico, Utah, Washington and Wyoming. In my job as a witness on matters dealing with Qwest's interconnection agreements and operations support systems, I have also submitted written testimony in Idaho, Iowa, North Dakota, Oregon, South Dakota, Montana, and Nebraska.

II PURPOSE OF TESTIMONY

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. The purpose of my testimony is to reply to portions of the testimony of Mr. James Webber of Eschelon. I will explain that Mr. Webber fails to differentiate the two expedite processes offered by Qwest that are premised on the long-standing

distinction between designed and non-designed products. I will show that Mr. Webber is incorrect in his assertion that Qwest discriminates against Eschelon in its offering of expedited orders. I will show that Eschelon's current interconnection agreement does not allow Eschelon to demand expedites for designed service orders at no charge. And finally I will show that Mr. Webber's criticisms of the CMP process are misplaced.

III DESIGNED VERSUS NON-DESIGNED SERVICES

Q. DID MR. WEBBER DISTINGUISH BETWEEN DESIGNED AND NON-DESIGNED SERVICES IN HIS TESTIMONY, AND WHY DOES THIS MATTER?

A. No, he did not. Mr. Webber makes several statements in his testimony regarding Eschelon's concern that there is a separate process for expedites of unbundled loops, and he claims that the expedite process for unbundled loops should be the same as that for retail and QPP services. He believes that Qwest makes the distinction based on the fact that there is no retail analog for unbundled loops.[1] Apparently he has not understood the true basis for the distinction. Qwest has established two expedite processes because Qwest has two types of services: designed services and non-designed services.

Q. WHAT IS A NON-DESIGNED SERVICE?

A. A non-designed service, also known as POTS ("Plain Old Telephone Service") is a very basic telephone service. Inventory for a non-designed service is provisioned out of Qwest's Loop Facility Assignment and Control System ("LFACS") database. A non-designed service is identified by a 13-digit code that is a combination of a 3-digit customer code and a 10-digit telephone number. Resale POTS is an example of a non-designed service.

[1] See *In the Matter of the Complaint of Eschelon of Arizona, Inc. Against Qwest Corporation*, Docket No. T-01051B-06-0257, Docket No. T-03406A-06-0257, Direct Testimony of James D. Webber on Behalf of Eschelon Telecom of Arizona, Inc., July 13, 2006 ("Webber Direct") at page 6.

Q. WHAT IS A DESIGNED SERVICE?

A. A designed service is a more complex service. Inventory for a designed service is provisioned out of both LFACS and the Trunk Inventory Record Keeping System ("TIRKS"). A designed service is identified by a circuit id. Provisioning intervals for designed services are generally longer than for non-designed services, as provisioning of designed services is more complex. An unbundled loop is an example of a designed service.

Q. DO QWEST'S PERFORMANCE MEASURES ACCOUNT FOR THE DIFFERENCE BETWEEN DESIGNED AND NON-DESIGNED SERVICES?

A. Yes. Qwest's provisioning Performance Indicator Definitions ("PIDs") consistently distinguish between designed and non-designed services. For example, unbundled loops, which are designed services, are measured separately from resale POTS services, which are non-designed. As I noted above, provisioning designed services is a more complex task. Qwest's provisioning PIDs demonstrate that designed services are expected to take longer to provision, and therefore have longer provisioning intervals. For example, OP-3 is the measure that determines the percentage of orders that Qwest must complete on time – "Commitments Met." For resale and UNE-P (now available commercially as QPP), Qwest must provision these services at parity with Qwest's retail POTS services. The same is true for OP-4 – which measures the standard installation interval.[2] But unbundled loops are not compared to these non-designed services. Because there is no retail analog against which to compare unbundled loops, the FCC, and the industry in general, recognize that comparing unbundled loops to retail POTS is not appropriate. Instead, benchmarks have been established to measure ILEC performance in

[2] Current measures of Qwest's PID performance may be found at http://www.qwest.com/wholesale/results/roc.html .

provisioning Unbundled Network Elements ("UNEs").[3] As a result, Qwest's performance measures track provisioning of unbundled loops separately, and instead of comparing them to retail POTS, unbundled loops are measured against benchmark performance standards. Qwest's fourteen states each have performance assurance plans that monitor Qwest's performance against the PIDs and provide for penalties when Qwest's performance does not meet the appropriate parity or benchmark standards.

Q. WERE QWEST'S PIDS EVALUATED DURING THE 271 APPROVAL PROCESS?

A. Yes. Qwest's performance against the PIDS was evaluated as part of the third party tests conducted here in Arizona and in Qwest's 13 other local states. The FCC determined that Qwest's performance against the PIDs was evidence that Qwest was providing CLECs with a meaningful opportunity to compete in Qwest's local territory.[4]

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[3] See for example *In re Bellsouth Corp.*, 13 FCC rcd 20599, 20717 ¶ 198 (FCC Oct. 13, 1998) "the provisioning of unbundled loops has no retail analogue"; *Id.* at 87 n. 248 "ordering and provisioning of UNEs generally has no retail analogue"; *In re Deployment of Wireline Services Offering Advanced Telecommunications Capability and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, 14 FCC Rcd 20912, 20962 n. 248 (FCC Dec. 9, 1999) "Historically, the Commission has held that most UNEs do not have a retail analog."; *21st Century Telecom of Illinois, Inc. v. Illinois Bell Telephone Company*, 2000 Ill. PUC Lexis 489 *74-75 (Ill. PUC June 15, 2000) "work required to provision an unbundled loop is substantially more extensive than work required to do 'line translation' to provision a retail POTS line".

[4] See for example *In the Matter of Application by Qwest Communications International, Inc. for Authorization To Provide In-Region, InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming,* WC Docket No. 02 – 314, FCC 02-232, December 23, 2002, ("9-State 271 Order") at ¶¶ 7, 349, K-4; *In the Matter of Application by Qwest Communications International Inc. for Authorization to Provide In-Region, InterLATA Services in Arizona*, WC Docket No. 03 -194, FCC 03-309, ("Arizona 271 Order") at ¶¶ 2, 16, C-5.

Q. WERE QWEST'S PIDS APPROVED BY THIS COMMISSION?

A. Yes. This Commission evaluated Qwest's PIDS and adopted a performance assurance plan as a condition of its approval of Qwest's 271 Application in Arizona.[5]

Q. HAS THE FCC ENDORSED PERFORMANCE MEASURES THAT RECOGNIZE THE DISTINCTION BETWEEN THE PROVISIONING OF DESIGNED AND NON-DESIGNED SERVICES?

A. Yes. In numerous decisions, the FCC has explicitly differentiated between unbundled loops (designed services) and POTS (non-designed services), and by approving performance measures that make this distinction had indicated that by definition ILECs give CLECs a meaningful opportunity to compete.[6]

Q. HAVE OTHER DECISIONS RECOGNIZED THAT THE PROVISION OF UNBUNDLED LOOPS IS NOT ANALOGOUS TO THE PROVISION OF POTS (NON-DESIGN) SERVICES?

A. Yes. Comparing the provisioning of unbundled loops to the provisioning of POTS services is like comparing apples and oranges. Because the two categories of services are substantially different in the amount and nature of work required, Qwest's processes for ordering and provisioning non-designed services differ substantially from its processes for ordering and provisioning designed services.

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[5] *In the Matter of U.S. West Communications Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, Docket No. T-00000A-97-0238, Decision No. 64888, June 7, 2002.

[6] See for example, *In Re Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide In-Region, InterLATA Service in the State of New York*, 15 FCC Rcd 3953 ¶ 8 (Rel. Dec 22, 1999); *In re Application of SBC Communications Inc., et al,. Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region, InterLATA Services in Texas*, 15 FCC Rcd 18354, 18361-18362 ¶ 13 n.33 (FCC Rel. June 30, 2000); *In re Application by Verizon New England Inc. et al., for Authorization to Provide In-Region, InterLATA Services In Maine, 17 FCC Rcd 11659 ¶ 7 (FCC Rel. June 19, 2002).*

This is a well-known difference in the industry and is supported by many commission decisions.[7]

IV EXPEDITES

Q. HAS MR. WEBBER CORRECTLY STATED THE FACTS REGARDING HOW EXPEDITES ARE HANDLED FOR QWEST'S VARIOUS CUSTOMERS?

A. No. For example, Mr. Webber states on page 12 of his testimony, "The emergency-based Expedites Requiring Approval process has been available and used by the Parties for the entire term of the existing ICA, until recently due to Qwest's unilateral decision to deny Eschelon's expedite requests." As I will explain below, Mr. Webber's statement is over-broad, and is not an accurate reflection of how Qwest handles expedites today, nor does he accurately describe how expedites have been handled over time.

Q. WHAT IS AN EXPEDITE?

A. Qwest provisions services – whether designed services like unbundled loops, or non-design services like resold POTS – according to standard intervals. These intervals were defined in the 271 process, and later in Change Management Process ("CMP") to ensure parity with Qwest's retail intervals when there is a comparable retail product.[8] There are times, however, when a CLEC such as Eschelon wants to "expedite" an order and obtain a circuit more quickly. In other words, there are times when the CLEC wants to obtain superior service to that which Qwest provides to its own customers. In the CMP, these are defined as

[7] See for example *In re Application by Bell Atlantic New York for Authorization Under Section 271 of the Communications Act to Provide IN-Region, InterLATA Service in the State of New York,* 15 FCC Rcd 3953, FCC 99-404, ¶44 (Rel. Dec. 22 , 1999) (regarding different standards to show nondiscrimination, for services that have an analogue versus those that do not have an analogue); *In Re U.S. WEST Communications, Inc.*, 2002 WL 1378630, Decision No. 64836 ¶6 (Ariz. Corp. Comm. May 21, 2002); (" In the Bell Atlantic New York Order the FCC stated that the ordering and provisioning of network elements has no retail analogue...").

[8] I will discuss the CMP separately below.

1 requests for "expedites." So an expedite is a mechanism to request that an order
2 be provisioned more quickly.

3 **Q. HOW DID QWEST DEVELOP ITS CURRENT EXPEDITE PROCESS?**

4 A. As discussed more fully in the testimony of Qwest witness Jill Martain, in
5 February 2004, Covad submitted a change request to the CMP requesting an
6 expedite process for design services, like unbundled loops. In the past, when a
7 CLEC wanted to expedite an order, it had to establish that the expedite request
8 was justified based upon a set of defined rationale. For example, it could show
9 that the order presented a "medical emergency." Qwest would then analyze the
10 request, either agree or disagree with the explanation that the request fell within
11 one of the accepted categories for expediting an order, and treat the order
12 accordingly. This resulted in debate and discussion about whether the standard
13 was satisfied. CLECs wanted more certainty than this process provided, hence
14 Covad's change request. Via the CMP, Qwest established a procedure through
15 which Qwest would provide expedites to CLECs via one of two options detailed
16 in Qwest's PCAT.[9] Which option applies depends on the product being
17 ordered.[10]

18 The first option is referred to as "Pre-Approved Expedites". Per the PCAT, this
19 option requires language in CLEC Interconnection Agreements supporting
20 expedited requests with a "per day" expedite rate. "Pre-Approved Expedites"
21 allow expedites for designed services. While a rate applies, the CLEC does not

[9] The term PCAT is derived from the words Product CATalog. At Qwest, PCATs have evolved into documents that contain much more than product information. They include all the processes and procedures necessary to enable CLECs to obtain pre-ordering, ordering, provisioning, billing and maintenance and repair services from Qwest. All of Qwest's PCATs can be found on Qwest's Wholesale website at www.qwest.com/wholesale .

[10] Qwest's current expedite process is explained in the Expedites and Escalations PCAT, attached as Exhibit RA-1.

need to justify its reasons for seeking the expedite; it can request an expedite for any reason at all.

The second option applies to products not covered in "Pre-Approved Expedites." In other words, the second option applies to non-designed services. This is referred to in the PCAT as "Expedites Requiring Approval". When an expedite is justified for these products, expedite charges do not apply.

The primary distinction is that the process defined and created in the CMP differentiates between design services and non-design (POTS) services. Eschelon wants to circumvent CMP, and apply the process meant for non-designed services to all services. Qwest makes the differentiation on the retail side of its business, and provides expedites to its retail POTS customers and its retail design services customers using two completely different processes.

Q. HAVE CLECS INTERESTED IN OBTAINING EXPEDITED ORDERS FOR UNBUNDLED LOOPS OPTED INTO THE CURRENT EXPEDITE PROCESS CREATED IN THE COMMISSION APPROVED CMP?

A. Yes. A number of CLECs have agreed to the CMP approved expedite process by signing various agreements, whether they are commercial agreements, expedite amendments, or interconnection agreements containing terms allowing for expedites for designed services. Eschelon is the only company of which Qwest is aware that wants to expedite orders for unbundled loops that has not executed the amendment for the new process.

Q. MR. WEBBER CLAIMS THAT QWEST'S EXPEDITE PROCESS FOR UNBUNDLED LOOPS IS DISCRIMINATORY. IS HE CORRECT?

A. As I will explain below, Qwest provides expedites for free for non-designed services under a specified set of circumstances to all of its customers – retail and

CLECs alike. Qwest provides expedites for designed services to all of its customers – retail and CLECs alike – at a rate of $200 per day.[11]

Q. HOW ARE EXPEDITES HANDLED FOR QWEST'S CUSTOMERS (WHETHER RETAIL OR CLECS) WHO PURCHASE DESIGN SERVICES IN ARIZONA?

A. In Arizona, all customers have access to expedites for designed services at a rate of $200 per day.

Q. HOW ARE EXPEDITES HANDLED FOR QWEST'S CUSTOMERS WHO PURCHASE POTS SERVICES (NON DESIGN SERVICES) IN ARIZONA?

A. In Arizona, all customers, both retail customers and CLECs, have access to expedites for free under the following list of conditions:

- Fire
- Flood
- Medical emergency
- National emergency
- Conditions where your end-user is completely out of service
- (primary line)
- Disconnect in error by Qwest
- Requested service necessary for your end-user's grand opening event delayed for facilities or equipment reasons with a future RFS date
- Delayed orders with a future RFS date that meet any of the above described conditions
- National Security
- Business Classes of Service unable to dial 911 due to previous order activity
- Business Classes of Service where hunting, call forwarding or voice mail features are not working correctly due to previous order
- activity where the end-users business is being critically affected[12]

[11] Expedites for designed services are not offered to any customers, retail or CLEC, in the state of Washington.
[12] See Exhibit RA-1, Expedites and Escalations PCAT.

Q. DOES QWEST DISCRIMINATE AGAINST ANY OF ITS CUSTOMERS WITH REGARD TO EXPEDITING ORDERS?

A. Absolutely not. Qwest uses one set of processes for design services, and one set of processes for POTS services. This is true whether the customer is a retail customer or a CLEC.

Q. ON PAGE 29 OF HIS TESTIMONY, MR. WEBBER DESCRIBES THE BASIS FOR HIS CONCLUSION THAT QWEST PROVIDES EXPEDITES TO ITS RETAIL CUSTOMERS THAT IT DENIES TO ESCHELON. IS HIS CONCLUSION VALID?

A. No. Mr. Webber states, "Qwest does not charge (or waives) non-recurring charges – one of which is the expedite fee – for the reestablishment of service in the case of fire, flood or other occurrences attributed to an Act of God." The key words in Mr. Webber's statement are "reestablishment of service". He is speaking of a situation where a customer needs repair. The facts of this complaint refer to Eschelon's desire for an expedite of an order. It is very important to distinguish ordering from repair. When you are seeking a repair, you are seeking to have something that is not working restored to working order. When you are placing an order, you are seeking to change the state of your service, whether it is to establish new service, change the features of existing service, or disconnect service. Ordering and requests for repair are entirely different processes. As Qwest witness Jean Novak explains in detail, Eschelon issued an order in error to disconnect the Marc Center. Eschelon later submitted an order to establish service at the Marc Center, and Eschelon asked Qwest to expedite the due date for that order. Mr. Webber's entire discussion of repair is irrelevant to the present complaint.

Q. IS IT APPROPRIATE THAT THE EXPEDITE CHARGE SHOULD BE THE SAME FOR CLEC CUSTOMERS AS IT IS FOR ALL OTHER QWEST CUSTOMERS?

A. Yes. This is the essence of non-discrimination. In its Motion for Summary Judgment, Eschelon claims that it is entitled to receive expedites in under the same terms and conditions under which Qwest offers expedites to itself and its other customers.[13] That is precisely what Qwest has offered to Eschelon. The fact that Eschelon has refused to accept the terms does not mean in any way that Qwest has discriminated against Eschelon.

Q. MR. WEBBER CLAIMS THAT QWEST'S DISCRIMINATES IN THE RATES THAT HAVE BEEN SET. HOW DO YOU RESPOND?

A. On page 31-34 of Mr. Webber's testimony, Mr. Webber states that it is unfair to charge $200 per day to expedite orders for unbundled loops and $0 to expedite orders for POTS services when emergency conditions exist. Mr. Webber rationalizes that Eschelon uses the unbundled loops to provide POTS services in competition with Qwest's POTS offerings. This argument is faulty in a number of ways.

First, the Commission has already determined that DS1 Capable Loops and DS3 Capable Loops have a retail analogue; specifically, DS1 and DS3 private lines respectively. Just as with Eschelon, Qwest's retail customers often use these private lines to provide multiple voice lines within an office. Thus, Eschelon and Qwest use these comparable facilities to perform the exact same function. When a retail customer orders a private line from Qwest and asks for an expedited due date, the $200 per day expedite charge applies.

[13] See *In the matter of the Complaint of Eschelon Telecom of Arizona, Inc. Against Qwest Corporation,* Docket No. T-01051B-06-0257, T-03406A-06-0257, Eschelon Telecom of Arizona, Inc.'s Memorandum in Support of its Motion for Summary Judgment or, In the Alternative Partial Summary Judgment, July 13, 2006, at page 20.

Second, as I noted above, every commission to analyze the issue recognizes that unbundled loops and POTS services are not comparable insofar as ordering and provisioning are concerned. Mr. Webber's arguments are improperly premised upon a finding that that these services are comparable.

Q. IN FACT, CAN ESCHELON OBTAIN EXPEDITES FOR UNBUNDLED LOOPS AT RATES, TERMS AND CONDITIONS THAT ARE BETTER THAN WHAT QWEST PROVIDES TO ITS COMPARABLE RETAIL CUSTOMERS.

A. Yes. Eschelon is able to get high capacity loops from Qwest at rates, terms and conditions that are superior to what Qwest provides to its own customers. Qwest's standard provisioning interval for DS1 and DS3 private lines is 9 days. In stark contrast, CLECs – including Eschelon- can obtain a DS1 capable loop in 5 days and a DS3 capable loop in 7 days. Thus if a customers orders a DS1 capable loop from Eschelon and wants the line delivered in one day, the order will have to be expedited 5 days, and it would cost the customer $1000 ($200 per day for 5 days). However if the same customer comes to Qwest and orders a DS1 private line and wants the line delivered in one day, the order will have to be expedited 9 days, and it would cost the customer $1800 ($200 per day for 9 days). Thus Eschelon is actually getting superior rates and conditions.

Q. DOES ESCHELON ACKNOWLEDGE THAT IT CAN OBTAIN SERVICE AT IMPROVED RATES AND CONDITIONS?

A. Functionally, yes. Eschelon admits this fact by stating that it paid $1800 to obtain an expedite on a private line via Qwest's special access tariff.[14] If Eschelon had signed an Expedite Amendment to its Interconnection Agreement, it would have received the expedited DS1 Capable Loop at a charge of $1000.

[14] See *In the matter of the Complaint of Eschelon Telecom of Arizona, Inc. Against Qwest Corporation,* Docket No. T-01051B-06-0257, T-03406A-06-0257, Eschelon Telecom of Arizona, Inc.'s Memorandum in Support of its Motion for Summary Judgment or, In the Alternative Partial Summary Judgment, July 13, 2006, at page 6.

Q. IF ESCHELON DOES NOT WANT TO PAY THE $200 PER DAY EXPEDITE CHARGE FOR AN UNBUNDLED LOOP, DOES ESCHELON HAVE OPTIONS?

A. Yes. The way to obtain expedites without paying expedite charges is to order non-designed services. Rather than an unbundled loop, Eschelon does have the option of ordering a resale POTS service, or the option of signing a commercial agreement for QPP POTS service.[15] On the other hand, unbundled loops are designed services. If Eschelon requires unbundled loops, and wishes to expedite orders for unbundled loops, Eschelon must be willing to pay the same expedite charge for these designed services that all Qwest customers pay - $200 per day.

Eschelon routinely uses QPP to serve its own customers. Indeed, as explained in the testimony of Jean Novak, Eschelon contemplated using QPP to serve the Marc Center, but for unknown reasons, opted against it.

V ESCHELON'S CURRENT INTERCONNECTION AGREEMENT

Q. DID MR. WEBBER CORRECTLY IDENTIFY THE TERMS OF ESCHELON'S INTERCONNECTION AGREEMENT WITH REGARD TO EXPEDITES?

A. No. A significant premise of Mr. Webber's argument is that Eschelon's current interconnection agreement allows Eschelon to request expedites for unbundled loops.[16] In fact, the very provisions of the interconnection agreement that Mr. Webber cited make it clear that Qwest (then US WEST) makes the determination as to whether an expedited interval will be provided.

> 3.2.2.13 Expedites: U S WEST shall provide CO-PROVIDER the capability to expedite a service order. Within two (2) business hours after a request from CO-PROVIDER for an expedited

[15] QPP is Qwest's commercial offering that replaces UNE-P, which the FCC determined was no longer a UNE.

[16] See *Webber Direct* at page 9.

order, **U S WEST shall notify CO-PROVIDER of U S WEST's confirmation to complete, or not complete, the order within the expedited interval.** (emphasis added)[17]

Q. DOES THE ESCHELON ICA SPECIFICALLY GIVE QWEST THE UNILATERAL RIGHT TO REJECT A REQUEST FOR AN EXPEDITE?

A. Yes. As the language quoted above clearly indicates, Qwest decides whether or not the request for an expedited interval will be completed.

Q. DID ESCHELON NEGOTIATE ITS OWN INTERCONNECTION AGREEMENT WITH QWEST?

A. No. Eschelon opted into AT&T's Interconnection Agreement.

Q. WHAT DOES AT&T'S INTERCONNECTION AGREEMENT SAY REGARDING EXPEDITES?

A. As Mr. Webber pointed out, the AT&T Interconnection agreement that Eschelon opted into states:

> 3.2.2.13 Expedites: U S WEST shall provide CO-PROVIDER the capability to expedite a service order. Within two (2) business hours after a request from CO-PROVIDER for an expedited order, U S WEST shall notify CO-PROVIDER of U S WEST's confirmation to complete, or not complete, the order within the expedited interval.

Q. DID QWEST AND ESCHELON NEGOTIATE AN EXPEDITE PROCESS?

A. The only negotiations between Qwest and Eschelon have occurred within the context of CMP. As explained in the testimony of Jill Martain, Qwest and the

[17] Note that this section of Eschelon's Interconnection Agreement, contained in Att. 5, which Mr. Webber cited on page 9 of his testimony, pertains to Business Process Requirements. This section is a generalized document of procedures and it makes no mention of unbundled loops. Specifics regarding unbundled loops are contained in Att. 3. So there is no explicit statement that expedites will be provided for unbundled loops in Eschelon's current contract.

CLEC community including Eschelon modified the expedite process many times in the CMP. As Qwest witness Jill Martain explains, Eschelon did not complain about this process until November of 2005. Instead, Eschelon took advantage of the myriad of changes made by the CMP to the expedite process. Moreover, CMP is the industry recognized process for making product and process changes. Eschelon's substantial involvement in the process – including successfully obtaining 188 of Eschelon's 228 proposed changes in CMP – makes this very point. CMP is the process that satisfies the requirement for a mutually developed process set forth in the ICA.

Q. DID QWEST AND ESCHELON EVER ATTEMPT TO NEGOTIATE AN EXPEDITE PROCESS PER THE CONTRACT THAT ESCHELON OPTED INTO?

A. No. The only discussions that Qwest has ever had with Eschelon about the expedite process have occurred in CMP. Thus, the CMP has always been the process used by Qwest and Eschelon to create expedite processes.

Q. DOES THE ESCHELON ICA SPECIFICALLY RECOGNIZE THAT QWEST IS ENTITLED TO OBTAIN A PAYMENT FOR EXPEDITING ORDERS?

A. Yes. The same portion of the interconnection agreement that Mr. Webber cites, Att. 5, contains three specific statements that expedite charges may apply:

> 3.2.4.2.1 If CO-PROVIDER requests a due date earlier than the standard due date interval, then **expedite charges may apply**. (emphasis added)

> 3.2.4.3.1 If CO-PROVIDER requires a due date earlier than the U S WEST offered due date and U S WEST agrees to meet the CO-PROVIDER required due date, then that required due date becomes the committed due date and **expedite charges may apply.** (emphasis added)

> 3.2.4.4 Subsequent to an initial order submission, CO-PROVIDER may request a new/revised due date that is earlier than the committed due date. If U S WEST agrees to meet that new/revised due date, then that new/revised due date becomes the committed due date and **expedite charges may apply.** (emphasis added)

Thus, the Eschelon ICA makes plain in three separate provisions that fees may apply for expediting services. The ICA never states that Eschelon is entitled to obtain an expedited due date for free.

Q. SO WHAT IS THE CURRENT STATUS OF ESCHELON'S INTERCONNECTION AGREEMENT REGARDING EXPEDITES?

A. Because Eschelon has not signed an expedite amendment to its current interconnection agreement, Eschelon only has access to expedites per the terms of its agreement with Qwest. Eschelon's current agreement gives Qwest the discretion to determine when expedites will be provided. Based on Qwest's current processes and procedures, which are governed by the CMP and not by the terms of interconnection agreements, Qwest offers expedites for free for non-designed services under specific circumstances outlined in Qwest's PCAT. Qwest offers expedites at a fee of $200 per day to those CLECs who have terms in their interconnection agreement regarding expedites for designed services, or who have signed an expedite amendment. Eschelon does not have terms in its interconnection agreement permitting expedites for designed services, and Eschelon has refused to sign an expedite amendment. Based on its interconnection agreement and Qwest's processes and procedures for expedites, Eschelon does not have access to expedites for designed services, therefore Eschelon does not have access to expedites for unbundled loops.

Q. DOES THE CURRENT EXPEDITE PROCESS CREATED IN CMP VIOLATE THE TERMS OF THE ESCHELON INTERCONNECTION AGREEMENT?

A. No. As I stated above, the expedite process created in the CMP constitutes a process or procedure. Processes and procedures are managed in the CMP and are not intended to be part of interconnection agreements, which are documents of terms and condition. As Mr. Webber indicated, the CMP Document itself states that processes developed in the CMP do not trump terms of individual interconnection agreements.[18] As I noted above, Eschelon has no terms in its interconnection agreement regarding the specific processes and procedures for expedites. Therefore, the expedite process developed in the CMP does not violate Eschelon's interconnection agreement. And since Eschelon did not negotiate terms for expedites as part of its interconnection agreement, Mr. Webber's discussion of section 7.1 of the ICA, regarding amendments to the interconnection agreement, cited on page 13 of his testimony is not applicable to this dispute.

Q. MR. WEBBER CITES LANGUAGE FROM THE ICA RELATING TO MAINTENANCE AND REPAIR ON PAGE 20 OF HIS TESTIMONY. DOES THIS LANGUAGE HAVE ANYTHING TO DO WITH THIS DISPUTE, AND EXPEDITING ORDERS?

A. Not at all. First, the sections cited by Mr. Webber make no mention of expedites. Second, as I noted above, this specific dispute is about an expedite request for an order. The FCC has long recognized the differences between ordering, and repair. In fact the FCC recognizes five separate functions, and based its section 271 analysis of Qwest's systems on these five separate functions:

> Under checklist item 2, a BOC must demonstrate that it provides nondiscriminatory access to the five OSS functions: (1) pre-ordering;

[18] See Exhibit RA-1, Section 1.0 Introduction and Scope.

(2) ordering; (3) provisioning; (4) maintenance and repair; and (5) billing.[19]

Again, Mr. Webber's discussion of maintenance and repair is irrelevant and clouds the issue. While Qwest does offer expedites for repair, the issue in dispute is not about a request for repair. The questions in this case concern ordering.

Q. SHOULD ESCHELON BE BARRED FROM ARGUING THAT THE EXPEDITE PROCESS DEVELOPED IN CMP VIOLATES ITS ICA?

A. Absolutely. As shown above, the expedite process developed in CMP that requires payment of a $200 per day fee does not violate any of the express terms of Eschelon's ICA. Eschelon has routinely utilized the process changes developed in CMP to its benefit. Eschelon has personally requested 94 change requests in CMP for product and process changes; of these 73 have been adopted. In each instance, Eschelon has never obtained a modification to its ICA. Instead, the parties continued operating under the existing ICA, while utilizing the new CMP approved processes. This is exactlty what should occur for expedites. But Eschelon is now arguing that a process violates its ICA because it was developed in CMP. Eschelon's position is inconsistent with its own prior conduct.

Q. IS MR. WEBBER'S TESTIMONY ABOUT THE SPECIFICS OF THE PROBLEM AT THE MARC CENTER ACCURATE WITH REGARD TO THE SERVICES INVOLVED?

A. No. First, the details regarding Eschelon's ordering error and the impact on its customer, the Marc Center, will be discussed in detail by Qwest Witness Jean Novak. I will concentrate here on a discussion of the services. Mr. Webber

[19] See 9 State Order at ¶ 34.

claims on page 28 of his testimony that Qwest violates its obligation not to discriminate because it provides expedites to its resale and QPP customers. Mr. Webber is comparing apples to oranges. When Mr. Webber speaks of resale and QPP, he is speaking of POTS services, which as I discussed above are non-designed services. This is true because he claims that expedites are available for these services for free. As I explained above, orders for non-designed services can be expedited for free under specific circumstances. The service at issue in this complaint was a DS1 capable loop, in other words, a high capacity loop. This is a designed service. As I have already discussed above, expedites are only available for designed services at a fee of $200 per day, and only if a party's interconnection agreement permits. So Mr. Webber's comparison is not appropriate, and is not evidence that Qwest discriminates in any way.

Q. MR. WEBBER'S TESTIMONY CONTAINS A SIGNIFICANT DISCUSSION WITH REGARD TO DISCRIMINATION. IS QWEST PERMITTED TO DISCRIMINATE?

A. Certainly not. In fact the terms of the interconnection agreement explicitly state that Qwest is required to treat all CLECs in the same manner:

> 31.1 U S WEST shall conduct all activities and interfaces which are provided for under this Agreement with CO-PROVIDER Customers in a carrier-neutral, nondiscriminatory manner.[20]

Ironically, what Eschelon seeks here, expedites for unbundled loops (designed services) under the terms meant for non-designed services, is to receive preferential treatment as compared to every other CLEC. Eschelon is asking this Commission to force Qwest to give Eschelon different (better) terms than Qwest gives to all other CLEC and retail customers. That is not appropriate.

[20] Eschelon Interconnection Agreement, PartA.

VI THE CHANGE MANAGEMENT PROCESS

Q. WHAT IS THE CMP?

A. From a CLEC's perspective, the purpose of CMP is to provide CLECs with a meaningful opportunity to modify Qwest's systems, processes and procedures. From Qwest's perspective, CMP is to ensure that Qwest can implement uniform systems, processes and procedures so it can train its people and perform at a consistently high level of quality for its wholesale customers. For all parties, the CMP provides a uniform mechanism for communications about Qwest's systems, processes and procedures.

Q. WHAT IS THE PURPOSE OF THE CMP?

A. CMP was established for the specific purpose of ensuring that system and process changes are clearly communicated to CLECs. It allows all CLECs to participate in Change Request ("CR") clarification and solution design meetings. CMP further provides detailed tracking of each CR through to final disposition, so that any interested party can track the status of any particular CR. Further, the CMP allows all CLECs to learn about and anticipate the impacts a change may have on their operations, and to voice concerns and request changes to mitigate adverse impacts associated with a change. CMP was created to allow such CLECs to voice their concerns and work toward an equitable solution that better meets the larger community's needs. CLECs participated with Qwest in designing the CMP and have accepted it as the mechanism for changing systems that affect multiple CLECs. The CMP process provides an established forum and, more importantly, existing procedures designed to ensure that the needs of the broader CLEC community are addressed.

Q. HOW WAS THE CMP CREATED?

A. The current CMP was designed by a joint group that included Qwest and a number of CLECs. Eschelon was an active participant in this process. Meetings took place between the fall of 2001 and the fall of 2002. The end result was the Wholesale Change Management Process Document which governs the CMP today.[21]

Q. IS QWEST OBLIGATED TO PROVIDE A CMP?

A. Yes. In order to receive approval from the FCC to provide long distance, ILECs like Qwest were required to establish that they met the criteria of a 14-point checklist. Checklist Item 2 involved required the ILECs to provide access to Unbundled Network Elements ("UNEs"). One of the required UNEs was access to Operational Support Systems ("OSS"). The FCC stated, "The Commission has explained that it must review the BOC's change management procedures to determine whether these procedures afford an efficient competitor a meaningful opportunity to compete by providing sufficient access to the BOC's OSS."

Q. DID THE FCC DETERMINE THAT QWEST'S CMP AFFORDS AN EFFICIENT COMPETITOR A MEANINGFUL OPPORTUNITY TO COMPETE?

A. Yes. The FCC stated, "We find that Qwest's current Change Management Process ("CMP") is clearly drafted, well organized, and accessible." In fact, the FCC noted that Qwest' CMP covers more than was required by the FCC, as it includes changes to products and processes.

> We also note that the Commission has recognized that changes that do not impact OSS interfaces are not necessarily required to be part of a change management process.

[21] I have attached the current CMP Document as Exhibit RA-2.

The FCC also noted, "We find in particular that Qwest's CMP provides competitive carriers with substantial opportunities to address Qwest's proposed changes and to initiate their own changes." And the FCC stated,

> We find that the Qwest CMP provides a sufficient mechanism for resolving impasses between Qwest and competitive LECs. The CMP provides a detailed process for escalations whereby a Qwest employee (Director or above) is assigned to the escalation. In the event the competitive LEC wishes to further dispute an issue, there is a defined dispute resolution process which provides for arbitration, mediation, or submission to the appropriate regulatory agency.

Q. HAS THE CMP BEEN EVALUATED BY THIS COMMISSION?

A. Yes. As a part of Qwest application for Section 271 approval in this state, this Commission reviewed Qwest's CMP. This Commission found that Qwest's CMP met the requirements of Section 271.[22]

Q. HOW IS THE CMP GOVERNED?

A. The processes and procedures for the CMP and the roles and responsibilities of the CMP participants are clearly delineated in the Qwest Wholesale Change Management Process Document. The provisions of this document were developed jointly by Qwest and CLECs.

Q. WHAT IS THE SCOPE OF CMP?

A. As stated in the CMP Document, the CMP manages changes to:

> Operations Support Systems (OSS) Interfaces, products and processes (including manual) as described below. CMP provides a means to address changes that support or affect pre-ordering, ordering/provisioning,

[22] *In the Matter of U.S. West Communications Inc.'s Compliance with Section 271 of the Telecommunications Act of 1996*, Docket No. T-00000A-97-0238, Decision No. 66224, August 28, 2003.

maintenance/repair and billing capabilities and associated documentation and production support issues for local services (local exchange services) provided by Competitive Local Exchange Carriers (CLECs) to their end users. This CMP is applicable to Qwest's 14 state in-region serving territory.

Q. DO CHANGES MADE VIA THE CMP TRUMP PROVISIONS CONTAINED IN INDIVIDUAL CLEC INTERCONNECTION AGREEMENTS?

A. No. Mr. Webber cited the following provision, but it is worth noting again. The CMP Document clearly states in its introduction:

> In cases of conflict between the changes implemented through this CMP and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement. In addition, if changes implemented through this CMP do not necessarily present a direct conflict with a CLEC interconnection agreement, but would abridge or expand the rights of a party to such agreement, the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such agreement.

None of the parties believed that the CMP should be used as a mechanism to subvert commitments established via Interconnection Agreements. But the converse should also be true. Interconnection Agreements should not be used as a mechanism to subvert the CMP. Interconnection Agreements should not contain such product, process and systems operational specifics that these items cannot be managed via the CMP as intended. Any such provisions in an interconnection agreement would make it impossible for the CMP participants to change processes without first obtaining an amendment (and agreement from the parties) to that Interconnection Agreement.

Q. MR. WEBBER SUGGESTS ON PAGE 18 OF HIS TESTIMONY THAT ESCHELON HAS NO CHOICE BUT TO PARTICIPATE IN CMP, AND THE REMAINDER OF HIS CMP DISCUSSION SUGGESTS THAT ESCHELON AND OTHER CLECS ARE AT THE MERCY OF QWEST IN THE CMP. DOES ESCHELON'S PARTICIPATION IN THE CMP REFLECT THIS?

A. Not at all. As I will demonstrate below, Eschelon has been a very active and very vocal participant in CMP and has had a significant influence on CMP outcomes.

Q. DID ESCHELON PARTICIPATE IN THE CMP REDESIGN DISCUSSED ABOVE?

A. Yes. According to the records of the CMP Redesign, Eschelon was an active and vocal participant in the CMP Redesign process, meaning that Eschelon had a hand in the design of the CMP as it exists today.[23]

Q. HAS ESCHELON BEEN AN ACTIVE PARTICIPANT IN CMP MEETINGS?

A. Yes. A review of CMP Meeting Minutes indicates that since April 2001, Eschelon has had representatives present at all 130 Monthly Systems CMP meetings, and all 65 monthly Product and Process meetings.[24] Additionally, for all but a portion of one meeting, Eschelon has had more than one representative present. Eschelon has had as many as six representatives present for one individual meeting.

Q. HAS ESCHELON SUBMITTED CHANGE REQUESTS TO THE CMP?

A. Yes. Through June of 2006, Eschelon submitted 134 Systems change requests and 94 Product and Process change requests to the CMP. The vast percentage

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[23] CMP Redesign Meeting minutes and participant records are available on Qwest's Wholesale website at http://www.qwest.com/wholesale/cmp/redesign.html .

[24] Participants may appear at meetings in person or by telephone. CMP Meeting minutes can be found at http://www.qwest.com/wholesale/cmp/teammeetings.html .

– 82% – of Eschelon's change requests (115 of the systems change requests and 73 of the product and process change requests) have been accepted by Qwest and sent on through the CMP process.[25]

Q. HAS ESCHELON OBJECTED TO QWEST NOTIFICATIONS?

A. Yes. Through May 2006, Qwest received 63 requests to change the disposition or objections to a Qwest Product or Process Level 1 through Level 4 notice from all CLECs combined. Of these 63, 41 challenges came from Eschelon. In response to 52 of the 63 challenges, through discussion with the CLEC community, Qwest retracted the notice, modified the PCAT wording, changed the disposition level of the notice, or retracted the notice and submitted a change request in its place. Of the remaining 11, after further clarification was provided by Qwest, there was no need for Qwest to provide any change to the notification or PCAT wording.

Q. WHAT IS THE CMP OVERSIGHT COMMITTEE?

A. Per Section 18.0 of the CMP Document, the Oversight Committee exists to resolve disputes that cannot be resolved via other available dispute resolution mechanisms outlined in the CMP Document. These issues include:

- Improper notification under CMP
- No notification under CMP
- Issues regarding scope of CMP
- Failures to adhere to CMP
- Interpretations of CMP
- Gaps in CMP

[25] Eschelon has submitted more change requests to the CMP than any other CLEC. Contrary to Mr. Webber's assertion at page 18 of his testimony that Eschelon is a "large wholesale customer", the proportion of change requests that Eschelon has submitted in comparison to other CLECs is much larger that the proportion of revenue that Qwest receives from Eschelon as a customer.

The Oversight Committee is comprised of one participant from Qwest, one participant each from six CLECs, and one participant from each state commission that wishes to participate.

Q. IS ESCHELON A MEMBER OF THE CMP OVERSIGHT COMMITTEE?

A. Yes. Based on the Oversight Committee Roster posted on Qwest's Wholesale website, Eschelon is represented on the Oversight Committee by Bonnie Johnson. As a participant on the Oversight Committee, Eschelon has an even greater degree of influence over the CMP.

Q. MR. WEBBER'S DISCUSSION OF THE CMP ON PAGES 18-20 SUGGESTS THAT QWEST HAS THE POWER TO ACT ARBITRARILY IN THE CMP. IS THIS TRUE?

A. Absolutely not. As discussed in great detail in the testimony of Jill Martain and I will discuss below, the CMP contains provisions that prohibit Qwest from acting arbitrarily. It also contains provisions that give CLECs several means to object to any actions taken by Qwest in the CMP.

Q. IS QWEST PERMITTED TO DENY CLEC CHANGE REQUESTS, AS IT APPARENTLY DID SOME OF ESCHELON'S CHANGE REQUESTS?

A. Yes. The CMP governing document allows Qwest to deny a change request for one or more of the following reasons:

- Technologically not feasible – a technical solution is not available
- Regulatory ruling/Legal implications – regulatory or legal reasons prohibit the change as requested, or if the request benefits some CLECs and negatively impact others (parity among CLECs) (Contrary to ICA provisions)

- Outside the Scope of the Change Management Process – the request is not within the scope of the Change Management Process (as defined in this CMP), seeks adherence to existing procedures, or requests for information

- Economically not feasible – low demand, cost prohibitive to implement the request, or both

- The requested change does not result in a reasonably demonstrable business benefit (to Qwest or the requesting CLEC) or customer service improvement

Qwest will not deny a CR solely on the basis that the CR involves a change to back-end systems. Qwest will apply these concepts to CRs that Qwest originates.

The CMP designers, which included CLECs, determined that it was reasonable for Qwest to be able to deny change requests for those listed reasons.

Q. DOES QWEST'S ABILITY TO DENY CRS AS PERMITTED BY THE CMP DOCUMENT MEAN THAT QWEST CAN ACT ARBITRARILY IN THE CMP?

A. Not at all. First a denial must be for one of the reasons listed above. But a denial is not the end of the road for the CR. The CMP Document provides several options to CLECs who wish to object to the denial. The CMP Document also provides several options for CLECs who wish to object to a change submitted to the CMP by Qwest.

- Chapter 14 details the Escalation process that CLECs may use to object to a change. Qwest is obligated to respond to escalations based on the procedures outlined in this chapter.

- Chapter 15 details the Dispute Resolution Process that permits Qwest or a CLEC to take an item that has not been resolved to arbitration or to a state commission for resolution.

- Chapter 16 provides the procedures for making an Exception Request to the CMP for a change that is an exception to normal CMP processes. Such a change requires a Vote of the CMP members.

- Chapter 17 explains the voting procedures at the CMP when votes are required. Key to this section is the provision that every carrier (including Qwest) has 1 vote in the CMP.

- Chapter 18 details the process for submitting disputes to the CMP Oversight Committee for Review.

Q. IF QWEST DENIES A CR BECAUSE IT IS ECONOMICALLY NOT FEASIBLE, CAN THIS CR STILL BE ACCOMPLISHED?

A. Yes. The CMP Document contains a Special Change Request Process (SCRP), which may be invoked for such a CR. This process allows a CLEC to fund the work to be done by Qwest.

Q. IS QWEST PERMITTED TO MAKE ANY CHANGES WITHOUT FIRST NOTIYING CLECS?

A. Only in a very specific circumstance. Chapter 5 of the CMP Document provides details regarding procedures for the types of product and process changes that Qwest can make. In section 5.4, the document states that only Level 0 product and process changes are deemed effective immediately, without notification to CLECs. These changes "are defined as changes that do not change the meaning of documentation and do not alter CLEC operating procedures." An example of a Level 0 change is the correction of a typographical error. All other product and process changes require notification to CLECs. The notification process gives CLECs the opportunity to comment on or object to the identified change. If CLECs are not satisfied with Qwest's response to their objections, then they have recourse via the mechanisms listed above. As noted above, Eschelon has made objections to Qwest notifications, and Qwest has responded.

1 **Q. IS MR. WEBBER'S TESTIMONY THAT THE EXPEDITE PROCESS WAS**
2 **SUDDENLY CHANGED AFTER SIX YEARS CREDIBLE, GIVEN ESCHELON'S**
3 **ACTIVE PARTICIPATION IN THE CMP?**

4 A. No. It is clear that Eschelon was well aware of the changes to the expedite
5 process. In fact, as Qwest witness Jill Martin will discuss in detail, Eschelon
6 made a number of comments on the record during the evolution of the expedite
7 process.

8 **VII CONCLUSION**

9 **Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

10 A. My testimony demonstrates that Qwest does not discriminate against any
11 customer in the provisioning of expedites. All customers have access to
12 expedited orders for non-designed services for free under specific
13 circumstances. All customers have access to expedited orders for designed
14 services for $200 per day. Through this complaint, Eschelon is seeking special
15 treatment that would give Eschelon alone access to expedites for designed
16 services for free. My testimony demonstrates that by its pattern of conduct,
17 Eschelon has taken full advantage of the CMP and that Qwest has not and
18 cannot act arbitrarily in the CMP. Finally, my testimony demonstrates that Qwest
19 is operating in full compliance with the terms of Eschelon's Interconnection
20 Agreement.

21 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

22 A. Yes, it does.

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM A. MUNDELL
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner
BARRY WONG
Commissioner

IN THE MATTER OF THE COMPLAINT OF ESCHELON TELECOM OF ARIZONA, INC. AGAINST QWEST CORPORATION	)	DOCKET NO. T-03406A-06-0257 DOCKET NO. T-01051B-06-0257

EXHIBITS

OF

RENÉE ALBERSHEIM

ON BEHALF OF

QWEST CORPORATION

AUGUST 28, 2006

Arizona Corporation Commission
DOCKET NO. T-03406A-06-0257
DOCKET NO. T-01051B-06-0257
Qwest Corporation
Exhibits of Renée Albersheim
Exhibit RA-1

Wholesale

Expedites and Escalations Overview - V41.0

History Log

Introduction

Qwest quickly responds to your escalation or expedite requests offering you clear and complete explanations so you can satisfactorily respond to your end-users.

- Expedites are requests for an improved standard interval that is shorter than the interval defined in our Service Interval Guide (SIG) or your interconnection Agreement (ICA), Individual Case Basis (ICB) or committed to ICB (Ready for Service (RFS) + Interval) date.
- Escalations can be initiated for any issue, at anytime, and at any escalation point. Escalations can also be for requests for status or intervention around a missed date.

The following summarizes the processes used within Qwest for all Wholesale Products and Services to handle expedite and escalation requests.

Expedites

Requesting an expedite follows one of two processes, depending on the product being requested. If the request being expedited is for a product contained in the "Pre-Approved Expedites" section below, your ICA must contain language supporting expedited requests with a "per day" expedite rate. If the request being expedited is for a product that is not on the defined list, then the expedited request follows the process defined in the "Expedites Requiring Approval" section below.

Expedites Requiring Approval

For products not listed in the Pre-Approved Expedite section below, (non-designed products such as POTS, Centrex or DSL service) the following expedite process applies. Expedite charges are not applicable with the Expedites Requiring Approval process.

Following is a list of conditions where an expedite is granted:

- Fire
- Flood

- Medical emergency
- National emergency
- Conditions where your end-user is completely out of service (primary line)
- Disconnect in error by Qwest
- Requested service necessary for your end-user's grand opening event delayed for facilities or equipment reasons with a future RFS date
- Delayed orders with a future RFS date that meet any of the above described conditions
- National Security
- Business Classes of Service unable to dial 911 due to previous order activity
- Business Classes of Service where hunting, call forwarding or voice mail features are not working correctly due to previous order activity where the end-users business is being critically affected

For any of the above conditions, expedited request can be made either prior to, or after, submitting your service request.

To request an expedite on a Local Service Request (LSR) you can either:

- Submit the request with your expedited due date and populate the EXP field. Also include in REMARKS the reason for the expedited request and then call the Qwest Call Center.
- Submit the request with a due date interval from our SIG or your ICA and then call the Qwest Call Center.

In both scenarios, a call to the Qwest Call Center is required on 1-866-434-2555 to process the expedited request.

To request an expedite on service requests issued via an Access Service Request (ASR), you may use either of the options described above for LSRs to submit the ASR. You should then call 1 800-244-1271.

You may be asked to provide verification of the expedited reason or situation for any of the expedite reasons listed above. In some cases, you may be asked for the service order number that caused the expedite condition, such as the service order number that caused the hunting or call forwarding expedite. The type of verification required will depend on the specific circumstances of the expedite and will be determined on an Individual Case Basis (ICB).

Once your expedite request is received, your Wholesale representative will review the request based on the previous list of available expedite scenarios to determine if the request is eligible for an expedite. If approved, the next step is to contact our Network organization to determine resource availability.

Depending on the type of service on the account, the following action is taken once the request is determined to be eligible for an expedited due date:

Non-Designed/No Dispatch Required

For requests that do not require a dispatch, the order is issued with the expedited due date.

Non-Designed/Dispatch Required

For requests that require a dispatch, the Network organization is

contacted to determine Technician availability. If appointments are available on the requested due date, your expedite is granted. If no appointments are available, then Qwest will offer an alternative date, if one is available, prior to the requested due date. You can expect to receive a response to your expedited request usually within four business hours.

Designed Services

For Designed Services, the Network organization is contacted to determine resource availability for the Central Office and Outside Technicians as well as for the Testers that work with you to accept the service. You can expect to receive a response usually within four business hours.

Approved Expedited Requests

If the expedited request is approved and the original request contained the expedited due date and the EXP field was populated, Qwest will return a Firm Order Confirmation (FOC) acknowledging the agreed to expedited due date. If the expedited or agreed to due date is different from what was originally submitted on the ASR or LSR, Qwest will contact you and request that you supplement your request with the agreed to expedited date. The EXP field on the supplement ASR or LSR must also be populated. If the supplement is not received within four business hours, Qwest will continue to process the ASR or LSR as if the expedited request was not received and will FOC back the standard interval or the original due date provided on the ASR or LSR if it was longer than the standard interval.

Denied Expedited Requests

If denied, then we will provide you reasons that the request was denied or we will offer an alternative date that we could install the service. If the request is denied, and you still want to continue to have Qwest provision the service request, Qwest will return a FOC with the standard interval or the original due date provided on the FOC if it was longer than the standard interval.

Pre-Approved Expedites

The Pre-Approved expedite process is available in all states except Washington for the products listed below when your ICA contains language for expedites with an associated per day expedite charge.

Note: Resold Designed products are automatically included based on the terms and conditions outlined in the ICA and individual state tariffs, catalogs or price lists.

For products other than the Resold Design products identified below, if your contract does not contain the appropriate expedite language, you will not be able to expedite the request unless the expedite is due to a Qwest caused reason.

The Expedites Requiring Approval section of this procedure does not apply to any of the products listed below (unless you are ordering services in the state of WA).

An expedite charge applies per ASR or LSR for every day that the due date interval is improved, based on the standard interval in the SIG, ICA, or ICB criteria as described above. It is not necessary for you to call into Qwest to have the expedite approved. To expedite a service request on

an ASR or LSR you must populate the EXP field and put the desired expedited due date in the DDD field on the ASR or LSR.

Note: If the ASR/LSR you are submitting requests a same day due date, your request must be received before 12 noon MT.

When Qwest receives an ASR or LSR with the EXP populated and the DDD is less than the standard interval, Qwest will determine if the request is eligible for an expedite without a call from you. If the request meets the criteria for the Pre-Approved Expedite process, Qwest will process the request and return a FOC acknowledging the expedited due date. The appropriate expedite charge will be added to your service order.

If the request does not meet the criteria for the Pre-Approved Expedite process, the ASR or LSR will be processed using the standard interval that is defined in the Standard Interval Guide for Resale, UNE and Interconnection Services.

Following is a list of the products, which require expedite language in the ICA and may be expedited that will receive the appropriate Expedite Charge:

- UBL
- UBL DID (Unbundled digital trunk)
- UBL DS1 (Unbundled digital trunk facility)
- UNE-C PL (EEL)
- UNE-P ISDN BRI
- UNE-P DSS Facility
- UNE-P DSS Trunk
- UNE-P PRI ISDN Facility
- UNE-P PRI ISDN Trunk
- UNE-P PBX Designed Trunks
- UNE-P PBX DID IN-Only Trunks
- Port In/Port Within associated with any of the applicable designed products listed above
- UDIT
- LIS
- CCSAC SS7 Trunk or Facility
- Unbundled Dark Fiber

Following is a list of Resold Designed Products, which do not require an amendment, which may be expedited and will receive the appropriate expedite charge:

- Analog PBX DID
- Private Line (DS0, DS1, DS3 or above)
- ISDN PRI T1
- ISDN PRI Trunk
- ISDN BRI Trunk
- Frame Relay Trunk
- DESIGNED TRUNKS (Includes designed PBX trunks) Trunk
- MDS / MDSI (IIS Only)
- DPAs (multiple DPAs or FX, FCO) Trunk
- Port In/Port Within associated with any of the applicable designed products listed above

Note: Any requests that are expedited due to a Qwest caused reason, do not incur an expedite charge. Additionally, if the due date of an expedited request is missed due to Qwest reasons, expedite charges do not apply.

If the order becomes a Delayed Order on the due date, Qwest will cooperatively work with you to obtain the best Ready For Service date

(RFS) possible and expedite charges do not apply.

If an order becomes delayed for facilities prior to the due date, once Qwest establishes a new RFS it is communicated to you via the FOC. If you do not accept the due date that is established and request to expedite the RFS, expedite charges may apply. Each expedited delayed order request will be reviewed on an ICB to determine if expedite charges apply. If the expedited due date request results in Qwest incurring additional costs to improve the date that was FOC'd, expedite charges apply. Qwest will advise you if expedite charges apply prior to confirming the expedited request to obtain approval from you, or offer an alternate date that Qwest can meet. The expedite charges will be based on the number of days improved from the original RFS date.

If an order was delayed due to a Customer Not Ready (CNR) condition as described in the Provisioning and Installation Overview; and you wish to expedite the newly requested due date, supplement the request with the new Desired Due Date and populate the EXP field of the LSR/ASR. Qwest will review your expedited request for resource availability. In some cases, we may contact you to advise resources for expedite are not available or offer an alternate date. Expedite charges apply and are based on the number of days the CNR standard interval is improved.

Expedites Supporting Non-Qwest caused Restoral Requests

This process includes Restoral Requests on Resale/UNE-P/Retail to Resale or UNE-P Conversions and Transfer of Service when the service orders have completed. This process applies to Resale/UNE-P POTS, Resale/UNE-S and Resale UNE-P Centrex 21 products, including DSL.

You will follow this documented Expedite process as outlined when you require an expedite to a standard interval in order to restore an end-user due to a Non-Qwest caused out of service condition. An expedite restoral request is a result of your inability to complete a conversion or outside move service request where you were unable to cancel or change the due date on the service order(s) prior to order completion. Restoral requests may involve you alone, a Qwest Retail account and you, or you and a different CLEC on conversion and outside move (T & F) type service order's. Restoral requests will be accepted for both full and partial restorals.

When an expedite restoral request situation occurs, refer to the following when you prepare your service request:

- Issue the Restoral Request LSR as directed per the Decision Charts and order type scenario's.
  - Populate the RPON field with the PON used on the original LSR if available
  - Populate the EXP field
  - Populate Manual IND = Y
  - The REMARKS field can be populated with the specific reason for the request such as:
    - Restoral request Full, Resale to UNE-P conv, restore original service, Or
    - Restoral request, Partial, Resale to UNE-P conv, restore original service, Or
    - Restoral request, Partial, UNE-P to Resale conv, restore original service, Or
    - Restoral request, Full, Resale or UNE-P T&F, restore F location, etc., Or
    - Restoral Request, Restore original full service back to CLEC XXXX, Or
    - Restoral Request, Restore original partial service back

to CLEC XXXX, Or
  - Restoral Request, Restore original F Loc service, full/partial back to old CLEC
  - Restoral Request, Disc service, restore original Retail service, full/partial
- Contact the Customer Service Inquiry and Education (CSIE) Center at 866-434-2555
- Open an Escalation ticket.
- Request a Restoral Request for Previous Service.
- Provide LSR ID if appropriate per Decision Chart and order type scenario's.

Benefits

- Expedited intervals for restoral of previous service
- Uniform documented process for restoral requests
- Qwest will negate the one month minimum billing on a disconnect or conversion service order as applicable.

Restrictions

- You must issue appropriate LSRs first (if directed to do so per the Decision Chart below) followed by opening a Call Center escalation ticket. Restoral requests received prior to new LSR issuance will not be accepted, excludes Qwest Retail restorals.
- Standard intervals must be used when submitting LSRs, CSIE will expedite due date appropriately for restoral
- Expedited restoral requests must be requested within 24 hours, extending into the next business day, following the LSR completion date. Restoral requests received after 3 PM will be considered next business day work activity; this includes restoral requests received after 3 PM on Saturday based on the SIG (except for DSL)."
- Service being restored must be the same type of service with same features, same TN's, etc. as was previously provisioned. Full or partial restorals are acceptable.
- Qwest will reuse facilities when the facilities are available for the restoral.
- All applicable recurring and non-recurring charges will apply, based on order completion and physical work that was completed or needs to be completed to restore service. Retail practices will apply when restoring Qwest Retail accounts.
- When a restoral involves two CLECs, it is up to you and the old CLEC to coordinate and agree upon an expedite, prior to opening up the Call Center Escalation ticket(s).
- Expedite charges may apply based upon individual interconnection agreements, state tariffs or SGATS.

The following **Order Type Scenario's** are included in this restoral process:

1. Resale / UNE-P T & F, same CLEC
2. Resale to UNE-P Conversion as is, same CLEC
3. Resale to UNE-P Conversion as specified, same CLEC
4. UNE-P to Resale Conversion as is, same CLEC
5. UNE-P to Resale Conversion as specified, same CLEC
6. Resale / UNE-P Migration to new CLEC with move via single LSR
7. Resale to UNE-P Conversion as is, to a new CLEC
8. Resale to UNE-P Conversion as specified, to a new CLEC
9. UNE-P to Resale Conversion as is, to a new CLEC
10. UNE-P to Resale Conversion as is, to a new CLEC
11. Qwest Retail to Resale / UNE-P Conversion as is
12. Qwest Retail to Resale / UNE-P Conversion as specified
13. Qwest Retail to Resale / UNE-P Conversion with move via single

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DOCKET NO. T-03406A-06-0257
DOCKET NO. T-01051B-06-0257
Qwest Corporation
Exhibits of Renée Albersheim
Exhibit RA-1

LSR process

Decision Chart, Scenario's 1-5, Same CLEC		
IF	**AND**	**THEN**
Conversion, Migration and/or Move Service Order has completed	You want full or partial restoral of previous service	• Issue Restoral Request LSR as appropriate based on order scenario and order completion, such as a New Connect, Change or Conversion with or without move, Transfer of Service or Disconnect • Follow expedite procedures

Decision Chart, Scenario's 6-10, To a New CLEC		
IF	**AND**	**THEN**
Conversion, Migration and/or Move Service Order has completed	You want full or partial restoral of previous service	• Either the end-user, or the new CLEC and the end-user must contact the old CLEC's Customer Contact Center and request that the end-user's service be re-established as previously provisioned for the old CLEC on Resale or UNE-P service • Old CLEC must follow expedite procedures • Old CLEC will issue Restoral Request LSR as appropriate based on order scenario and order completion, such as a New Connect, Change or Conversion with or without move • New CLEC must follow expedite procedures • New CLEC will issue Disconnect LSR if required based on order scenario and order completion • Old and new CLECs will coordinate their order activity • Contact your Qwest Service Manager if you require assistance with old CLEC contact

Decision Chart, Scenario's 11-13, Conversion from Qwest Retail to New CLEC		
IF	**AND**	**THEN**

Conversion, Migration and/or Move Service Order has Completed	You want full or partial restoral of previous service	• Contact the CSIE Center at 866-434-2555 • Open an Escalation ticket • Request a warm transfer to the CSIE Tier 1 support group • Place a verbal Restoral Request for Previous Retail Service, full or partial restoral • CSIE will advise you if a new LSR will need to be issued by you • If a new LSR is needed and is not issued within 2 business hours, the escalation ticket will be closed. If this occurs, the CLEC must start the expedite process again once the LSR has been issued as directed.

Escalations

Escalations are a request for status or intervention around a missed critical date such as:

- Plant Test Date (PTD)
- Due Date (DD)
- Ready For Service (RFS)

Qwest's Service Centers pro-actively escalate any critical dates in jeopardy and will notify you. If, however, you find it necessary to initiate an escalation, call the assigned Qwest Wholesale Center Representative at one of the numbers listed in the Expedites section for assistance. Regardless of how initiated, by you or internally, Qwest escalation roles and responsibilities can be summarized as:

- Qwest Wholesale Center Representatives
  Local Service Request (LSR) or Access Service Request (ASR) escalations related to Rejects/Delayed orders, critical dates and Firm Order Confirmations (FOC).
- Qwest Service Manager
  Involved only after normal processes fail to resolve the escalation to your satisfaction. Evaluates the situation based on commitments managing associated resolution activities.
- Qwest Senior Service Manager/Director
  Involved only when the Service Manager's efforts are unsuccessful. Provides direction to those working the issue, partnering with Center Coaches and Team leaders.
- Qwest Senior Director/Vice President
  Contacted for direction and/or assistance for those working the escalation, providing timely status updates back to the prior level and you directly.

Escalations - Maintenance and Repair
At your discretion, you may initiate an escalation of your trouble report through our electronic interface Customer Electronic Maintenance and Repair (CEMR) or by calling either the Qwest Wholesale Repair Center for Unbundled Network Elements (UNEs) and Complex services or the Repair

Arizona Corporation Commission
DOCKET NO. T-03406A-06-0257
DOCKET NO. T-01051B-06-0257
Qwest Corporation
Exhibits of Renée Albersheim
Exhibit RA-1

Call Handling Center (RCHC) for Plain Old Telephone Service (POTS) and Non-Complex services. Refer to our Maintenance and Repair Overview for additional information. You will be referred to Held, Escalated & Expedited Tool (HEET) for ongoing status if your service was requested on an ASR.

Escalations - Technical Escalation Process
Additional information about the Technical Escalation Process can be obtained from Qwest's Operations Support Systems General Information.

Note: Occasionally, your end-user may find their way to the Qwest Wholesale Center or Qwest Service Manager and our Wholesale Center Representatives will explain that you are our customer and direct them to you for assistance.

Should you have questions, or need additional information related to the expedite or escalation processes defined above, contact your Qwest Service Manager for assistance.

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Training

Local Qwest 101 "Doing Business with Qwest"

- This introductory web-based training course is designed to teach the Local CLEC and Local Reseller how to do business with Qwest. It will provide a general overview of products and services, Qwest billing and support systems, processes for submitting service requests, reports, and web resource access information. Click here to learn more about this course and to register.

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Contacts

Qwest contact information is located in Wholesale Customer Contacts

Expedites and Escalations

- Local Service Requests (LSRs)

Wholesale Center			
Tier	Responsibility	Activity	Contacts
Tier 1	Customer Service Inquiry and Education Center (CSIE)	First point of contact for CLECs	866-434-2555
Tier 2	Subject Matter Expert (SME), Team Leaders, Team Coaches	Respond to issues not resolved at Tier 1	800-366-9974

Tier 3	Appropriate Qwest Service Manager	Respond to issues not resolved at Tier 2	Service Manager

A call center ticket is opened on every call into the CSIE Center. Upon resolution of the ticket a close code is assigned to the ticket. Upon request the close code is provided to you. Should you disagree with the codes used to close the ticket you will use the escalation process. For a list of the close codes used at the CSIE level see the Call Center Database Ticket Reports section of the Ordering Overview PCAT.

- Access Service Requests (ASRs)

Products & Services	Contacts	Fax
All	800-244-1271	800-335-5680

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Frequently Asked Questions (FAQs)

This section is currently being compiled based on your feedback.

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Last Update: July 24, 2006

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Qwest Wholesale Change Management Process Document –01-30-06

History Log

Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
1	Master Redlined CLEC-Qwest CMP Re-design Framework - Revised 02-07-02 – CLEAN – Version 1.0	02-07-02	All			Accepted changes to Master Redlined CLEC-Qwest CMP Redesign Framework
2	Master Redlined CLEC-Qwest CMP Re-design Framework - Revised 02-20-02 – CLEAN – Version 2.0	02-20-02	2.1	Types of Change	Regulatory Change	Added changes to Regulatory Changes section as agreed to at Feb 19 Redesign Meeting.
3	MasterRedlineCLEAN030702	03-11-02	3.1	Change Request Initiation Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added language agreed to at March 7 Redesign Meeting.
4			9.0	Prioritization	N/A	Added language agreed to at March 7 Redesign Meeting.
5			9.3	Prioritization	SCRP	Added language agreed to at March 7 Redesign Meeting.
6			5.1.6	Change to Existing Interfaces	Final Interface Technical Specifications	Added language agreed to at March 7 Redesign Meeting.
7	MasterRedlineCLEAN032702	03-27-02	3.1	Change Request Initiation Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added Reasons for Denial Language
8			3.3	Change Request Initiation Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added Reasons for Denial Language
9	MasterRedlineCLEAN040802	04-08-02	1.0	Introduction and Scope		Added language agreed to at April 4 Redesign Meeting.
10			2.0	Managing The CMP		Added language agreed to at April 4 Redesign Meeting. Moved Section to 2.0 from 7.0

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Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
11			3.0	Meetings		Moved section to 3.0 from 8.0.
12			6.0	OSS Interface Release Calendar		Added language agreed to at April 4 Redesign Meeting.
13			10.0	Prioritization		Moved Appendices to end of document
14			10.2.4	Prioritization	Late Adder	Added language agreed to at April 4 Redesign Meeting.
15	MasterRedlineCLEAN041602b	04-16-02	5.4	Change Request Initiation Process	Qwest Originated Product/Process Changes	Added language agreed to at April 16 Redesign Meeting.
16	MasterRedlineCLEAN050202	05-02-02	5.1	Change Request Process	CLEC-Qwest OSS Interface Change Request Initiation Process	Added revised language agreed to at May 2. 2002 Redesign Meeting.
17			5.5	Change Request Process	Crossover Change Requests	Added revised language agreed to at May 2. 2002 Redesign Meeting.
18			10.2.5	Prioritization	Withdrawal of Prioritized CRs	Added language agreed to at May 2. 2002 Redesign Meeting.
19			10.3	Prioritization	SCRP	Added revised language agreed to at May 2. 2002 Redesign Meeting.
20			13.0	Training	N/A	Added language agreed to at May 2. 2002 Redesign Meeting.
21	MasterRedlineCLEAN052202a	05-22-02	5.6	Change Request Process	Change Request Status Codes	Added language agreed to at May 21-22. 2002 Redesign Meeting.
22			5.7	Change Request Process	Change Request Suffixes	Added language agreed to at May 21-22. 2002 Redesign Meeting.
23	MasterRedlineCLEAN060602	06-06-02	2.5	Managing the Change Management Process	Method of Communication	Added language agreed to at June 5-6, 2002 Redesign Meeting.
24			5.1	Change Request Process	CR Initiation Process	Added language agreed to at June 5-6, 2002 Redesign Meeting.
25			5.3	Change Request Process	CLEC Product/Process Change Request Initiation	Added language agreed to at June 5-6, 2002 Redesign Meeting.

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Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
					Process	
26			5.3	Change Request Process	CLEC Product/Process Change Request Initiation Process	Added IMA Software Development Timeline agreed to at June 5-6, 2002 Redesign Meeting.
27			5.5	Change Request Process	Postponement and Arbitration of a Product/Process Change	Added language agreed to at June 5-6, 2002 Redesign Meeting.
28			5.6, 5.7, and 5.8	Change Request Process	Multiple	Renumbered based on addition of new Section 5.5
29			16.0	Exception Process		Added language agreed to at June 5-6, 2002 Redesign Meeting.
30			Definition of Terms	Definition of Terms		Added language agreed to at June 5-6, 2002 Redesign Meeting.
31			All	All	All	Cosmetic and clarifying changes agreed to at June 5-6, 2002 Redesign Meeting.
32	MasterRedlineCLEAN061802	06-18-02	2.1	Managing the Change Management Process	Managing the Change Management Process Document	Added language agreed to at June 17-18, 2002 Redesign Meeting.
33			12.4	Production Support	Reporting Trouble to IT	Added language agreed to at June 17-18, 2002 Redesign Meeting.
34			12.5	Production Support	Severity Levels	Made changes at June 17-18, 2002 Redesign Meeting.
35			12.8	Production Support	Process Production Support	Added language agreed to at June 17-18, 2002 Redesign Meeting.
37	MasterRedlinedCLEAN071002	07-10-02	2.2	Managing the Change Management Process	Change Management Point of Contact (POC)	Added language agreed to at July 10, 2002 Redesign Meeting.
38			2.3	Managing the Change Management Process	Change Management Point of Contact (POC) List	Added language agreed to at July 10, 2002 Redesign Meeting.

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Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
39			17.0	Voting	n/a	Added language agreed to at July 10, 2002 Redesign Meeting.
40			All	All	All	Cosmetic and clarifying changes agreed to at July 10, 2002 Redesign Meeting.
41	MasterRedlinedCLEAN072302	07-23-02	10.0	Prioritization		Revised language agreed to at July 23, 2002 Redesign Meeting.
42			10.1	Prioritization	Test Environment Releases	Added language agreed to at July 23, 2002 Redesign Meeting.
43			All	All	All	Cosmetic and clarifying changes agreed to at July 23, 2002 Redesign Meeting.
44	MasterRedlinedCLEAN072602	07-26-02	1.0	Introduction and Scope		Revised language agreed to at July 26, 2002 Redesign Meeting.
45			2.4.4	Managing the Change Management Process	Implementation Obligations	Added language agreed to at July 26, 2002 Redesign Meeting.
46			5.6	Change Request Process	Comparability of Change Request Treatment	Added language agreed to at July 26, 2002 Redesign Meeting.
47			10.1	Prioritization	Test Environment Releases	Revised language agreed to at July 26, 2002 Redesign Meeting.
48	QwestWhslChgMgtDoc091302	09-13-02	All			Accepted all agreed to CLEAN-UP changes and additions from multiple Redesign Meetings.
49			2.1	Managing the Change Management Process	Managing the Change Management Process Document	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
50			2.4.4	Managing the Change Management Process	Implementation Obligations	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
51			2.4.5	Managing the Change Management	Adherence to this CMP	Added language agreed to at multiple CLEAN-UP Redesign Meetings.

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Qwest Wholesale Change Management Process Document –01-30-06

Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
				Process		
52			2.5	Managing the Change Management Process	Method of Communication	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
53			3.0	Meetings		Added language agreed to at multiple CLEAN-UP Redesign Meetings.
54			5.1.2	Change Request Process	Implementation of Industry Guideline CRs	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
55			5.6	Managing the Change Management Process	Comparability of Change Request Treatment	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
56			16.2	Exception Process	Emergency Call/Meeting Notice to Discuss Exception Request	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
57			16.3	Exception Process	Notice of Exception Request Discussion and Vote at Upcoming CMP Meeting	Added language agreed to at multiple CLEAN-UP Redesign Meetings.
58			18.0	Oversight Review Process		Added language agreed to at multiple CLEAN-UP Redesign Meetings.
59	QwestWhslChgMgtDoc100902	10-09-02	All			Added language and accepted CLEAN-UP changes and additions from 10-08-02 and 10-09-02 Redesign Meetings.
60	QwestWhslChgMgtDoc101502	10-15-02	17.0			Added language proposed by AT&T and accepted by Qwest and WorldCom on 10-15-02.
61	QwestWhslChgMgtDoc010603	01-06-03	12.0	Production Support	Request for a Production Support Change	Modified language as approved by unanimous CMP vote at December 18, 2002, Monthly CMP Product/Process Meeting
62			5.0	Change Request Process	Level 1 Process/Deliverables	Modified language as approved by unanimous CMP vote at December 18, 2002, Monthly CMP Product/Process Meeting

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Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
63			5.0	Change Request Process	Level 2 Process/Deliverables	Modified language as approved by unanimous CMP vote at December 18, 2002, Monthly CMP Product/Process Meeting
64			5.0	Change Request Process	Level 3 Process/Deliverables	Modified language as approved by unanimous CMP vote at December 18, 2002, Monthly CMP Product/Process Meeting
65			5.0	Change Request Process	Level 4 Process/Deliverables	Modified language as approved by unanimous CMP vote at December 18, 2002, Monthly CMP Product/Process Meeting
66	QwestWhslChgMgtDoc053003	05-30-03	8.0	Change to an Existing OSS Interface		Modified language as approved by unanimous CMP vote at May 27, 2003, Ad Hoc CMP Product/Process Meeting
67	QwestWhslChgMgtDoc061803	06-18-03	5.0	Change Request Process	Systems Change Request Origination Process	Modified language as approved by unanimous CMP vote at the June 18, 2003, CMP Product/Process Meeting
68	QwestWhslChgMgtDoc121103	12-11-03	5.1.4, 10.3.1, 10.4	Change Request Process, Prioritization	Systems Change Request Origination Process, Prioritization Review, Special Change Request Process	Modified language as approved by unanimous CMP vote at September 17, 2003, CMP Product/Process Meeting
69	QwestWhslChgMgtDoc041904	04-19-04	3.0	Change Management Process Meetings		Added language agreed to at the January 2004 CMP Product/Process Meeting
			12.4 12.5	Production Support	Reporting Trouble to IT Severity Levels	Added language agreed to at the January 2004 CMP Product/Process Meeting
			12.7	Production Support	Notification Intervals	Added language agreed to at the January 2004 CMP Product/Process Meeting
			12.3	Production Support	Request for a Production Support Change	Added language around making a software patch or event notification or initiate a meeting to discuss the patch
70	QwestWhslChgMgtDoc022105	02-21-05	5.1.4	Change Request Process	Systems Change Request Origination Process	Added language agreed to at the December 2004 CMP Product/Process Meeting

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Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
			5.2.5	Change Request Process	Code & Test	Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.0	Change to an Existing OSS Interface		Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.1.1	Change to an Existing OSS Interface	Draft Interface Technical Specifications	Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.1.2	Change to an Existing OSS Interface	Walk Through of Draft Interface Technical Specifications	Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.1.3	Change to an Existing OSS Interface	**CLEC Comments on Draft Interface Technical Specifications**	Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.1.4	Change to an Existing OSS Interface	Qwest Response to CLEC Comments	Added language agreed to at the December 2004 CMP Product/Process Meeting
			8.1.5	Change to an Existing OSS Interface	Final Interface Technical Specifications	Added language agreed to at the December 2004 CMP Product/Process Meeting
			10.1	Prioritization	Test Environment Releases	Added language agreed to at the December 2004 CMP Product/Process Meeting
71	QwestWhslChgMgtDoc030305	03-03-05	Table of Contents			Modified Appendix D entry to relay most current effective date on Sample CR Form
			Appendix D	Sample Change Request Form – As Of 03/03/05		Updated Appendix D – Sample Change Request Form with most current approved document as agreed to in January 2005 CMP Product/Process Meeting
72	QwestWhslChgMgtDoc032805	03-28-05	3.0	Change Management		Added language agreed to at the March 2005 CMP Product/Process Meeting

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Line #	Version - Filename	Effective Date	Change			
			Section #	Section Name	Subsection Name	Update Activity
				Process Meetings		
73	QwestWhslChgMgtDoc091305	09-13-05	11.0	Application-to-Application Interface Testing		Remove reference to interoperability testing environment.
			Definition of Terms	Definition of Terms	Design, Development, Notification, Testing, Implementation and Disposition	Remove reference to interoperability testing environment in both the Term and Definition portion.
74	QwestWhslChgMgtDoc110805	11-08-05	5.8	Change Request Process	Change Request Status Codes	Modified wording on when a CR is moved to CLEC test (See CR 072705-1CM)
75	QwestWhslChgMgtDoc013006	01-30-06	14.2	Escalation Process	Cycle	Added language to change the Escalation Process when a meeting is held to discuss the escalation. Qwest will also respond to the originating CLEC and copy the participating CLECs with the binding position via email.

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Qwest Wholesale Change Management Process Document -

CHANGE MANAGEMENT PROCESS (CMP) FOR LOCAL SERVICES

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CHANGE MANAGEMENT PROCESS (CMP)

1.0 INTRODUCTION AND SCOPE

This document defines the processes for change management of Operations Support Systems (OSS) Interfaces, products and processes (including manual) as described below. CMP provides a means to address changes that support or affect pre-ordering, ordering/provisioning, maintenance/repair and billing capabilities and associated documentation and production support issues for local services (local exchange services) provided by Competitive Local Exchange Carriers (CLECs) to their end users. This CMP is applicable to Qwest's 14 state in-region serving territory.

This CMP is managed by CLEC and Qwest Points of Contact (POCs) each having distinct roles and responsibilities. The CLECs and Qwest will hold regular meetings to exchange information about the status of existing changes, the need for new changes, what changes Qwest is proposing, how the process is working, etc. The process also allows for escalation to resolve disputes, if necessary.

Qwest will track changes to OSS Interfaces, products and processes. This CMP includes the identification of changes and encompasses, as applicable, Design, Development, Notification, Testing, Implementation, Disposition of changes, etc. (See Change Request Status Codes, Section 5.8). Qwest will process any such changes in accordance with this CMP.

In cases of conflict between the changes implemented through this CMP and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement. In addition, if changes implemented through this CMP do not necessarily present a direct conflict with a CLEC interconnection agreement, but would abridge or expand the rights of a party to such agreement, the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such agreement.

This CMP is dynamic in nature and, as such, is managed through the regularly scheduled meetings. The parties agree to act in Good Faith in exercising their rights and performing their obligations pursuant to this CMP. This document may be revised through the procedures described in Section 2.0.

Any opinions expressed at the CMP meetings by representatives of government agencies such as state Public Utilities Commissions (PUC), Federal Communications Commission (FCC), and the Department of Justice (DOJ) do not bind such government agencies.

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Throughout this CMP document, terms such as "agreement" or "consensus" are used to identify instances when participants attempt to informally arrive at a unanimous decision by the CMP group at a noticed CMP Meeting. At any time, when the parties cannot informally reach a decision, the parties may continue to work together to reach resolution or conduct a vote in accordance with Section 17.0.

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2.0 MANAGING THE CHANGE MANAGEMENT PROCESS

2.1 Managing the Change Management Process Document

Proposed modifications to this CMP framework shall be originated by a change request submitted by CLEC or Qwest in accordance with Section 5.0. Acceptance of such changes will be discussed at a regularly scheduled Monthly CMP Product/Process Meeting.

The originator of the change will send proposed redlined language and the reasons for the request with the change request at least fourteen (14) days in advance of the Monthly CMP Product/Process Meeting. The request originator will present the proposal to the CMP participants. The parties will develop a process for input into the proposed change including when the vote will be taken. Incorporating a change into this CMP requires unanimous agreement using the Voting Process, as described in Section 17.0. Each CMP change request will be assigned a CR number that contains a suffix of "CM" and will be included in the Monthly CMP Product/Process Meeting distribution package. The CMP change request and redlined language will be included in the Monthly CMP Product/Process Meeting distribution package and the CMP change request will be identified as a proposed change to the CMP framework on the agenda. The requested change will be reviewed at a Monthly CMP Product/Process Meeting and voted on no earlier than the following CMP Product/Process meeting. The agenda for the Monthly CMP Product/Process Meeting, at which the vote will be taken, will indicate that a vote will be taken.

There will be a standing agenda item for each monthly CMP Meeting for discussion about issues relating to the operation and effectiveness of CMP. This discussion is intended to be open and receptive to all input with the goal of constantly evaluating and improving this CMP.

2.2 Change Management Point-of-Contact (POC)

Qwest and each CLEC will designate primary, secondary, and, if desired, tertiary change management POC(s), who will serve as the official designees for matters regarding this CMP. CLECs and Qwest will exchange primary, secondary and tertiary POC information including items such as:

- Name
- Title
- Company
- Telephone number
- E-mail address
- Fax number

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- Cell phone/Pager number
- POC designation (e.g., primary, secondary, or tertiary)

2.3 Change Management POC List

Primary, secondary and tertiary CLEC and Qwest POCs will be included in the Qwest maintained POC list. It is the CLEC POC's responsibility to notify Qwest of any POC changes at http://www.qwest.com/wholesale/cmp/ppform.html. If Qwest makes a Primary POC change it will follow the process as described in Section 5.4.3. The list will be posted on the Qwest CMP Web site and may include other contacts.

2.4 Qwest CMP Responsibilities

2.4.1 CMP Manager

The Qwest CMP Manager is the Qwest Product/Process POC and is responsible for properly processing submitted CRs, conducting the Monthly CMP Product/Process Meeting, assembling and distributing the meeting distribution package, and ensuring minutes are written and distributed in accordance with the agreed-upon timeline.

The Qwest CMP Manager is the Qwest Systems POC and is responsible for properly processing submitted CRs, conducting the Monthly CMP Systems Meeting, assembling and distributing the meeting distribution package, and ensuring minutes are written and distributed in accordance with the agreed-upon timeline. The CMP Manager also distributes the list of CRs eligible for prioritization to Qwest and the CLECs for ranking, tabulates the rankings, and forwards the resulting prioritization of the CRs to Qwest and the CLECs. In addition, the CMP Manager is responsible for coordinating the publication of the Qwest OSS Interface Release Calendar, as described in Section 6.0.

2.4.2 Change Request Project Manager (CRPM)

The Qwest CRPM manages CRs throughout the CMP CR lifecycle. The CRPM is responsible for obtaining a clear understanding of exactly what deliverables the CR originator requires to close the CR, arranging the CR clarification meetings and coordinating necessary Subject Matter Experts (SMEs) from within Qwest to respond to the CR, and coordinating the participation of the necessary SMEs in the discussions with the CLECs.

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2.4.3 Escalation/Dispute Resolution Manager

The Escalation/Dispute Resolution Manager is responsible for managing escalations, disputes and postponements in accordance with the CMP Escalation, Dispute Resolution and Postponement Processes. (See Sections 14.0, 15.0 and 5.5)

2.4.4 Implementation Obligations

When Qwest commits to make a change pursuant to CMP, Qwest will review and revise internal and external documentation, as needed, to ensure that the change is appropriately reflected. Qwest will conduct training to communicate the changes to all appropriate Qwest personnel so that they are made aware of relevant changes. If Sections 5.0, 7.0, 8.0 or 9.0 require notification of the change, such notification will be provided in accordance with that section and will include references to external Qwest documentation that will be modified to reflect the change, if applicable. All of the forgoing activities will take place by the implementation date of the change.

2.4.5 Adherence to this CMP

As a general rule, if a CLEC indicates that Qwest is not following this CMP, and Qwest agrees, Qwest will correct the situation by following the process. If Qwest has failed to follow this CMP for a particular change, and is not able to withdraw the change and follow the applicable process, then Qwest and CLECs must unanimously agree on a different manner to correct the situation. If Qwest and the CLECs attempt to, but do not agree that a process was not followed or cannot agree on a manner to correct the situation, any CLEC may pursue any appropriate process available in this CMP (e.g., production support, escalation, dispute resolution, oversight committee).

2.5 Method of Communication

The method of communication is e-mail with supporting information posted to the Web site when applicable (see Section 3.3 Qwest Wholesale CMP Web Site). Communications sent by e-mail resulting from CMP will include in the subject line "CMP". E-mail communications regarding document changes will include direct Web site links to the related documentation. All Notifications are sent as "mailouts" and are distributed to all those who subscribe to such notifications at http://www.qwest.com/wholesale/notices/cnla/maillist.html.

Redlined PCATs and Technical Publications associated with product, process, and systems changes will be posted to the Qwest CMP Document Review Web site, http://www.qwest.com/wholesale/cmp/review.html. For the duration of the agreed upon

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comment period as specified in this CMP, CLECs may submit comments on the proposed documentation change. At the Qwest CMP Document Review Web site, CLECs may submit their comments on a specific document by selecting the "Submit Comments" link associated with the document. The "Submit Comments" link will take CLECs to an HTML comment template. If for any reason the "Submit" button on the site does not function properly, CLECs may submit comments to cmpcomm@qwest.com. After the conclusion of the applicable CLEC comment period, Qwest will aggregate all CLEC comments with Qwest responses and distribute to all CLECs via Notification e-mail within the applicable period.

In some instances, a CLEC or Qwest may wish to include proprietary information in a CR. To do this the CLEC or Qwest must identify the proprietary information with bracketed text, in all capitals, preceded and followed by the words "PROPRIETARY BEGIN" and "PROPRIETARY END," respectively. Qwest will blackout properly formatted proprietary information when the CR is posted to the CR Database and distributed in the CMP Monthly Meeting distribution packet.

If a CLEC or Qwest wishes to ask a question, submit a comment, or provide information that is of a proprietary nature, the CLEC or Qwest must communicate directly with the CMP Manager via e-mail, cmpcr@qwest.com. Such e-mails must have a subject line beginning with PROPRIETARY.

This CMP contains references to required notifications. Such references typically identify specific information that must be included in such notifications. Such information is not an exclusive list. Qwest will use reasonable efforts to include such other information in its possession that may be useful in aiding CLECs to understand the scope and purpose of the notification.

2.6 CMP Relationship with Management of Performance Indicator Definitions (PIDs)

Qwest Performance Indicator Definitions (PIDs) have been established through collaboration among Qwest, CLECs and state public utilities commissions in a forum known as the Regional Oversight Committee Technical Advisory Group (ROC TAG). This activity was performed in order to test Qwest's performance in connection with Qwest's application to obtain approval under Section 271 of the Telecommunications Act of 1996. The parties anticipate that the ROC TAG (or similar industry group separate from the CMP body) will continue in some form after approval of Qwest's Section 271 application. The parties expect that this industry group will be responsible for change management of the Qwest PIDs (the "PID Administration Group").

The parties acknowledge that the operation of PIDs may be impacted by changes to Qwest OSS Interfaces, products or processes that are within the scope of CMP. Conversely, Qwest

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OSS Interfaces, products or processes may be impacted by changes to, or the operation of, PIDs that are within the scope of the PID Administration Group. As a result, efficient operation of this CMP requires communication and coordination, including the establishment of processes, between the PID Administration Group and the CMP body.

The parties recognize that if an issue results from CMP that relates to the PIDs (e.g., Qwest denies a CR with reference to PIDs, discussion of PID administration is needed in order to implement a CR, etc.), any party to this CMP may take the issue to the PID Administration Group for discussion and resolution as appropriate under the procedures for that Group. At the time any party brings such an issue to the PID Administration Group, such party shall notify Qwest and Qwest will distribute an e-mail notification to the CMP body. Qwest shall also distribute to the CMP body all correspondence with the PID Administration Group relating to the issue at the time such correspondence is exchanged with the PID Administration Group (if Qwest is not copied on such correspondence, the involved CLEC will forward such correspondence to Qwest for distribution to the CMP body). Qwest or an interested CLEC will bring any resolution or recommendation from the PID Administration Group relating to such issues to the CMP body for consideration in resolving related CMP issues.

It is possible that the PID Administration Group will identify issues that relate to CMP. In that case, the CMP body would expect the PID Administration Group (or a party from that group) to bring such issues to the CMP body for resolution or a recommendation. Such issues may be raised in the form of a CR, but may be raised in a different manner if appropriate. Qwest or an interested CLEC will return to the PID Administration Group any resolution or recommendation from the CMP body on such issues. Qwest and CLECs participating in the PID Administration Group agree that they will propose, develop, and adopt processes for the PID Administration Group that will enable the coordination called for in this Section. One such process may include joint meetings, on an as needed basis, of the PID Administration Group and the CMP body to address issues that affect both groups.

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3.0 CHANGE MANAGEMENT PROCESS MEETINGS

Change Management Process meetings will be conducted on a regularly scheduled basis. The CMP Product/Process and Systems Meetings will be conducted on the same day of each month or on at least two (2) consecutive days on a monthly basis, unless other arrangements are agreed upon by the CLECs and Qwest. Meeting participants can choose to attend meetings in person or participate by conference call.

Meetings are held to review, manage the implementation of Product/Process and System changes, and address Change Requests. Qwest will review the status of all applicable Change Requests. The meeting may also include discussions of Qwest's OSS Interface Release Calendar.

CLEC's request for additional agenda items and associated materials must be submitted to Qwest at least five (5) business days by noon (MT) in advance of the meeting. Qwest is responsible for distributing the agenda and associated meeting materials and will be responsible for preparing, maintaining, and distributing meeting minutes. Attendees with any walk-on items should bring hard copy materials of the walk-on items to the meeting and should, at least two (2) hours prior to the meeting, provide copies of such materials electronically (soft copy) to the CMP Manager, cmpcr@qwest.com, for distribution to all parties.

All attendees, whether in person or by phone, must identify themselves and the company they represent.

Additional meetings may be held at the request of Qwest or any CLEC. Meeting notification must contain an agenda plus any supporting meeting materials. Notification for these meetings will be distributed at least five (5) business days prior to their occurrence. Qwest will record and distribute meeting minutes, unless otherwise noted in this CMP.

3.1 Meeting Materials (Distribution Package) for Monthly Change Management Process Meetings

Meeting materials will include the following information:

- Meeting Logistics
- Minutes from previous meeting
- Agenda
- Change Requests and responses, as applicable
  - New/Active
  - Updated

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- Issues, Action Items Log and associated statuses
- Release Summary, as applicable
- OSS Interface Release Calendar, as described in Section 6.0
- Date TBD Trouble Tickets, as described in Section 12.3
- Any other material to be discussed

Qwest will provide Meeting Materials (distribution package) electronically, by noon (MT), three (3) business days prior to the Monthly CMP Meeting. In addition, Qwest will provide hard copies of the distribution package at the Monthly CMP Meeting.

3.2 Meeting Minutes for Change Management Process Meetings

Qwest will take minutes. Qwest will summarize discussions in meeting minutes and include any revised documents such as issues, action items and statuses.

Minutes will be distributed to meeting participants for comments or revisions no later than five (5) business days by noon (MT) after the meeting. CLEC comments will be provided by noon (MT) two (2) business days after receiving draft minutes to the Qwest CMP Manager, cmpcr@qwest.com. Revised minutes, if CLEC comments are received, will be posted to the CMP Web site within nine (9) business days by noon (MT) after the meeting.

3.3 Qwest Wholesale CMP Web Site

To facilitate access to CMP documentation, Qwest will maintain CMP information on its Web site. The Web site should be easy to use and will be updated in a timely manner. The Web site will be a well organized central repository for CLEC notifications and CMP documentation. Active documentation, including meeting materials (distribution package), will be maintained on the Web site. Change Requests and notifications will be identified in accordance with the agreed upon naming conventions to facilitate ease of identification. Qwest will maintain closed and old versions of documents on the Web site's Archive page for 18 months before storing off line. Information that has been removed from the Web site can be obtained by contacting the Qwest CMP Manager, cmpcr@qwest.com. At a minimum, the CMP Web site will include:

- Current version of the Qwest Wholesale Change Management Process Document
- OSS Interface Release Calendar
- OSS Interface hours of availability
- Links to related Web sites, such as IMA EDI, IMA GUI, CEMR, Document Review and Notifications
- Change Request Form and instructions to complete form
- Submitted and open Change Requests and the status of each, including written responses to CLEC inquiries

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- Meeting (formal and informal) information for Monthly CMP Meetings and interim meetings or conference calls, including descriptions of meetings and participants, agendas, minutes, sign-up forms, and schedules, if applicable
- Interactive CR Report
- Meeting materials (distribution package)
- CLEC Notifications and associated requirements
- Directory to CLEC Notifications for the month
- Business rules, SATE test case scenarios Technical Specifications, and user guides will be provided via links on the CMP Web site
- Contact information for the CMP POC list, including CLEC, Qwest and other participants (with participant consent to publish contact information on Web page).
- Redlined PCAT and Technical Publications - see Section 2.5
- Instructions for receiving CMP communications – see Section 2.5

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4.0 TYPES OF CHANGE

A Change Request must be within the scope of CMP and will fall into one of the following classifications. Types of Changes apply to Systems and Product/Process.

4.1 Regulatory Change

A Regulatory Change is mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. Either the CLEC or Qwest may originate the Change Request.

4.2 Industry Guideline Change

An Industry Guideline Change implements Industry Guidelines. Either Qwest or the CLEC may originate the Change Request and these changes are subject to the same processes under this CMP as Qwest and CLEC Originated Changes. These industry guidelines are defined by:

- Alliance for Telecommunications Industry Solutions (ATIS) sponsored
- Ordering and Billing Forum (OBF)
- Local Service Ordering and Provisioning Committee (LSOP)
- Telecommunications Industry Forum (TCIF)
- Electronic Commerce Inter-exchange Committee (ECIC)
- Electronic Data Interchange Committee (EDI)
- American National Standards Institute (ANSI)

4.3 Qwest Originated Change

A Qwest Originated Change is originated by Qwest and does not fall within the changes listed above.

4.4 CLEC Originated Change

A CLEC Originated Change is originated by the CLEC and does not fall within the changes listed above.

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5.0 CHANGE REQUEST PROCESS

5.1 CLEC-Qwest OSS Interface Change Request Process

A CLEC or Qwest seeking to change an existing OSS Interface, to establish a new OSS Interface, or to retire an existing OSS Interface must submit a Change Request (CR). A Change Request originator will complete and e-mail a completed Change Request (CR) Form to the Qwest CMP Manager, cmpcr@qwest.com, in accordance with the instructions set forth in the Qwest Wholesale CMP Web site located at the following URL: http://www.qwest.com/wholesale/cmp/index.html.

The CR Process supports Regulatory, Industry Guideline, CLEC originated and Qwest originated changes. The process for Regulatory changes will be managed as described in Section 5.1.1, Section 5.1.2 and Section 5.1.3.

5.1.1 Regulatory Change Request

Qwest or any CLEC may submit Regulatory CRs. The party submitting a Regulatory CR must also include sufficient information to justify the CR being treated as a Regulatory CR in the Description of Change section of the CR Form. Such information must include specific references to regulatory or court orders or legislation as well as dates, docket or case numbers, page or paragraph numbers and the mandatory or recommended implementation dates, if any. All Regulatory CRs initially must be submitted as systems CRs, including when the Regulatory CR clearly is for a product/process change, and will be introduced at the Monthly CMP Systems Meeting. If the Regulatory CR originator seeks to establish that the CR should be implemented by a manual process, the originator must so indicate on the CR Form and include as much information supporting the application of the exception as practicable.

Qwest will send CLECs a notification when it posts Regulatory CRs to the Web site and identify when comments are due and when a vote is to be taken, as described below. Regulatory CRs will also be identified in the Monthly CMP Systems Meeting distribution package.

Not later than eight (8) business days prior to the Monthly CMP Systems Meeting, any party objecting to the classification of such CR as Regulatory must submit a statement to the CMP Manager, cmpcr@qwest.com, documenting reasons why the objecting party does not agree that the CR should be classified as a Regulatory change. Regulatory CRs may not be presented as walk-on items.

If Qwest or any CLEC has objected to the classification of a CR as Regulatory, that CR will be discussed at the next Monthly CMP Systems Meeting. At that meeting, Qwest and the CLECs

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will conduct a vote under Section 17.0 to determine whether there is unanimous agreement that the CR is a Regulatory change. If Qwest or any CLEC does not agree that the CR is Regulatory, the CR will be treated as a non-Regulatory CR and prioritized, if applicable, with the CLEC originated and Qwest originated CRs, unless and until the CR is declared to be Regulatory through the Dispute Resolution Process. (See Section 15.0) Final determination of CR type will be made by the CLEC and Qwest POCs at that Monthly CMP Systems Meeting, and documented in the meeting minutes.

5.1.2 Implementation of Regulatory CRs

As a general rule, a Regulatory Change will be implemented by mechanization unless all parties agree otherwise, as described below.

For each Regulatory CR, Qwest will provide a cost analysis for both a manual and a mechanized solution. The cost analyses will include a description of the work to be performed and any underlying estimates that Qwest has performed associated with those costs. Qwest will also provide an estimated Level of Effort expressed in terms of person hours required for the mechanized solution. The cost analyses will be based on factors considered by Qwest, which may include volume, number of CLECs, technical feasibility, parity with retail, or effectiveness/ feasibility of a manual process.

The Regulatory CR will be implemented by a manual solution if there is a Majority vote, as described in Section 17.0, at the Monthly CMP Systems Meeting in favor of one of the following exceptions.

A. The mechanized solution is not technically feasible.

or

B. There is a significant difference in the costs for the manual and mechanized solutions. Cost estimates will allow for direct comparisons between solutions using comparable methodologies and time periods.

Any party that desires to present information to establish an exception may do so at the Monthly Systems CMP Meeting when the implementation plan is presented.

Once a Regulatory CR has been agreed upon to be implemented by a manual solution, the CR will be, from that point forward, tracked as a product/process CR through the Monthly CMP Product/Process Meetings. (See Section 5.7)

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If Qwest is unable to fully implement a mechanized solution in the first Release that occurs after the CMP participants agree that a change is a Regulatory CR, Qwest's implementation plan for the mechanized solution may include the short-term implementation of a manual work-around until the mechanized solution can be implemented. In that situation, a single systems Regulatory CR will be used for the implementation of both the manual and mechanized changes. Qwest will continue to work that Regulatory CR until the mechanized solution is implemented.

If a Regulatory CR is implemented by a manual process and later it is determined that a change in circumstance warrants a mechanized solution, Qwest or any CLEC may submit a new systems CR which must include evidence of the change in circumstance, such as an estimated volume increase or changes in technical feasibility, and the number of the CR that was implemented using a manual process. The CR originator may request that the new CR be treated as a Regulatory CR. If Qwest or any CLEC does not agree to treat the new CR as a Regulatory CR, it will be treated as a Qwest or CLEC originated change.

Any party that disagrees with the majority decision regarding Exceptions A and B may initiate the Dispute Resolution Process. (See Section 15.0)

5.1.3 Industry Guideline Change Request

Industry Guideline CRs will be submitted as Systems CRs, but if it is determined they should be implemented as a Product/Process change, the CR will follow the Crossover process as documented in Section 5.7. The party submitting the Industry Guideline CR must identify on the CR Form that the CR should be designated an Industry Guideline CR and identify the industry forum that recommended that change. The party submitting an Industry Guideline CR must also include sufficient information to justify the CR being treated as an Industry Guideline CR in the Description of Change section of the CR Form. Such information must include specific references to the industry forum issue or recommendation and the recommended implementation date, if any.

5.1.4 Systems Change Request Origination Process

If a CLEC or Qwest wants Qwest to change, introduce or retire an OSS Interface, the originator will e-mail a Change Request (CR) Form to the Qwest CMP Manager, cmpcr@qwest.com. No later than two (2) business days after Qwest receives the CR, the Qwest CMP Manager reviews the CR for completeness, and requests additional information from the CR originator, if necessary.

Once the CR is complete:

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- The Qwest CMP Manager will assign a CR Number, and log the CR into the CMP database
- The Qwest CMP Manager sends acknowledgement of receipt to the CR originator and updates the CMP database.

Within two (2) days after acknowledgement:

- The CMP Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate Director responsible for the CR.
- The Qwest CMP Manager posts the valid CR to the CMP Web site via Qwest's interactive report. The report will contain the CR details, originator identity, assigned CRPM, assigned CR Number and, when practicable, the designated Qwest SME and associated Director.
- The CRPM obtains from the Director the names of the assigned Subject Matter Expert(s) (SME)
- The CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
  - Description of CR
  - Originating CLEC
  - Assigned CRPM contact information
  - Assigned CR number
  - Designated Qwest SMEs and associated director(s)
  - Status of the CR (e.g., Submitted)

Within eight (8) business days after receipt of a complete CR, the CRPM coordinates and holds a clarification meeting with the CR originator and Qwest's SME(s). If the originator is not available within the above specified time frame, then the clarification meeting will be held at a mutually agreed upon time. Qwest may not provide a response to a CR until a clarification meeting has been held. The CR originator may invite representatives from other companies to participate on the clarification call. Such participation is not intended to replace the presentation of the CR at the Monthly CMP Meeting.

At the clarification meeting, Qwest and the originator will review the submitted CR, validate the intent of the originator's CR, clarify all aspects, identify all questions to be answered, and determine deliverables Qwest must produce in order to close the CR. The originator should provide, in the CR, as much detail as possible. After the clarification meeting has been held, the CRPM will document and issue meeting minutes within five (5) business days.

CRs received fourteen (14) calendar days prior to the next scheduled Monthly CMP Systems Meeting will be presented at that Monthly CMP Systems Meeting for clarification from all CLECs participating in the Monthly CMP Systems Meeting.

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At the Monthly CMP Systems Meeting, the originator will present the CR and provide any business reasons for the CR. Items or issues identified during the previously held clarification meeting will be relayed. CLECs participating in the Monthly CMP Systems Meeting will be given the opportunity to comment on the CR and provide additional clarifications. If appropriate, Qwest's SME(s) will identify options and potential solutions to the CR. Clarifications and/or modifications related to the CR will be incorporated into the evaluation of the CR.

CRs that are not submitted fourteen (14) calendar days prior to the Monthly CMP Systems Meeting may be introduced at that Monthly CMP Systems Meeting as walk-on items. The Originating CLEC will present the CR and participating CLECs will be allowed to provide comments to the CR. Qwest will provide a status of the CR.

Qwest will develop a draft response based on the CR discussion at the Monthly CMP Systems Meeting. Prior to the next scheduled Monthly CMP Systems Meeting the CRPM will post responses to systems CRs to the CMP database. The response will be made available via the interactive reports and the distribution package for the Monthly CMP Systems Meeting. Qwest will conduct a walk through of the response and participating CLECs will be provided the opportunity to discuss, clarify and comment on Qwest's Response. Qwest's Responses will be either:

- "Accepted" (Qwest will implement the request) with position stated, or
- "Denied" (Qwest will not implement the request) with basis for the denial and a detailed explanation, including reference to substantiating material. OSS Interface Change Request may be denied for one or more of the following reasons:
  - Technologically not feasible—a technical solution is not available
  - Regulatory ruling/Legal implications—regulatory or legal reasons prohibit the change as requested, or if the request benefits some CLECs and negatively impact others (parity among CLECs) (Contrary to ICA provisions)
  - Outside the Scope of the Change Management Process—the request is not within the scope of the Change Management Process (as defined in this CMP), seeks adherence to existing procedures, or requests for information
  - Economically not feasible—low demand, cost prohibitive to implement the request, or both
  - The requested change does not result in a reasonably demonstrable business benefit (to Qwest or the requesting CLEC) or customer service improvement

Qwest will not deny a CR solely on the basis that the CR involves a change to back-end systems. Qwest will apply these same concepts to CRs that Qwest originates. The Special Change Request Process (SCRP) (Section 10.4) may be invoked if a CR was denied as economically not feasible.

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Based on the comments received from the Monthly CMP Systems Meeting, Qwest may revise its response and issue a revised draft response at the next Monthly CMP Systems Meeting.

If any CLEC does not accept Qwest's response, any CLEC may elect to escalate or dispute the CR in accordance with the agreed upon CMP Escalation Process or Dispute Resolution Process. (Sections 14.0 and 15.0) If the Originator does not agree with the determination to escalate or pursue dispute resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuing the CR Escalation upon providing written notification to the Qwest CMP Manager, cmpcr@qwest.com. The CR will be assigned an escalation suffix and remain an active CR. Qwest will note in the status history of the interactive reports that the CR has been escalated. However, the CR status will reflect the stage of the CR as it progresses through the CR lifecycle.

If any CLEC does not accept Qwest's response and does not intend to escalate or dispute at the present time, it may request Qwest to status the CR as 'Deferred.' The CR will remain as Deferred and any CLEC may re-activate the CR at a later date.

NOTE: For system CRs associated with Billing, CRs will likely be prioritized for a specific set of Qwest billing system implementation dates (referred in this document as a "Release" or "release") versus one specific release with a single implementation date which is the case for IMA and CEMR/MEDIACC. In the context of Billing prioritization and/or packaging, when "release" is referred to, the reference is to a specific set of billing system implementation dates.

At the last Monthly CMP Systems Meeting before Prioritization, Qwest will facilitate the presentation of all CRs eligible for Prioritization. In order for a CR to be eligible for prioritization in the upcoming release, it must be presented at least one (1) month prior to the Prioritization Review meeting in accordance with Section 10.3.1. At this meeting Qwest will provide a high level estimate of the Level of Effort of each CR and the estimated total capacity of the Release. This estimate will be an estimate of the number of person hours required to incorporate the CR into the Release. Ranking will proceed, as described in Section 10.0, Prioritization. The results of the ranking will produce an Initial Prioritization List.

Pursuant to this CMP, Qwest may develop a temporary manual solution to a mechanized change identified in an active systems CR. In these situations, Qwest will open a second systems CR with the same number as the original CR and a "MN" suffix. Qwest will process this "MN" CR as a systems CR through its entire life cycle. During this time the original systems CR will remain open and follow the appropriate systems CR process. The temporary manual solution will remain available at least until closure of the associated systems CR. If possible, all

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or part of the temporary manual solution can be reintroduced in Production Support if a manual workaround is required. A new CR is not required to revert to the temporary manual solution.

5.2 CLEC-Qwest OSS Interface Change Request Lifecycle

A CLEC or Qwest may elect to withdraw a CR that has been prioritized for an OSS Interface Release, in accordance with Section 10.3.5. Based on the Initial Prioritization List, Qwest will begin its development cycle that includes the milestones listed below.

5.2.1 Business and Systems Requirements

Qwest engineers define the business and functional specifications during this phase. The specifications are completed on a per candidate basis in priority order. During business and system requirements, any candidates which have affinities and may be more efficiently implemented together will be discussed. Candidates with affinities are defined as candidates with similarities in functions or software components. Qwest will present, at the Monthly CMP Systems Meeting, any complexities, changes in candidate size, or other concerns that may arise during business or system requirements, which would impact the implementation of the candidate.

During the business and systems requirement efforts, CRs may be modified or new CRs may be generated (by CLECs or Qwest), with a request that the new or modified CRs be considered for addition to the Initial Prioritization List (late added CRs). If there is a unanimous votes (see Section 17.0) to consider the late added CRs for addition to the Initial Prioritization List, Qwest will size the CR's requirements work effort. If the requirements work effort for the late added CRs can be completed by the end of system requirements, the candidate list and the new CRs will be prioritized by CLECs in accordance with the agreed upon Ranking of Later Added CR process (see Section 10.3.4). If the requirements work effort for the late added CRs cannot be completed by the end of system requirements, the CR will not be eligible for the Release and will be returned to the pool of CRs that are available for prioritization in the next OSS Interface Release. If packaging has already been presented as described in 5.2.2, any party seeking to submit a late-added CR must follow the Exception process.

5.2.2 Packaging

At the conclusion of system requirements, Qwest will present packaging option(s) for implementing the release candidates, including a package of only the prioritized candidates in order. Packaging options are defined as different combinations of candidates proposed for continuing through the next stage of development. Packaging options may not exist for the

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Release; *i.e.*, there may only be one straightforward set of candidates to continue working through the next stage of development. Options may be identified due to:

- affinities in candidates
- resource constraints which prevent some candidates from being implemented but allow others to be completed

Qwest will provide an updated estimate of the Level of Effort for each CR and the estimated total capacity of the Release. If more than one option is presented, a vote will be held within two (2) days after the meeting on the options. The packaging option with the largest number of votes will continue through the design phase of the development cycle.

5.2.3 Design

Qwest engineers define the architectural and code changes required to complete the work associated with each candidate. The design work is completed on the candidates, which have been packaged.

5.2.4 Commitment

After design, Qwest will present a commitment list of CRs that can be implemented. Qwest will provide an updated Level of Effort for each CR and the estimated total capacity of the Release. These candidates become the committed candidates for the Release.

5.2.5 Code & Test

Qwest engineers will perform the coding and testing required by Qwest to complete the work associated with the committed candidates. The code is developed and baselined before being delivered to system test. A system test plan (system test cases, costs, schedule, test environment, test data, etc.) is completed. The system is tested for meeting business and system requirements, certification is completed on the system readiness for production, and pre-final documentation is reviewed and baselined. If, in the course of the code and test effort, Qwest determines that it cannot complete the work required to include a candidate in the planned Release, Qwest will discuss options with the CLECs in the next Monthly CMP Systems Meeting. Options can include either the removal of that candidate from the list or a postponement in the implementation date to incorporate that candidate. If the candidate is removed from the list, Qwest will also advise the CLECs whether or not the candidate could become a candidate for the next Point Release, with appropriate disclosure as part of the current Major Release of the OSS Interface. Alternatively, the candidate will be returned to the pool of CRs that are available for prioritization in the next OSS Interface Release.

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5.2.6 Deployment

During the deployment phase, Qwest representatives from the business and operations review and agree the system is ready for full deployment. Qwest deploys the Release and initiates and conducts production support .

When Qwest has completed development of the OSS Interface change, Qwest will release the OSS Interface functionality into production for use by the CLECs.

Upon implementation of the OSS Interface Release, the CRs will be updated to CLEC test and presented for closure at the next Monthly CMP Systems Meeting.

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Figure 1: IMA Software Development Timeline

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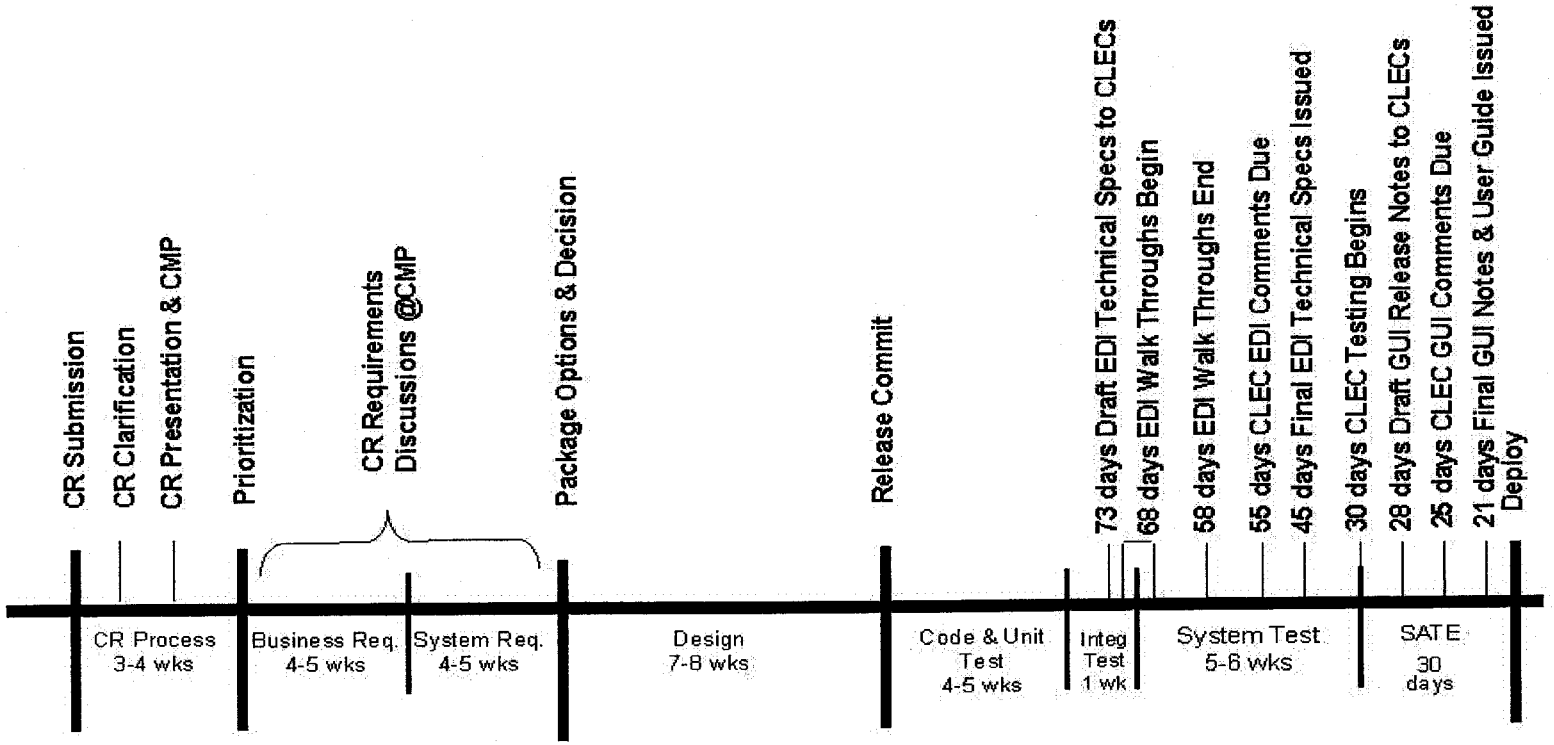
IMA Software Development Timeline

Time for each phase is approximate and based on current release timelines. Time per phase can change per business needs.



5.3 CLEC Originated Product/Process Change Request Process

If a CLEC wants Qwest to change a product/process, the CLEC e-mails a Change Request (CR) Form to the Qwest CMP Manager, cmpcr@qwest.com. No later than two (2) business days after Qwest receives the CR:

- The Qwest CMP Manager reviews the CR for completeness, and requests additional information from the CR originator, if necessary
- The Qwest CMP Manager assigns a CR Number and logs the CR into the CMP database
- The Qwest CMP Manager sends acknowledgment of receipt to the CR originator and updates the CMP Database

Within two (2) business days after acknowledgement:

- The Qwest CMP Manager posts the detailed CR report to the CMP Web site
- The CMP Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate Director responsible for the CR
- The CRPM obtains from the Director the names of the assigned Subject Matter Expert(s) (SME)
- The CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
  - Description of CR
  - Originator (*i.e.,*CLEC name)
  - Assigned CRPM contact information
  - Assigned CR number
  - Designated Qwest SMEs and associated director(s)
  - Status of the CR (e.g, Submitted)

Within eight (8) business days after receipt of a complete CR, the CRPM coordinates and holds a clarification meeting with the Originating CLEC and Qwest's SMEs. If the originating CLEC is not available within the above specified time frame, then the clarification meeting will be held at a mutually agreed upon time. Qwest will not provide a response to a CR until a clarification meeting has been held. The CR originator may invite representatives from other companies to participate on the clarification call. Such participation is not intended to replace the presentation of the CR at the Monthly CMP Meeting.

At the clarification meeting, Qwest and the Originating CLEC will review the submitted CR, validate the intent of the Originating CLEC's CR, clarify all aspects, identify all questions to be answered, and determine deliverables to be produced. After the clarification meeting has been held, the CRPM will document and issue meeting minutes within five (5) business days. Qwest's SME will internally identify options and potential solutions to the CR.

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CRs received fourteen (14) calendar days prior to the next scheduled Monthly CMP Product/Process Meeting will be presented at that Monthly CMP Product/Process Meeting. CRs that are not submitted by the above specified cut-off date may be presented at that Monthly CMP Product/Process Meeting as a walk-on item with current status. The Originating CLEC will present the CR and provide any business reasons for the CR. Items or issues identified during the previously held clarification meeting will be relayed. Participating CLECs will be given the opportunity to comment on the CR and subsequent clarifications. If appropriate, Qwest's SME(s) will identify options and potential solutions to the CR. Clarifications and/or modifications related to the CR will be incorporated into the evaluation of the CR. Subsequently, Qwest will develop a draft response based on the discussion from the Monthly CMP Product/Process Meeting. Qwest's response will be:

- "Accepted" (Qwest will implement the CLEC request) with position stated, or
- "Denied" (Qwest will not implement the CLEC request) with basis for the denial and a detailed explanation, including reference to substantiating material. CLEC originated Product/Process Change Request may be denied for one or more of the following reasons:
  - Technologically not feasible—a technical solution is not available
  - Regulatory ruling/Legal implications—regulatory or legal reasons prohibit the change as requested, or if the request benefits some CLECs and negatively impact others (parity among CLECs) (Contrary to ICA provisions)
  - Outside the Scope of the Change Management Process—the request is not within the scope of the Change Management Process (as defined in this CMP), seeks adherence to existing procedures, or requests for information
  - Economically not feasible—low demand, cost prohibitive to implement the request, or both
  - The requested change does not result in a reasonably demonstrable business benefit (to Qwest or the requesting CLEC) or customer service improvement

Qwest will not deny a CR solely on the basis that the CR involves a change to the back-end systems. Qwest will apply these same concepts to CRs that Qwest originates. SCRP may be invoked if a CR was denied due to Economically not feasible.

At least one (1) week prior to the next scheduled Monthly CMP Product/Process Meeting, the CRPM will have the response posted to the Web, added to the CMP Database, and will notify all CLECs via e-mail.

All Qwest Responses will be presented at the next scheduled Monthly CMP Product/Process Meeting. Qwest will conduct a walk through of its Response. Participating CLECs will be provided the opportunity to discuss, clarify and comment on Qwest's Response.

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Based on the comments received from the Monthly CMP Product/Process Meeting, Qwest may revise its Response and issue a modified Response at the next Monthly CMP Product/Process Meeting. Within ten (10) business days after the Monthly CMP Product/Process Meeting, Qwest will notify the CLECs of Qwest's intent to modify its Response.

If the CLECs do not accept Qwest's Response, any CLEC can elect to escalate or dispute the CR in accordance with the agreed upon CMP Escalation Process or Dispute Resolution Process. (See Sections 14.0 and 15.0) If the originating CLEC does not agree with the determination to escalate or pursue dispute resolution, it may withdraw its participation from the CR and any other CLEC may become responsible for pursuing the CR upon providing written notification to the Qwest CMP Manager, cmpcr@qwest.com. Qwest will note in the status history of the interactive reports that the CR has been escalated. However, the CR status will reflect the stage of the CR as it progresses through the CR lifecycle.

If the CLECs do not accept Qwest's Response and do not intend to escalate or dispute at the present time, they may request Qwest to status the CR as Deferred. The CR will remain as Deferred and CLECs may reactivate the CR at a later date.

The CLECs' acceptance of Qwest's Response may result in:

- The Response answered the CR and no further action is required
- The Response provided an implementation plan for a product/process to be developed
- Qwest Denied the CLEC CR and no further action is required by CLEC

5.3.1 Implementation Notification

If the CLECs have accepted Qwest's response, Qwest will provide notice of planned implementation as follows.

Prior to implementing a CLEC originated product/process CR Qwest must notify the CLECs of the pending change. Qwest will issue such notifications at the time it intends to implement a CLEC originated change (in whole or in part). It is possible that more than one such notification will be issued in order to fully address the CLEC requested change. Such notifications may be issued during CLEC Test and may continue to be issued until the CLEC initiated CR is closed. These notifications will adhere to the notification standards for Level 1, Level 2, and Level 3 detailed in Section 5.4 (Qwest Originated Product/Process Changes). If the change is not specifically captured in the existing Level categories, or if the change is captured in the Level 4 categories, Qwest will follow the Level 3 notification schedule.

Finally, the CR will be closed when CLECs determine that no further action is required for that CR.

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5.4 Qwest Originated Product/Process Changes

The following defines five levels of Qwest originated product/process changes and the process by which Qwest will originate and implement these changes. None of the following shall be construed to supersede timelines or provisions mandated by federal or state regulatory authorities, certain CLEC facing Web sites (e.g., ICONN and Network Disclosures) or individual interconnection agreements. Each notification will state that it does not supercede individual interconnection agreements. The lists of change categories under each level provided below are exhaustive/finite but may be modified by the process set forth in Section 2.1. Qwest will utilize these lists when determining the disposition level to which new changes will be categorized. The changes that go through these processes are not changes to OSS Interfaces. Level 1-4 changes under this process will be tracked and differentiated by level in the History Log for the affected documents.

5.4.1 Level 0 Changes

Level 0 changes are defined as changes that do not change the meaning of documentation and do not alter CLEC operating procedures. Level 0 changes are effective immediately without notification.

Level 0 Change Categories are:

- Font and typeface changes (e.g., bold to un-bold or bold to italics)
- Capitalization
- Spelling corrections and typographical errors other than numbers that appear as part of an interval or timeframe
- Hyphenation
- Acronym vs. non-acronym (e.g., inserting words to spell out an acronym)
- Symbols (e.g., changing bullets from circles to squares for consistency in document)
- Word changes from singular to plural (or vice versa) to correct grammar
- Punctuation
- Changing of a number to words (or vice versa)
- Changing a word to a synonym
- Contact personnel title changes where contact information does not change
- Alphabetizing information
- Indenting (left/right/center justifying for consistency)
- Grammatical corrections (making a complete sentence out of a phrase)
- Corrections to apply consistency to product names (i.e., "PBX - Resale" changed to "Resale - PBX")
- Moving paragraphs/sentences within the same section of a document to improve readability

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- Hyperlink corrections within documentation
- Removing unnecessary repetitive words in the same paragraph or short section.

For any change that Qwest considers a Level 0 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

5.4.1.1 Level 0 Process/Deliverables

For Level 0 changes, Qwest will not provide a notification, Web change form, or History Log to CLECs. Changes to the documentation will be updated and posted immediately.

5.4.2 Level 1 Changes

Level 1 changes are defined as changes that do not alter CLEC operating procedures or changes that are time critical corrections to a Qwest product/process. Time critical corrections may alter CLEC operating procedures, but only if such Qwest product/process has first been implemented through the appropriate level under CMP. Level 1 changes are effective immediately upon notification.

Level 1 Change Categories are:

- Time critical corrections to information that adversely impacts CLECs' ability to conduct business with Qwest
- Corrections/clarifications/additional information that do not change the product/process
- Corrections to synch up related PCAT documentation with the primary PCAT documentation that was modified through a higher level change (notification needs to include reference to primary PCAT documentation)
- Document corrections to synch up with existing OSS Interfaces documentation (notification needs to include reference to OSS Interfaces documentation)
- Process options with no mandatory deadline, that do not supercede the existing processes and that do not impose charges, regardless of whether the CLEC exercises the option
- Modifications to Frequently Asked Questions that do not change the existing product/process
- Re-notifications issued within one hundred and eighty (180) calendar days after initial notification (notification will include reference to date of initial notification or, if not available, reference to existing PCAT)
- Regulatory Orders that mandate a product/process change to be effective in less than twenty-one (21) days
- Training information (note: if a class is cancelled, notification is provided two (2) weeks in advance)

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- URL changes with redirect link

For any change that Qwest considers a Level 1 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

5.4.2.1 Level 1 Process/Deliverables

For Level 1 changes, Qwest will provide a notification to CLECs. Level 1 notifications will state the disposition level 1, description of change, that changes are effective immediately, that there is no comment cycle and will advise CLECs to contact the CMP Manager by e-mail at cmpcr@qwest.com immediately if the change alters the CLECs' operating procedures and requires Qwest's assistance to resolve. Qwest will respond to the CLEC, within one (1) business day, and work to resolve the issue. Possible resolutions may include withdrawal of the change, re-notification under a different level or creation of a new category of change under a different level. In addition, Qwest will provide the following for PCAT and Non-FCC Technical Publication ("Tech Pub") changes:

- The complete red-lined PCAT or Non-FCC Tech Pub will be available for review in the Product/Process Document Review Archive section of the CMP Web site, http://www.uswest.com/wholesale/cmp/review_archive.html,
- A History Log that tracks the changes

5.4.3 Level 2 Changes

Level 2 changes are defined as changes that have minimal effect on CLEC operating procedures. Qwest will provide notification of Level 2 changes at least twenty-one (21) calendar days prior to implementation.

Level 2 Change Categories are:

- Contact Information updates excluding time critical corrections (Expedites and Escalations Overview (http://www.qwest.com/wholesale/clecs/exescover.html), Wholesale Customer Contacts (http://www.qwest.com/wholesale/clecs/escalations.html), Technical Escalations Contact List (http://www.qwest.com/wholesale/systems/productionsupport.html), CMP Points of Contact (POCs, Qwest POC changes only) (http://www.qwest.com/wholesale/cmp/poc.html))
- Changes to a form that do not introduce changes to the underlying process
- Changes to eliminate/replace existing Web functionality will be available for twenty-one (21) days until comments are addressed. (Either a demo or screen shot presentation will be available at the time of the notification for evaluation during the twenty-one (21) day cycle.)
- Removal of data stored under an archive URL
- Elimination of a URL re-direct

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- Addition of new Web functionality (e.g., CNLA)
- Re-notifications issued one hundred and eighty (180) calendar days or more after the initial notification (notification will include reference to date of initial notification or, if not available, reference to existing PCAT)
- Documentation concerning existing processes/products not previously documented
- Changes to manually generated notifications normally transmitted to CLECs through their OSS Interfaces that are made to standardize or clarify, but do not change the reasons for, such notifications
- LSOG/PCAT documentation changes associated with new OSS Interface Release documentation resulting from an OSS Interface CR
- Reduction to an interval in Qwest's SIG

For any change that Qwest considers a Level 2 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

5.4.3.1 Level 2 Process/Deliverables

For Level 2 changes, Qwest will provide a notification to CLECs. Level 2 notifications will state the disposition level 2, description of change, proposed implementation date, and CLEC/Qwest comment cycle timeframes. In addition to the notification, any documentation changes required to PCATs and Non-FCC Tech Pubs will be red-lined and available for review in the Document Review section of the CMP Web site, http://www.qwest.com/wholesale/cmp/review.html, commonly known as the Document Review site. In the Document Review site, a comment button will be available next to the document to allow CLECs to provide comments. For Level 2 changes that do not impact PCATs or Non-FCC Tech Pubs, a comments link will be provided within the notification for comments.

Qwest must provide initial notification of Level 2 changes at least twenty-one (21) calendar days prior to implementation and adhere to the following comment cycle:

- CLECs have seven (7) calendar days following initial notification of the change to provide written comments on the notification.
- Qwest will reply to CLEC comments no later than seven (7) calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date. In the event there are extenuating circumstances, (e.g., requested change requires significant research, information is required from national standards body or industry (e.g., Telcordia)), Qwest's response will indicate the course of action Qwest is taking and Qwest will provide additional information when available. Once the information is available, Qwest will provide a notification and any available updated documentation (e.g., Tech Pubs, PCATs) at least seven (7) calendar days prior to implementation. If Qwest

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extends the comment response period, Qwest will present an update on the response at each Monthly CMP Product/Process Meeting until final notification is distributed.

- Qwest will implement no sooner than twenty-one (21) calendar days from the initial notification.

CLECs may provide General comments regarding the change (e.g., clarification, request for modification, request to change the disposition level of a noticed change). Comments must be provided during the comments cycle as outlined for level 2 changes.

If a CLEC requests to change the disposition level of a noticed change, CLECs and Qwest will discuss such requests at the next Monthly CMP Product/Process Meeting. In the event that timing doesn't allow for discussion at the upcoming Monthly CMP Product/Process Meeting, Qwest will call a special ad hoc meeting to address the request. If the parties are not able to reach agreement on any such request, CLECs and Qwest will take a vote in accordance with Section 17.0. The result will be determined by the Majority. If the disposition level of a change is modified, from the date of the modification forward, such change will proceed under the modified level with notifications and timelines agreed to by the participants.

For general comments, Qwest will respond to comments and provide a final notification of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and Non-FCC Tech Pubs to CLECs and implement the change(s) according to the timeframes put forth above. If there are no CLEC comments, a final notification will not be provided and the changes will be effective according to the date provided in the original notification.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate or pursue dispute resolution in accordance with the agreed upon CMP Escalation Process or Dispute Resolution Process. (See Sections 14.0 and 15.0)

5.4.4 Level 3 Changes

Level 3 changes are defined as changes that have moderate effect on CLEC operating procedures and require more lead-time before implementation than Level 2 changes. Qwest will provide initial notification of Level 3 changes at least thirty-one (31) calendar days prior to implementation.

Level 3 Change Categories are:

- NC/NCI code changes
- Adding of new features to existing products (excluding resale)
- Customer-facing Center hours and holiday schedule changes
- Modify/change existing manual process

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- Expanding the availability and applicability or functionality of an existing product or existing feature (excluding resale)
- Regulatory Orders that mandate a product/process change to be effective in twenty-one (21) days or more

For any change that Qwest considers a Level 3 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification.

5.4.4.1 Level 3 Process/Deliverables

For Level 3 changes, Qwest will provide a notification to CLECs. Level 3 notifications will state the disposition level 3, description of change, proposed implementation date, and CLEC/Qwest comment cycle timeframes. Level 3 notifications will only include Level 3 changes and any dependent Level 1 and Level 2 changes. Level 3 notifications of Tech Pub changes may include notification of any Level 1, Level 2 and Level 3 change.

For a Level 3 notification that Qwest believes should fall under a different Level, Qwest will propose the Level under which it believes that change should be processed. CLECs and Qwest will discuss the proposal in the next Monthly CMP Product/Process Meeting. In addition to the notification, any documentation changes required to PCATs and Non-FCC Tech Pubs will be red-lined and available for review in the Document Review section of the CMP Web site, http://www.qwest.com/wholesale/cmp/review.html, commonly known as the Document Review site. In the Document Review site, a comment button will be available next to the document to allow CLECs to provide written comments. For Level 3 changes that do not impact PCATs or Non-FCC Tech pubs, a link will be provided within the notification for comments.

Qwest will provide initial notification of Level 3 changes at least thirty-one (31) calendar days prior to implementation and adhere to the following comment cycle:

- CLECs have fifteen (15) calendar days following initial notification of the change to provide written comments on the notification
- Qwest will reply to CLEC comments no later than fifteen (15) calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date. In the event there are extenuating circumstances, (e.g., requested change requires significant research, information is required from national standards body or industry (e.g., Telcordia)), Qwest's response will indicate the course of action Qwest is taking and Qwest will provide additional information when available. Once the information is available, Qwest will provide a notification and any available updated documentation (e.g., Tech Pubs, PCATs) at least fifteen (15) calendar days prior to implementation. If Qwest extends the comment response period, Qwest will present an update on the response at each Monthly CMP Product/Process Meeting until final notification is distributed.

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- Qwest will implement no sooner than fifteen (15) calendar days after providing the response to CLEC comments. For example, if there are no CLEC comments, Qwest may send out a final notification on the first day following the CLEC cut-off for comments (day 16 after the initial notification). Thus, implementation would be thirty-one (31) days from the initial notification. However, if Qwest does not respond to the CLEC comments until the 15th day after the CLEC cut-off for comments, the earliest possible implementation date would be forty-five (45) calendar days from the initial notification.

CLEC comments must be provided during the comment cycle as outlined for Level 3 changes. Comments may be one of the following:

- General comments regarding the change (e.g., clarification, request for modification)
- Request to change disposition level of a noticed change
  - If the request is for a change to Level 4, the request must include substantive information to warrant a change in disposition (e.g., business need, financial impact).
  - A request to change disposition level to a Level 0, Level 1 or Level 2 is not required to include substantive information to warrant a change.
- Request for postponement of implementation date, or effective date

For general comments, Qwest will respond to comments and provide a final notification of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and Non-FCC Tech Pubs available to CLECs and implement the change(s) according to the timeframes put forth above.

CLECs and Qwest will discuss requests to change the disposition level of notified changes at the next Monthly CMP Product/Process Meeting. In the event that timing doesn't allow for discussion at the upcoming Monthly CMP Product/Process Meeting, Qwest will call a special ad hoc meeting to address the request. If the parties are not able to reach agreement on any such request, CLECs and Qwest will take a vote in accordance with Section 17.0. The result will be determined by the Majority. If the disposition level of a change is modified, from the date of the modification forward, such change will proceed under the modified level with notifications and timelines agreed to by the participants. Except that, within five (5) business days after the disposition level is changed to a Level 1, Qwest will provide a Level 1 notification.

For a request for postponement of a Level 3 change, Qwest will follow the procedures as outlined in Section 5.5 of this document.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate or pursue dispute resolution in accordance with the agreed upon CMP Escalation or Dispute Resolution procedures. (See Sections 14.0 and 15.0)

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5.4.5 Level 4 Changes

Level 4 changes are defined as changes that have a major effect on existing CLEC operating procedures or that require the development of new procedures. Level 4 changes will be originated using the CMP CR process and provide CLECs an opportunity to have input into the development of the change prior to implementation.

Level 4 Change Categories are:

- New products, features, services (excluding resale)
- Increase to an interval in Qwest's Service Interval Guide (SIG)
- Changes to CMP
- New PCAT/Tech Pub for new processes
- New manual process
- Limiting the availability and applicability or functionality of an existing product or existing feature
- Addition of a required field on a form excluding mechanized forms that are changed through an OSS Interface CR (See Section 5.1)

For any noticed change that Qwest considers a Level 4 change that does not specifically fit into one of the categories listed above, Qwest shall issue a Level 3 notification with an indication in the notification that Qwest believes the change should be a Level 4 change.

5.4.5.1 Level 4 Process/Deliverables

Qwest will submit a completed Change Request no later than fourteen (14) calendar days prior to the Monthly CMP Product/Process Meeting. At a minimum, each Change Request will include the following information:

- A description of the proposed change
- A proposed implementation date (if known)
- Indication of the reason for change (e.g., regulatory mandate)
- Basis for disposition of Level 4

Within two (2) business days from receipt of the CR:

- The Qwest CMP Manager assigns a CR Number and logs the CR into the CMP Database
- The Qwest CMP Manager sends acknowledgment of receipt to the CR originator and updates the CMP Database

Within two (2) business days after acknowledgement:

- The Qwest CMP Manager posts the detailed CR report to the CMP Web site

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- The CMP Manager assigns a Change Request Project Manager (CRPM) and identifies the appropriate Director responsible for the CR
- The CRPM identifies the CR Subject Matter Expert (SME) and the SME's Director.
- The CRPM will provide a copy of the detailed CR report to the CR originator which includes the following information:
  - Description of CR
  - Assigned CRPM
  - Assigned CR number
  - Designated Qwest SME(s) and associated director(s)
  - Status of the CR (e.g., Submitted)

Qwest will present the Change Request at the Monthly CMP Product/Process Meeting. The purpose of the presentation will be to:

- Clarify the proposal with the CLECs
- Confirm the disposition level of the Change (see below).
- Propose suggested input approach (e.g., a 2 hour meeting, 4 meetings over a two week period, etc.), and obtain agreement for input approach
- Confirm deadline, if change is mandated
- Provide proposed implementation date, if applicable

At the Monthly CMP Product/Process Meeting, the parties will discuss whether to treat the Change Request as a Level 4 change. If the parties agree, the Change Request will be reclassified as a Level 0, 1, 2 or 3 change, and the change will follow the process set forth above for Level 0, 1, 2, or 3 changes, as applicable. If the parties do not agree to reclassify the Change Request as a Level 0, 1, 2 or 3 change, the following process will apply:

- The parties will develop a process for Qwest to obtain CLEC input into the proposed change. Examples of processes for input include, but are not limited to, one-day conferences, multi-day conferences, or written comment cycles.
- After completion of the input cycle, as defined during the Monthly CMP Product/Process Meeting, Qwest will modify the CR, if necessary, and design the solution considering all CLEC input.
- For Level 4 changes, when the solution is designed and all documentation is available for review, a notification of the planned change is provided to the CLECs. Level 4 notifications will only include Level 4 changes and any dependent Level 1, Level 2 changes, and Level 3 changes. Level 4 notifications of Tech Pub changes may include notification of any Level 1, Level 2, Level 3, and Level 4 change. This notification will be provided at least thirty one (31) calendar days prior to implementation. The notification will contain reference to the original CR, proposed implementation date, and the CLEC/Qwest comment cycle. In addition, any documentation changes required to PCATs and Non-FCC Tech Pubs will be

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red-lined and available for review in the Document Review site with a Comment button available to provide written comments. For Level 4 changes that do not impact PCATs or Non-FCC Tech Pubs, a comments link will be provided within the notification.

- CLECs have fifteen (15) calendar days following notification of the planned change to provide written comments on the notification
- Qwest will reply to CLEC comments no later than fifteen (15) calendar days following the CLEC cut-off for comments. The Qwest reply will also include confirmation of the implementation date. In the event there are extenuating circumstances, (e.g., requested change requires significant research, information is required from national standards body or industry (e.g., Telcordia)), Qwest's response will indicate the course of action Qwest is taking and Qwest will provide additional information when available. Once the information is available Qwest will provide a notification and any available updated documentation (e.g., Tech Pubs, PCATs) at least fifteen (15) calendar days prior to implementation. If Qwest extends the comment response period, Qwest will present an update on the response at each Monthly CMP Product/Process Meeting until final notification is distributed.
- Qwest will implement no sooner than fifteen (15) calendar days after providing the response to CLEC comments. For example, if there are no CLEC comments, Qwest may send out a final notification on the first day following the CLEC cut-off for comments (day 16 after the initial notification). Thus, implementation would be thirty one (31) days from the initial notification. However, if Qwest does not respond to the CLEC comments until the 15th day after the CLEC cut-off for comments, the earliest possible implementation date would be forty five (45) calendar days from the initial notification.

CLEC comments must be provided during the comment cycle as outlined for Level 4. CLEC comments may be one of the following:

- General comments regarding the change (e.g., clarification, request for modification)
- Request for postponement of implementation, or effective date for which comments are being provided.

For general comments, Qwest will respond to comments and provide a final notification of the change. Additionally, Qwest will provide documentation of proposed changes to Qwest PCATs and Non-FCC Tech Pubs available to CLECs and implement the change(s) according to the timeframes put forth above.

For a request for postponement of a Level 4 change, Qwest will follow the procedures as outlined in Section 5.5 of this document.

If the CLECs do not accept Qwest's response, any CLEC may elect to escalate the CR or pursue the Dispute Resolution Process in accordance with Section 15.0.

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5.5 Postponement and Arbitration of a Product/Process Change

A CLEC may request that Qwest postpone the implementation of a Qwest-originated or CLEC-originated product/process change in accordance with this section.

5.5.1 Timeframe for Request for Postponement

A CLEC invokes the Postponement Process in accordance with the conditions and timeframes specified below:

5.5.1.1 Qwest-Originated Product /Process Changes

For Qwest-originated Level 3 or Level 4 product/process changes, if a CLEC intends to invoke the postponement process, it must do so during the final CLEC comment period.

If, however, in its response to CLEC comments Qwest revises the proposed change and that revision materially impacts a CLEC, a CLEC may invoke the postponement process within five (5) business days after the issuance of Qwest's final notification of the change.

5.5.1.2 CLEC-Originated Product/Process Changes

For CLEC-originated product/process changes, if a CLEC intends to invoke the postponement process, it must do so during the CLEC comment period applicable to the notification called for in Section 5.3.1.

If, however, in its response to CLEC comments Qwest revises the proposed change and that revision materially impacts a CLEC, a CLEC may invoke the postponement process within five (5) business days after the issuance of Qwest's final notification of the change.

5.5.1.3 A CLEC may Join or Oppose a Postponement Request

A CLEC may only join or oppose a postponement request if it submits a request to join or oppose the postponement request within two (2) business days after the issuance date of Qwest's notification to the CLECs that a postponement request has been received by Qwest.

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5.5.2 Process for Initiating a Postponement Request

5.5.2.1 CLEC Initiates Postponement Request by E-mail

A request for postponement, a request to join a postponement request or opposition to a postponement request must be sent to the Qwest CMP Postponement e-mail address (cmpesc@qwest.com).

The subject line of the request must include:

- CLEC Company Name
- POSTPONEMENT
- Change Request (CR) number or Notification Subject Line and Notification Date as appropriate

5.5.2.1.1 Required Content for Request for Postponement

A CLEC may request that Qwest postpone implementation of all or part of the proposed change until the issue is resolved in CMP or until the dispute is resolved pursuant to the Dispute Resolution Process (Section 15.0). In its request for postponement, whether initiating or joining a postponement request, a CLEC shall provide the following information, if relevant:

- The basis for the request for a postponement;
- The extent of the postponement requested, including the portions of the proposed change to be postponed and length of requested postponement;
- The harm that the CLEC will suffer if the proposed change is not postponed, including the business impact on the CLEC if the proposed change is not postponed; and
- Whether and how the CLEC alleges that the proposed change violates its interconnection agreement(s) or any applicable commission rules or any applicable law.

5.5.2.1.2 Additional Requirement for Request for Postponement Arising from Revision

If a CLEC requests a postponement because Qwest's response to CLEC comments includes a revision of the proposed change and that revision materially impacts a CLEC, such a request must contain a description of why Qwest's response affects the CLEC in a new or different way than the proposed change initially affected the CLEC, along with the information that would have been required if the CLEC submitted a request for postponement in its comments.

5.5.2.1.3 Opposition to a Postponement Request

If a CLEC wishes to oppose a postponement request, it must submit its opposition to a postponement request within the same time period that CLECs have to join a postponement

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request. Any opposition to a postponement request must include information responsive to the assertions made by the CLEC seeking postponement as called for in Section 5.5.2.1.1. For example, under Section 5.5.2.1.1, CLEC(s) seeking postponement must describe the harm it will suffer if the change is not postponed. In response to this assertion, a CLEC opposing a postponement request will state the harm it would suffer if Qwest does postpone the change.

5.5.2.2 Qwest will Work to Resolve CLEC Concerns

Following the receipt of a postponement request, Qwest will proactively work with the objecting CLEC(s) to resolve the concerns of the CLEC(s).

5.5.2.3 Qwest Acknowledges Receipt of Request and Notifies CLECs

Within two (2) business days after receipt of the postponement request, Qwest will acknowledge receipt of the postponement request or the request to join the postponement with an acknowledgment e-mail to the originator of the request. If the request does not contain the relevant information, as specified in Section 5.5.2.1.1, Qwest will notify the CLEC by the close of business on the following day, identifying and requesting information that was not originally included. When the postponement e-mail is complete, the acknowledgment e-mail will include:

- Date and time of receipt of postponement request
- Date and time of acknowledgment e-mail
- Qwest will give notification and post the postponement request and any associated responses on the CMP Web site within three (3) business days after receipt of the complete request or response.

5.5.3 Qwest's Determination of Postponement Request

The standard set forth in this section applies only to Qwest's postponement determination under this section and the arbitrator's determination under Section 5.5.4.5 and has no bearing on the standard applicable to any other review or determination.

5.5.3.1 Standard for Determining whether to Postpone.

Qwest will postpone the implementation of the proposed change whenever Qwest reasonably determines that postponing the proposed change will prevent more harm or cost to the requesting and any joining CLECs than postponing the proposed change imposes harm or cost upon Qwest or any CLECs who oppose the postponement. Qwest will postpone the implementation of the proposed change if it is inconsistent with a requesting or joining CLEC's interconnection agreement, applicable commission rule or law.

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Qwest will not postpone the implementation of the proposed change whenever Qwest reasonably determines that postponing the proposed change will impose more harm or cost upon Qwest or any CLECs who oppose the postponement than postponing the proposed change will prevent harm or cost to the CLECs supporting the postponement. Qwest will provide in its response notification that the proposed change will not be postponed.

5.5.3.2 Qwest's Response to Request for Postponement

If Qwest decides to postpone the proposed change, it will provide the following information in its response:

- The time period (not less than thirty (30) calendar days) for which the proposed change will be postponed;
- The CLECs for which the proposed change will be postponed; and
- Any other details of the postponement, including the portions of the proposed change to be postponed and the length of the postponement.

If Qwest decides not to postpone the proposed change, it will provide in its response:

- The reason the requested postponement is not being implemented;
- An explanation of the harm and cost evaluation; and
- How Qwest alleges that the proposed change is consistent with interconnection agreement(s) or any applicable commission rules or any applicable law.

5.5.3.3 30-day Postponement if Request is Denied

If Qwest does not grant the requested postponement, Qwest will not implement the objected-to proposed change for at least thirty (30) calendar days following notification to CLECs that Qwest will not postpone the proposed change.

5.5.4 Optional Arbitration Process for Interim Postponement of Disputed Changes while Dispute Resolution Proceeds

If Qwest does not postpone a proposed change and a CLEC has initiated Dispute Resolution proceedings (Section 15.0) with regard to the proposed change, the CLEC has the option to request a neutral arbitrator to determine whether Qwest must postpone implementation of that proposed change. This optional arbitration provides interim relief only and is limited to the question of whether Qwest must postpone implementation of the proposed change until the dispute or the postponement request is resolved under the Dispute Resolution process. The arbitrator's decision will have application in all of the states where the CLEC initiates Dispute Resolution proceedings on the issue. As decisions on the dispute or the postponement

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request are made in each state, such decisions will supersede the determination of the arbitrator for that state.

All references in Section 5.5.4 (including all subsections) to "CLEC" and "CLECs" include all CLECs who have submitted or joined requests for postponement of a proposed change, initiated Dispute Resolution proceedings and seek arbitration for the interim postponement of the same proposed change. There may be multiple CLECs seeking postponement of the same proposed change in any given state. Such CLECs will, to the greatest extent possible, cooperate with one another to select a single arbitrator to address the issue of interim postponement for a given state. In the event that one or more CLECs have initiated Dispute Resolution proceedings on the issue of interim postponement of the same proposed change in multiple states, such CLECs may agree to the use of a single arbitrator to address such issue for all such states.

References in Section 5.5.4 (including all subsections) to "parties" will include Qwest and all CLECs who have submitted or joined requests for postponement of the same proposed change, initiated Dispute Resolution proceedings and seek arbitration for the interim postponement of that proposed change. However, the reference to "all parties" in Section 5.5.4.1.1 means Qwest and all CLECs in CMP who have received proper notification, in accordance with Section 3.0, about selection of individuals for the Agreed Arbitrators List and participated in the selection discussions.

This optional arbitration process set forth below does not apply to any proceeding before a regulatory or other authority.

5.5.4.1 Selection of Arbitrator

If a CLEC chooses arbitration under this section, the parties shall select a neutral arbitrator by agreeing to an individual or by following the processes set forth below to select an arbitrator from an alternative dispute resolution organization.

5.5.4.1.1 Agreed Arbitrators List

Qwest and the CLECs may, by mutual agreement, develop a list of individual arbitrators to which all parties agree as an additional source for selection of a neutral arbitrator (Agreed Arbitrators List). Names of arbitrators may be added to the list at any time upon agreement of all parties. Qwest or any CLEC may strike an individual arbitrator from the Agreed Arbitrators List at any time, except that Qwest or any CLEC may not strike an arbitrator from the list while an arbitration initiated under this provision is pending before that arbitrator. If a CLEC chooses a name from the Agreed Arbitrators List, that individual will be the arbitrator.

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5.5.4.1.2 Alternative Dispute Resolution Organization

If a CLEC does not choose an individual arbitrator from the Agreed Arbitrators List, or if Qwest and CLECs do not otherwise agree on an individual arbitrator, then Qwest and the CLEC shall select a neutral arbitrator from any of the following pursuant to the process set forth below: Judicial Arbiter Group (JAG), American Arbitration Association (AAA), JAMS, or any other mutually agreeable alternative dispute resolution organization. Within two (2) business days after receipt of Qwest's acknowledgment e-mail, the CLEC shall advise the alternative dispute resolution organization and Qwest of the identity of the parties and the nature of the dispute and the CLEC shall acquire from JAG, AAA, JAMS, or other alternative dispute resolution organization as to which agreement is reached, a list of 5 potential arbitrators who have no apparent conflict of interest or any circumstances likely to affect their impartiality or independence and who have experience in handling general commercial disputes, along with a brief summary of each potential arbitrator's relevant background and experience. The CLEC shall forward the list to the specified Qwest contact as soon as practicable after it receives the list, along with the identity of the two of the five potential arbitrators the CLEC wishes to strike from the list. Within one business day after receipt of the list and indication of the potential arbitrators the CLEC has stricken, Qwest will respond to the CLEC contact with the two additional names Qwest wishes to strike from the list.

5.5.4.2 Initiating Postponement Arbitration

A CLEC initiates arbitration for interim postponement of Qwest's implementation of a proposed change under this provision by sending an e-mail to Qwest at cmpesc@qwest.com. The e-mail must include, at a minimum, the following:

- Subject line that includes "Postponement" and the CR [insert number] or Notification Subject Line
- The CLEC's contact person for matters relating to the postponement arbitration and method of communication (e.g., e-mail address or facsimile number)
- A statement that the CLEC desires to have a neutral arbitrator decide whether Qwest must postpone implementation of the change until the request for postponement is decided by the regulatory or other authority
- A copy of the documents that the CLEC filed with the Regulatory or other authority to initiate the dispute resolution
- The identity of the alternative dispute resolution organization or individual arbitrator the CLEC proposes to use

Within two (2) business days after receipt of the Request for Postponement Arbitration, Qwest shall respond with an e-mail acknowledging receipt of the Request for Postponement Arbitration. The e-mail must include, at a minimum, the following:

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- A subject line that includes "Acknowledgment of Request for Postponement" and the CR [insert number] or Notification Subject Line
- Qwest's contact person for matters relating to the postponement arbitration and method of communication (e.g., e-mail address or facsimile number)
- If the Request for Postponement Arbitration identifies an alternative dispute resolution organization other than those listed in Section 5.5.4.1.2 or individual other than those on the Agreed Arbitrators List, Qwest's acknowledgment will state whether it agrees to the use of that alternative dispute resolution organization or individual arbitrator and, if it does not agree, Qwest will identify an organization or individual arbitrator that appears on the Agreed Arbitrator List that it agrees to use.

Qwest and the CLEC shall communicate with one another regarding matters relating to the postponement arbitration through the contact person and by the method of communication designated in accordance with the process set forth above.

5.5.4.3 No Unilateral Communication with Arbitrator or Potential Arbitrator

Neither Qwest nor the CLEC, and no person acting on behalf of either Qwest or the CLEC, shall communicate unilaterally concerning the arbitration with the arbitrator or any potential arbitrator.

5.5.4.4 Scope of Authority of the Arbitrator

The arbitrator shall decide only the issue of whether Qwest must postpone implementation of the change. The arbitrator shall not have authority to award any damages or make any other determination outside this scope.

If the CLEC has initiated dispute resolution with regard to the same change in more than one state, a single arbitrator can decide the postponement issue for all states in which the CLEC has initiated dispute resolution proceedings regarding the same issue.

This arbitration option is not an exclusive remedy and does not preclude any CLEC from using appropriate state commission procedures, expedited or otherwise, to raise issues or seek a postponement.

5.5.4.5 Arbitrator's Decision

The arbitrator shall decide the issue upon written submissions. The CLEC and Qwest both shall submit their position statements to the arbitrator and to each other by e-mail or facsimile within one business day from the date on which agreement regarding the identity of the arbitrator is reached.

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In determining whether Qwest must postpone implementation of a proposed change, the arbitrator must apply the standards set forth in Section 5.5.3.1.

The arbitrator must provide his/her decision to Qwest and the CLECs within five (5) business days after receipt of the parties' position statements. The arbitrator's decision must be in writing, signed by the arbitrator, and must include a brief summary of the basis for the decision.

5.5.4.6 Effect of Arbitrator's Decision

The parties agree to abide by the arbitrator's decision regarding a postponement of implementation in the state in which the decision applies until the decision expires. If the arbitrator's decision applies to more than one state, the decision will expire on a state by state basis. Unless the parties agree otherwise, the arbitrator's decision expires in a state when the first of any of the following occurs in that state:

- The regulatory or other authority from whom the CLEC has requested a postponement rules on the postponement request; or
- The dispute resolution proceeding initiated by the CLEC regarding the proposed change is dismissed, withdrawn, or otherwise concluded without a ruling on the CLEC's request for a postponement; or
- Any regulatory or other authority orders otherwise at the request of Qwest or the CLEC.

The arbitrator's decision regarding postponement of implementation is not binding precedent and shall have no precedential or persuasive value. The parties shall not cite or present the content of any arbitrator's decision as having precedential or persuasive value.

5.5.4.7 Arbitration Costs

Each party shall bear the costs it incurs in preparing and presenting its own case. The party against whom the issue is decided shall pay the costs for the arbitrator.

5.6 Comparability of Change Request Treatment

When a CLEC or Qwest submits a Product/Process CR in CMP, Sections 5.3 and 5.4, respectively, are applicable. While the processes contained in these sections are not identical, Qwest and the CLECs intend that the events and timeframes associated with Qwest and CLEC Product/Process CRs will be the same in all material respects for CRs that are comparable. Comparability of CRs is determined based on relative complexity, time for implementation and other relevant factors. The parties agree to periodically assess the time required to complete comparable CRs. To facilitate this assessment, Qwest will document the amount of time it takes to evaluate a Qwest originated Product/Process CR prior to CR submission to compare to

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the documented time it takes to evaluate a CLEC Product/Process CR. Evaluation time for Qwest Product/Process CRs shall include only activities similar to those Qwest performs for a CLEC originated Product/Process CR after CR submission until Qwest issues its final response.

5.7 Crossover Change Requests

During the operation of this CMP, there may be situations when systems CRs have requirements for product/process discussions or solutions, or when product/process CRs require System solutions. These crossover CR situations exist in three basic categories:

Category A. If a CR submitted to the product/process CMP is discovered to require a mechanized solution the following will occur:

- Qwest will open a new systems CR, on behalf of the original CR originator, with a reference to the product/process CR number
- Qwest will close the product/process CR with a reference to the new systems CR number
- The new systems CR will comply with the CMP OSS Interface CR process(See Section 5.1)

Category B. If a CR submitted to the Systems CMP is discovered to require a manual solution the following will occur:

- Qwest will open a product/process CR, on behalf of the original CR originator, with a reference to the systems CR number;
- Qwest will close the systems CR with a reference to the new product/process CR number.
- This CR will comply with the CMP product/process CR process.

Category C. If a CR submitted to the Systems CMP is discovered to require an interim manual solution, the CR will be tracked as a systems CR for the length of the CR lifecycle including the development and implementation of both the interim manual and final mechanized solutions. In these situations, Qwest will open a second systems CR with the same number as the original CR and a "MN" suffix.

The determination to close and open CRs as described above will be made by the CMP body at a Monthly CMP Product/Process Meeting.

If a CR becomes a crossover CR, Qwest may request an ad hoc clarification meeting with the CR originator or request that a portion of the appropriate Monthly CMP Meeting be devoted to discussing the CR. If a CR is closed in one CMP arena and opened in the other, the new CR will retain the status, where feasible, and the date submitted of the old, "closed" CR. Under no circumstances will the CR be restarted.

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All crossover CRs will be distinctly labeled in the Monthly CMP Meeting distribution packages and addressed as a separate item on the Monthly CMP Meeting agenda. All crossover CRs (including those closed in Categories A and B) will include the "X" designation identified in Section 5.9. All Regulatory and Industry Guideline CRs will be submitted as systems CRs and maintained in the Systems database until closure, or until they are deemed to require a manual process solution, at which point they will become product/process CRs.

5.8 Change Request Status Codes

The following status codes will be applied to Change Requests of all types (i.e., Regulatory, Industry Guideline, Qwest Originated, CLEC Originated). The status of the CR will be included in the interactive reports. CR status codes will not necessarily be assigned in the order set forth below, and not every status code will apply to every CR.

- Submitted - A CR is updated to Submitted status when Qwest's CMP Manager has formally acknowledged the CR. The CR remains in Submitted status until Qwest has conducted a clarification meeting with the originator.
- Clarification – A CR is updated to Clarification status once the clarification meeting has been held with the originator.
- Evaluation – A CR is updated to Evaluation status if the CR requires further investigation by Qwest.
- Presented – A CR is updated to Presented status after the originator has presented it at the Monthly CMP Meeting.
- Pending Prioritization – The Pending Prioritization status is only applicable to CRs for which the impacted OSS Interface requires prioritization (e.g. IMA). A CR is updated to Pending Prioritization status after it has been presented and is waiting for Prioritization.
- Prioritized - The Prioritized status is only applicable to CRs for which the impacted interface is an OSS Interface that requires prioritization (e.g., IMA). A CR is updated to Prioritized status once it has been presented for prioritization and the Prioritization Process (Section 10.2) has been completed.
- Packaged -- A CR is updated to Packaged status from Prioritized status if it is included in the packaging option chosen for the release. Design work is continued on change requests that have been packaged. CRs not updated to Packaged status (from Prioritized status) will revert to Pending Prioritization status.
- Development – A product/process CR is updated to a Development status when Qwest's response requires development of a new or revised process. A systems CR is updated to Development status when development begins for the next OSS Interface Release.
- CLEC Test – A CR is updated to the CLEC Test status upon the effective date of the change. CLECs have the ability to evaluate the effectiveness of Qwest's change and its implementation, provide feedback, and indicate whether further action is required. Through

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interaction between Qwest and the interested CLECs, a product/process Change as initially implemented may undergo modification. Depending on the magnitude of such modifications, it may be appropriate to return the CR to Development status. Problems found with newly deployed Systems changes will be handled in accordance with Production Support process as described in Section 12.0. Certain processes in Section 12.0 are also applicable to product/process changes. If no further action is required for a consecutive 60 day period, the status is updated to Completed, unless the parties agree otherwise.

- Completed – A CR is updated to Completed status when the CLECs and Qwest agree that no further action is required to fulfill the requirements of the CR.
- Denied – A CR is updated to Denied status when Qwest denies the CR.
- Deferred - A CR is updated to Deferred status if the originator does not intend to escalate or dispute the CR at the present time, but wants the ability to activate or close the CR at a later date.
- Pending Withdrawal – A CR is updated to a status of Pending Withdrawal when the originator requests that a CR be withdrawn from the CMP process. Change Requests with a status of Pending Withdrawal are reviewed at the appropriate Monthly CMP Meeting to determine if another party wishes to sponsor the CR.
- Withdrawn - The CR receives a Withdrawn status when the CR originator requests that the CR be withdrawn from the CMP and the CR is not sponsored by another party.

5.9 Change Request Designations

In certain circumstances CR numbers will require special suffix designations to identify certain characteristics. Suffixes include:

- "CM" - Changes to the CMP framework
- "DR" - Dispute Resolution Process invoked on a CR
- "ES" - Escalation Process invoked on a CR
- "EX" - Change being implemented utilizing the Exception process
- "IG" - Industry Guideline CR
- "MN" – CR for a manual workaround related to an OSS Interface Change Request
- "RG" - Regulatory CR
- "SC" - Change being implemented as an SCRP request
- "X" - Crossover CR

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6.0 OSS INTERFACE RELEASE CALENDAR

Qwest will provide a rolling 12 month OSS Interface Release calendar in the distribution package of the first scheduled Monthly CMP Systems Meeting of each quarter. The calendar will show Release schedules, for all OSS Interfaces within the scope of CMP starting in that quarter and for a total of 12 months in the future. The following schedule entries will be made available, when applicable:

- Name of OSS Interface
- Date for CMP CR Submission Cutoff (for prioritized OSS Interfaces)
- Date for issuing Draft Release Notes
- Date when Initial Notification for new OSS Interfaces will be issued
- Date when Initial Notification for OSS Interface retirements will be issued
- Date when comparable functionality for OSS Interface retirements will be available
- Date for issuing Initial or Draft Technical Specifications
- Comment cycle timeline
- Prioritization, packaging and commitment timeline (for prioritized OSS Interfaces)
- Date for issuing Final Technical Specifications
- Testing period
- Date for issuing Final Release Notes
- Planned Release Production Date
- Release sunset dates (as applicable)

The OSS Interface Release calendar will be posted on the CMP Web site as a stand-alone document.

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7.0 INTRODUCTION OF A NEW OSS INTERFACE

The process for introducing a new OSS Interface will be part of this CMP. Introduction of a new OSS Interface may include an application-to-application or a Graphical User Interface (GUI).

It is recognized that the planning cycle for a new OSS Interface, of any type, may be greater than the time originally allotted. In that case, discussions between CLECs and Qwest will be held prior to the announcement of the new OSS Interface.

With a new OSS Interface, CLECs and Qwest may define the scope of functionality introduced as part of the OSS Interface.

7.1 Introduction of a New Application-to-Application Interface

At least two hundred and seventy (270) calendar days in advance of the planned Release Production date of a new application-to-application interface, Qwest will issue a Release Notification, post the Preliminary Interface Implementation Plan on Qwest's Web site, and host a design and development meeting.

7.1.1 Initial Release Notification

The Initial Release Notification will include:

- Where practicable, the Release Announcement and Preliminary Interface Implementation Plan will include: Proposed functionality of the OSS Interface including whether the OSS Interface will replace an existing OSS Interface
- Proposed implementation timeline (e.g., milestone dates, CLEC/Qwest comment cycle)
- Proposed meeting date to review the Preliminary Interface Implementation Plan
- Exceptions to industry guidelines/standards, if applicable
- Planned Release Production Date

7.1.2 CLEC Comments to Initial Release Notification

CLECs have fourteen (14) calendar days from the Initial Release Notification to provide written comments/questions on the documentation. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

7.1.3 Qwest Response to CLEC Comments

Qwest will respond with written answers to all CLEC issues within twenty-one (21) calendar days after the Initial Release Notification.

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7.1.4 Preliminary Implementation Plan Review Meeting

Qwest will review CLEC comments and the implementation schedule at the Preliminary Implementation Plan Review Meeting no later than two hundred and forty-two (242) calendar days prior to the Release Production Date.

7.1.5 Draft Interface Technical Specifications

Qwest will issue a notification associated with draft interface Technical Specifications no later than one hundred twenty (120) calendar days prior to implementing the Release. In addition, Qwest will confirm the schedule for the walk through of Technical Specifications, CLEC comments, and Qwest response cycle.

The Draft Interface Technical Specification notification will include:

- Purpose
- Logistical information (including a conference line) for walk through
- Reference to draft Technical Specifications, or Web site
- Additional pertinent material
- CLEC Comment/Qwest Response cycle
- Draft connectivity and firewall rules
- Draft Test Plan

7.1.6 Walk Through of Draft Interface Technical Specifications

Qwest will sponsor a walk through, including the appropriate internal Subject Matter Experts (SMEs), between one-hundred and ten (110) calendar days prior to Release Production and one hundred and six (106) calendar days prior to the Release Production Date. A walk through will afford CLEC SMEs the opportunity to ask questions and discuss specific requirements with Qwest's technical team and will take as much of this period as is necessary to address CLECs' questions. CLECs are encouraged to invite their technical experts, systems architects, and designers, to attend the walk through.

Qwest will lead the review of Draft Interface Technical Specifications. Qwest technical experts will answer the CLEC SMEs' questions. Qwest will capture action items such as requests for further clarification. Qwest will follow-up on all action items.

7.1.7 CLEC Comments on Draft Interface Technical Specifications

If the CLEC identifies issues or requires clarification, the CLEC must send written comments/concerns to Qwest no later than one-hundred and four (104) calendar days prior to

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the Release Production Date. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

7.1.8 Qwest Response to CLEC Comments

Qwest will review and respond with written answers to all CLEC issues, comments/concerns and action items captured at the walk through, no later than one hundred (100) calendar days prior to the Release Production Date. The answers will be shared with all CLECs, unless the CLECs question(s) are marked proprietary. Any changes that may occur as a result of the responses will be distributed to all CLECs in the Final Interface Technical Specifications notification. The Final Interface Technical Specifications notification will include the description of any change(s) made as a result of CLEC comments. The change(s) will be reflected in the final Technical Specifications.

7.1.9 Final Interface Technical Specifications

Generally, no later than one hundred (100) calendar days prior to the Release Production Date of the new OSS Interface, Qwest will issue the Final Technical Specifications to CLECs via Web site posting and a CLEC notification.

The Final Interface Technical Specifications notification will include:

- Summary of changes from Qwest response to CLEC comments on Draft Technical Specifications
- If applicable, Indication of type of change (e.g., documentation change, business rule change, clarification change)
- Purpose
- Reference to Final Technical Specifications, or Web site
- Additional pertinent material
- Final Connectivity and Firewall Rules
- Final Test Plan (including Joint Testing Period)
- Final Release Production Date
- Qwest response to CLEC comments

The implementation timeline for the Release will not begin until Final Interface Technical Specifications are provided. Production Support type changes within the thirty (30) calendar day test window can occur without advance notification but will be posted within twenty four (24) hours of the change.

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7.2 Introduction of a New GUI

7.2.1 Initial Release Notification

Qwest will issue an Initial Release Notification no later than forty-five (45) calendar days in advance of the Release Production Date. This will include:

- Proposed functionality of the OSS Interface including whether the new OSS Interface will replace an existing OSS Interface.
- Implementation timeline (e.g., milestone dates, CLEC/Qwest comment cycle, GUI overview meeting date)
- Release Production Date
- Logistics for GUI Overview Meeting

7.2.2 Draft Release Notes

Qwest will issue a Draft Release Notes notification no later than twenty-eight (28) calendar days in advance of the planned Release Production Date of a new GUI. At a minimum, the notification will include:

- Draft User Guide
- How and When Training will be administered

7.2.3 GUI Overview Meeting

The GUI Overview meeting will be held no later than twenty-seven (27) calendar days prior to the Release Production Date. At the meeting, Qwest will present an overview of the new OSS Interface.

7.2.4 CLEC Comments

At least twenty-five (25) calendar days prior to the Release Production Date. CLECs must forward their written comments and concerns to Qwest. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

7.2.5 Qwest Response to CLEC Comments

Qwest will consider CLEC comments and respond with written answers as part of the Final Notification.

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7.2.6 Final Release Notes

Qwest will issue Final Release Notes notification no later than twenty-one (21) calendar days prior to the Release Production date. The notification will include:

- A summary of changes from the Draft Release Notes notification, including type of changes (e.g., documentation change, clarification, business rule change).
- Final User Guide
- Final Training information
- Final Release Production Date.
- Qwest response to CLEC comments

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

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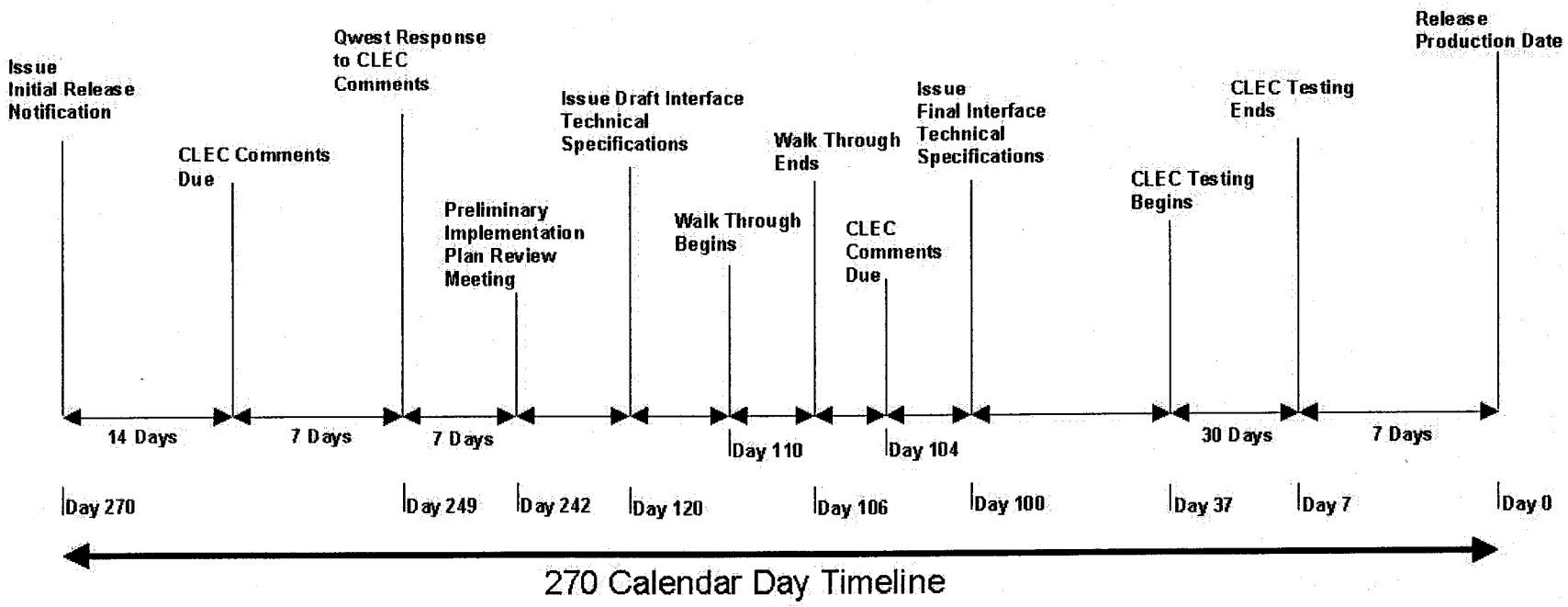
Qwest Wholesale Change Management Process Document –01-30-06

Figure 2: Introduction of a New Application-to-Application OSS Interface Timeline

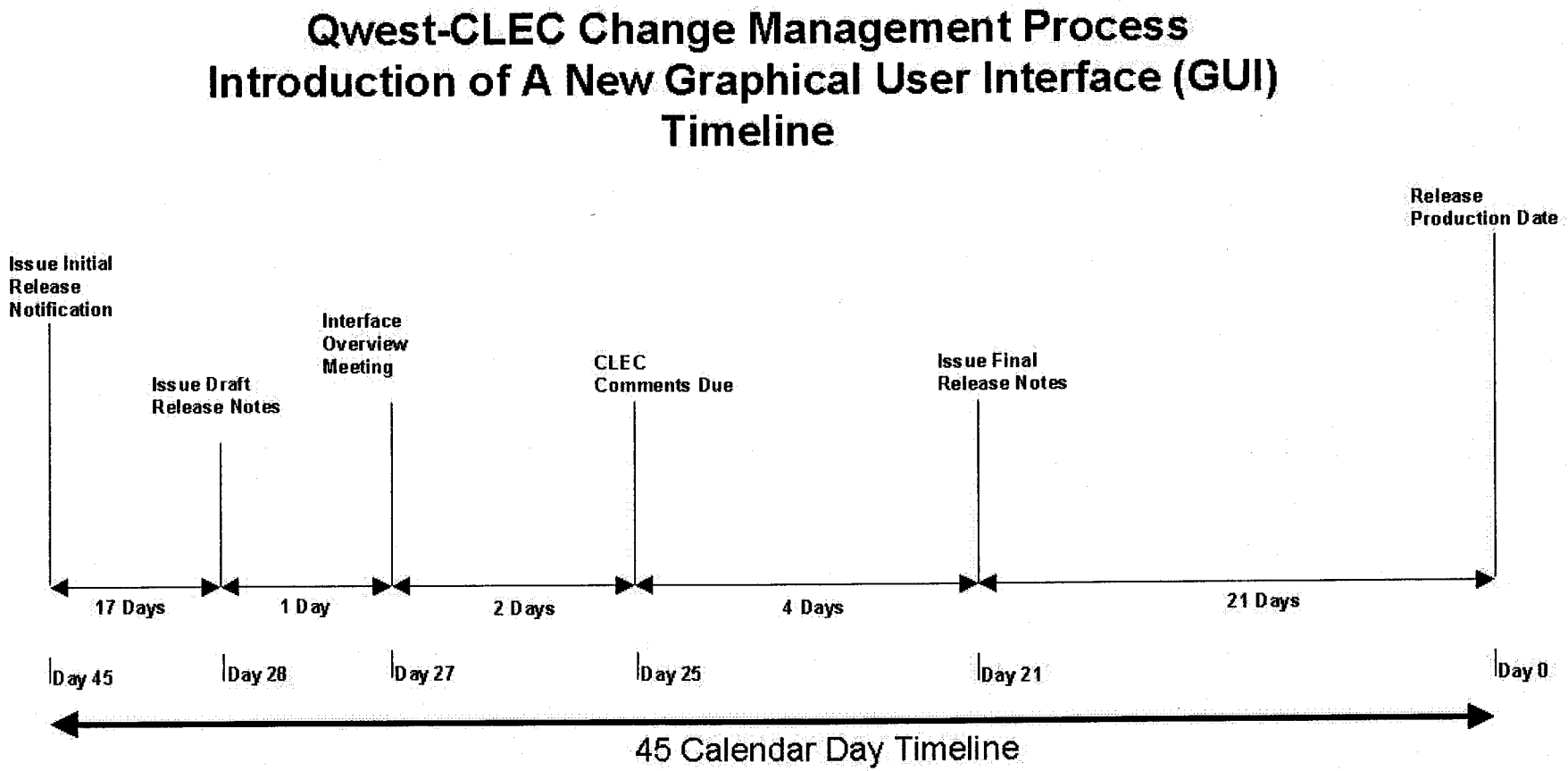
Qwest-CLEC Change Management Process
Introduction of A New Application-to-Application OSS Interface Timeline



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

Qwest Wholesale Change Management Process Document –01-30-06

Figure 3: Introduction of a New Graphical User Interface (GUI) Timeline



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

8.0 CHANGE TO AN EXISTING OSS INTERFACE

The process for changing an existing OSS Interface will be part of this CMP. Changes to an existing OSS Interface may include an application-to-application or a Graphical User Interface (GUI).

It is recognized that the planning cycle for a change to an OSS Interface, of any type, may be greater than the time originally allotted and that discussions between CLECs and Qwest may be held prior to the announcement of the change to the OSS Interface.

With a change to an OSS Interface, CLECs and Qwest may define the scope of functionality introduced as part of the OSS Interface.

Qwest standard operating practice is to implement three Major Releases and three Point Releases (for IMA only) within a calendar year. Unless mandated as a Regulatory Change, Qwest will implement no more than four (4) Releases per IMA OSS Interface requiring coding changes to the CLEC interfaces within a calendar year. Unless mandated as a Regulatory Change, the Major Release changes will occur no less than seventy-five (75) calendar days apart.

At a Monthly CMP Systems Meeting in the fourth quarter of each year, Qwest will communicate to the CLECs the Major Release schedule and hourly capacity of each release for the next calendar year. Qwest will subsequently issue a notification containing the same information. Qwest will attempt to provide this information prior to any prioritization scheduled during the fourth quarter.

Application-to-Application OSS Interface

Qwest will support the previous Major Release of Interconnect Mediated Access (IMA) EDI for one hundred eighty (180) calendar days after the subsequent Major Release of IMA EDI has been implemented. In the event that IMA EDI major releases are implemented more than six (6) months apart, any CLEC desiring to delay retirement of the previous release should submit a CR requesting the delay. Qwest will review and grant the retirement delay up until sixty (60) days after the Release Production Date of the next Major Release; however, Qwest will maintain no more than three (3) Major Releases of IMA EDI in production at any time. Qwest may retire the extended release before the extension expires when all CLECs have migrated off the extended release, but no earlier than five (5) business days after the last scheduled CLEC migration from the extended release. CLECs who do not successfully migrate from the retiring release, must contact their Qwest EDI Implementation Team immediately to schedule a new migration. Any such new migration shall not be rescheduled beyond the sixty (60) day

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retirement delay. (A timeline illustrating the operation of this provision is provided at the end of Section 8.) Past Releases of IMA EDI will only be modified as a result of production support changes. When such production support changes are made, Qwest will also modify the related documentation. All other changes become candidates for future IMA EDI Releases.

Qwest makes one Release of the Electronic Bonding-Trouble Administration (EBTA) and billing interfaces available at any given time, and will not support any previous Releases.

Graphical User Interface (GUI)

Qwest makes one Release of a GUI available at any given time and will not support any previous Releases.

IMA GUI changes for a pre-order or ordering will be implemented at the same time as an IMA EDI Release.

8.1 Application-to-Application Interface

This section describes the timelines that Qwest, and any CLEC choosing to implement on the Qwest Release Production Date, will adhere to in changing existing application-to-application interfaces.[1] For any CLEC not choosing to implement on the Qwest Release Production Date, Qwest and the CLEC will negotiate a mutually agreed to CLEC implementation timeline, including testing.

8.1.1 Draft Interface Technical Specifications

Prior to Qwest implementing a change to an existing application-to-application interface, Qwest will notify CLECs of the draft Technical Specifications. Qwest will issue draft Technical Specifications no later than seventy-three (73) calendar days prior to the implementation date unless an exception has been granted. Technical Specifications are documents that provide information the CLECs need to code the application-to-application interface. The Draft Technical Specifications notification letter will include:

- Written summary of change(s)
- Planned time frame for Release Production
- Purpose
- Logistical information (including a conference line) for walk through

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[1] For a CLEC converting from a prior release, the CLEC implementation date can be no earlier than the weekend after the Qwest Release Production Date, if production LSR conversion is required.

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Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

- Reference to draft Technical Specifications, or reference to a Web site with draft specifications
- Additional pertinent material
- Draft Technical Specifications documentation, or instructions on how to access the draft Technical Specifications documentation on the Web site.

8.1.2 Walk Through of Draft Interface Technical Specifications

Qwest will sponsor a walk through, including the appropriate internal Subject Matter Experts (SMEs), between sixty-eight (68) calendar days prior to the planned implementation date and fifty-eight (58) calendar days prior to the planned implementation date. A walk through will afford CLEC SMEs the opportunity to ask questions and discuss specific requirements with Qwest's technical team and will take as much of this period as is necessary to address CLECs' questions. CLECs are encouraged to invite their technical experts, systems architects, and designers, to attend the walk through.

Qwest will lead the review of the Draft Technical Specifications. Qwest technical experts will answer the CLEC SMEs' questions. Qwest will capture action items such as requests for further clarification. Qwest will follow-up on all action items and notify CLECs of responses forty five (45) calendar days prior to the planned implementation date.

8.1.3 CLEC Comments on Draft Interface Technical Specifications

If the CLEC identifies issues or requires clarification, the CLEC must send written comments to Qwest no later than fifty-five (55) calendar days prior to the planned implementation date. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

8.1.4 Qwest Response to CLEC Comments

Qwest will review and respond with written answers to all CLEC issues, comments/concerns no later than forty-five (45) calendar days prior to final implementation date. The answers will be shared with all CLECs, unless the CLECs question(s) are marked proprietary. Any changes that may occur as a result of the responses will be distributed to all CLECs in the same notification letter. The notification will include the description of any change(s) made as a result of CLEC comments. The change(s) will be reflected in the Final Technical Specifications.

8.1.5 Final Interface Technical Specifications

The Final Interface Technical Specifications will include the following:

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- Reference to Final Technical Specifications, or Web site
- Qwest response to CLEC comments
- Summary of changes from the prior implementation, including any changes made as a result of CLEC comments on Draft Technical Specifications
- Indication of type of change (e.g., documentation change, business rule change, clarification change)
- Final Joint Test Plan including transactions which have changed
- The suite of re-certification test scenarios
- Joint Testing Period
- Final implementation date

Qwest will issue Final Interface Technical Specifications no later than forty-five (45) calendar days before the final implementation date, unless the exception process has been invoked. The implementation timeline for the Release will not begin until Final Technical Specifications are provided. Production Support type of changes that occur within the thirty (30) calendar day test window can occur without advance notification but will be posted within 24 hours of the change.

8.1.6 Joint Testing Period

Qwest will provide a thirty (30) day test window for any CLEC who desires to jointly test with Qwest prior to the Release Production Date.

8.1.7 Release Documentation Addenda

After the Final Technical Specifications are published, there may be other changes made to documentation or the coding that is documented in the form of addenda.

- 1st Addendum – 2 weeks after the Release the 1st addendum is sent to the CLECs, if needed.
- Subsequent Addendum's – Subsequent addendum's are sent to the CLECs after the Release Production Date as needed. There is no current process and timeline.
- EDI CLECs –one hundred eighty (180) calendar days after the Release those CLECs using EDI are required to cut over to the new Release. CLECs are not required to support all new Releases.

8.2 Graphical User Interface (GUI)

8.2.1 Draft GUI Release Notes

Prior to implementation of a change to an existing GUI, Qwest will notify CLECs of the Draft GUI Release Notes and the planned Release Production Date.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

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Notification will occur no later than twenty-eight (28) calendar days prior to the planned Release Production Date unless an exception has been granted. This notification will include draft user guide information if necessary.

The notification will contain:

- Written summary of change(s)
- Planned time frame for Release Production
- Any cross-reference to draft documentation such as the user guide or revised user guide pages.

8.2.2 CLEC Comments on Draft Interface Release Notification

CLECs must provide comments/questions on the Draft GUI Release Notes no less than twenty-five (25) calendar days prior to the planned Release Production Date. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html or via an e-mail to cmpcomm@qwest.com.

8.2.3 Qwest Response to Comments

Qwest will consider CLEC comments and will address them in the Final GUI Release Notification no later than twenty one (21) calendar days before the Release Production Date.

8.2.4 Content of Final Interface Release Notification

The Final Interface Release Notification, will include:

- Final notification letter
- Summary of changes from draft GUI Release notification
- Final user guide (or revised pages)
- Final Release Production Date
- Qwest Response to CLEC comments

Qwest will issue the Final Interface Release Notification no later than twenty-one (21) calendar days before the final Release Production Date. Qwest will post this information on the CMP Web site. Production support type changes that occur without advance notification will be posted within 24 hours of the change. The implementation timeline for the Release will not begin until all related documentation is provided.

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Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

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Figure 4: Release Extension Illustrative Timeline

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

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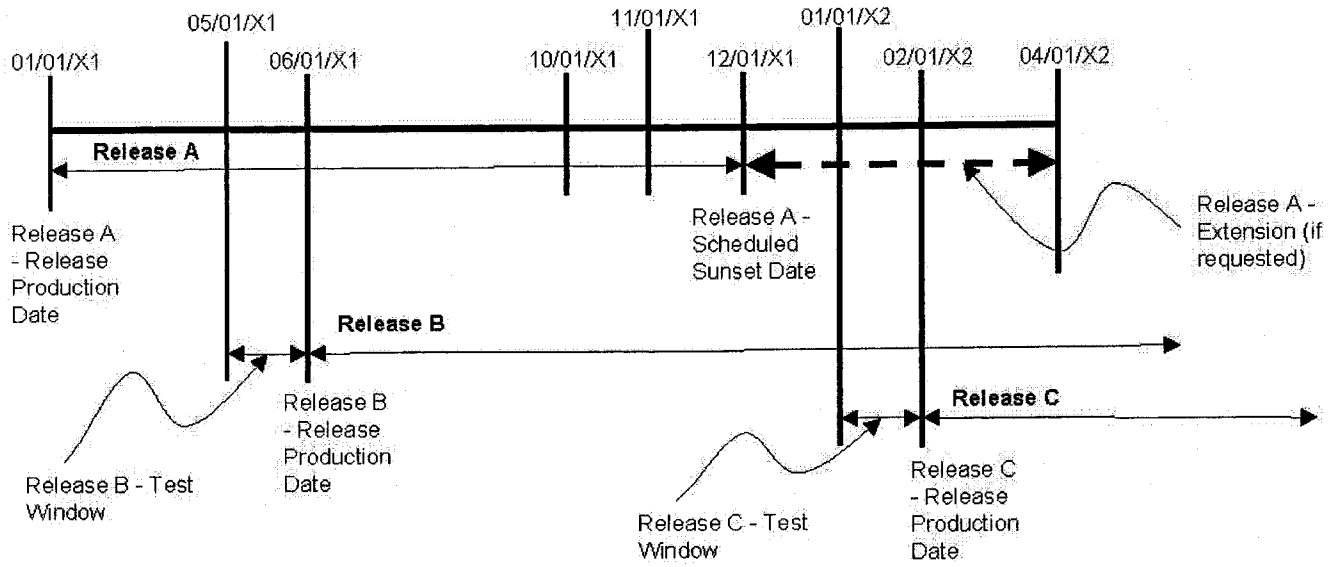
Qwest-CLEC Change Management Process
Change to an Existing OSS Interface
Release Extension Illustrative Timeline



Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

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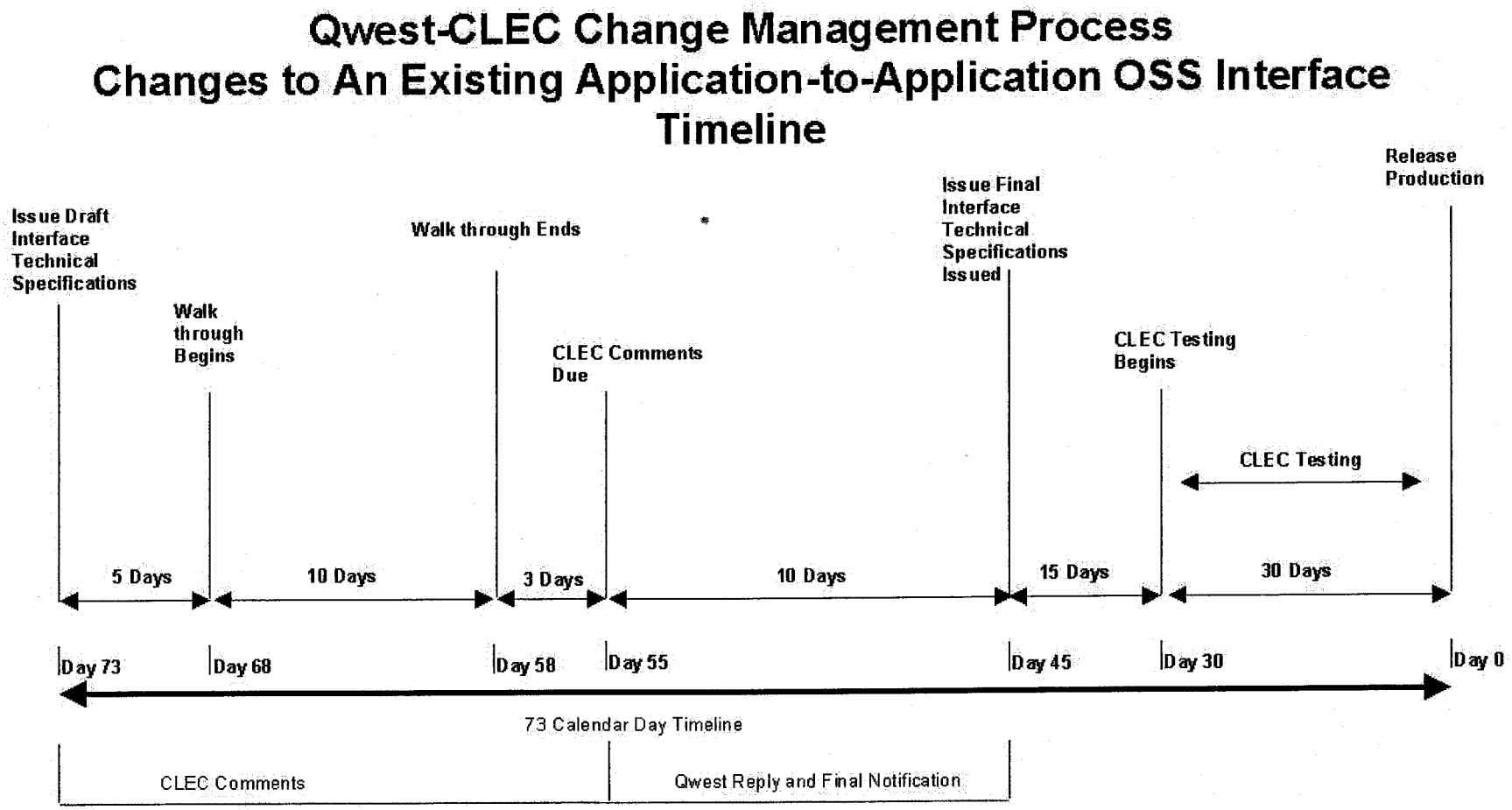
Qwest Wholesale Change Management Process Document –01-30-06

Figure 5: Changes to an Existing Application-to-Application OSS Interface Timeline

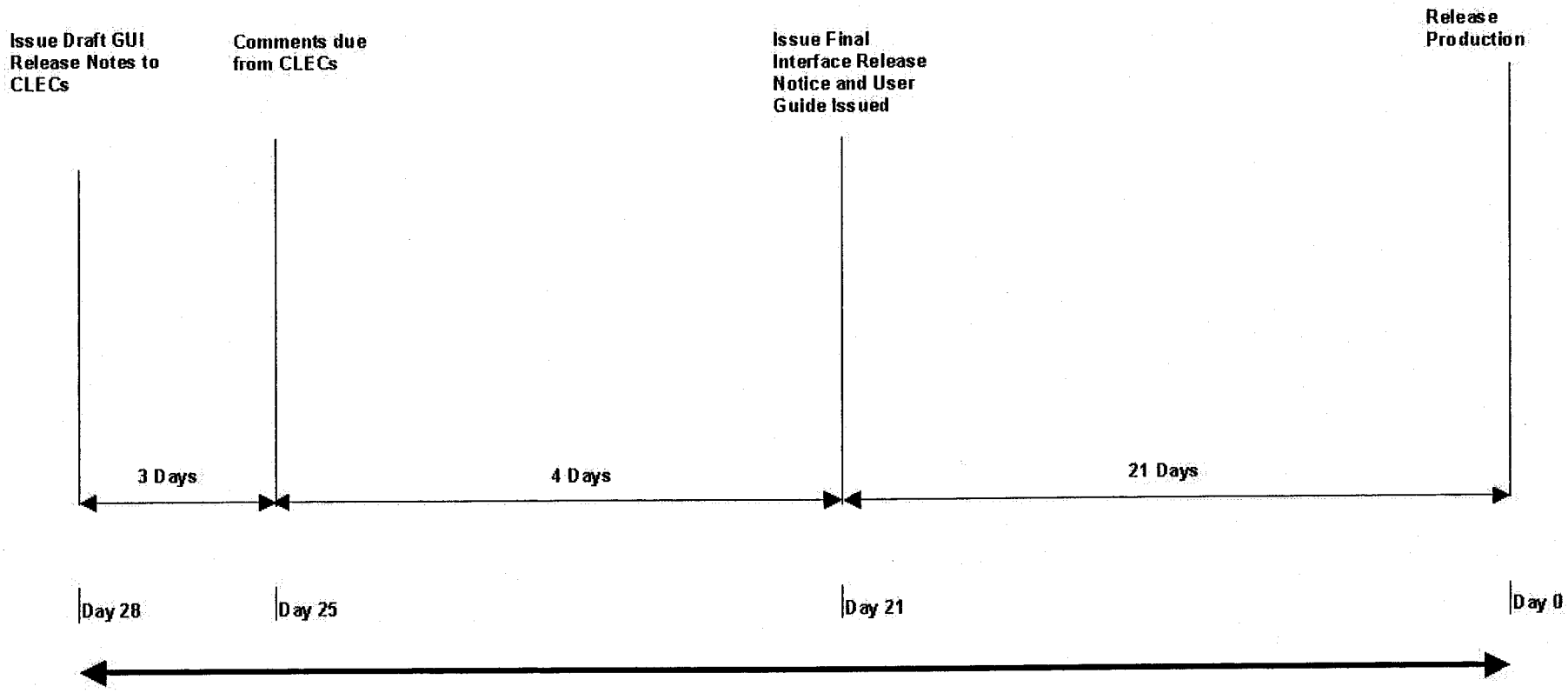


The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

Qwest Wholesale Change Management Process Document –01-30-06

Figure 6: Changes to An Existing Graphical User Interface (GUI) Timeline

Qwest-CLEC Change Management Process
Changes to An Existing Graphic User Interface (GUI) Timeline



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

9.0 RETIREMENT OF AN EXISTING OSS INTERFACE

The retirement of an existing OSS Interface occurs when Qwest ceases to accept transactions using a specific OSS Interface. This may include the removal of a GUI or a protocol transmission of information (Application-to-Application) interface.

9.1 Application-to-Application OSS Interface

9.1.1 Initial Retirement Notification

At least two hundred seventy (270) calendar days before the retirement date of application-to-application interfaces, Qwest will share the retirement plans via Web site posting and CLEC notification. The scheduled new application-to-application interface is to be in a CLEC certified production Release prior to the retirement date of the older interface.

Alternatively, Qwest may choose to retire an interface if there is no CLEC usage of that interface for the most recent ninety (90) consecutive calendar days. Qwest will provide thirty (30) calendar day notification of the retirement via Web posting and CLEC notification.

Qwest will issue the initial Retirement Notification no later than two hundred seventy (270) calendar days before retirement. The Initial Retirement Notification will include:

- The rationale for retiring the OSS Interface
- Available alternative interface options for existing functionality
- The proposed detailed retirement timeline (e.g., milestone dates, CLEC-Qwest comment and response cycle)
- Planned retirement date

9.1.2 CLEC Comments to Initial Retirement Notification

CLEC comments on the Initial Retirement Notification are due to Qwest no later than fifteen (15) calendar days following the Initial Retirement Notification. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

9.1.3 Qwest Response to Comments

Qwest will consider CLEC comments and respond in the Final Retirement Notification.

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

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9.1.4 Final Retirement Notification

The Final Retirement Notification will be provided to CLECs no later than two-hundred and twenty-eight (228) calendar days prior to the retirement date of the application-to-application interface. The Final Retirement Notification will contain:

- The rationale for retiring the OSS Interface (e.g., no usage or replacement)
- If applicable, where the replacement functionality will reside in a new interface and when the new interface has been certified by a CLEC
- Qwest's responses to CLECs' comments/concerns
- Actual retirement date

9.1.5 Comparable Functionality

Unless otherwise agreed to by Qwest and a CLEC user, when Qwest issues the Initial Retirement Notification the retirement of an interface for which a comparable interface does or will exist, a CLEC user will not be permitted to commence building to the retiring interface. CLEC users of the retiring interface will be grandfathered until the retirement of the interface. Qwest will ensure that an interface with comparable functionality is available no later than one hundred and eighty (180) calendar days prior to retirement of an Application-to-Application interface.

9.2 Graphical User Interface (GUI)

9.2.1 Initial Retirement Notification

At least sixty (60) calendar days in advance of the retirement date of a GUI, Qwest will share the retirement plans via Web site posting and CLEC notification. The scheduled new interface is to be in a CLEC certified production Release prior to the retirement of the older interface.

Alternatively, Qwest may choose to retire a GUI if there is no CLEC usage of that interface for the most recent ninety (90) consecutive calendar days. Qwest will provide thirty (30) calendar day notification of the retirement via Web posting and CLEC notification.

Initial Retirement Notification will include:

- The rationale for retiring the OSS Interface
- Available alternative interface options for existing functionality
- The proposed detailed retirement timeline (e.g., milestone dates, CLEC-Qwest comment and response cycle)
- Planned retirement date

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

9.2.2 CLEC Comments to Initial Retirement Notification

CLEC comments to the Initial Retirement Notification are due to Qwest no later than fifteen (15) calendar days following the Initial Retirement Notification. CLECs may submit comments via the Qwest CMP comment Web site at http://www.qwest.com/wholesale/cmp/comment.html.

9.2.3 Qwest Response to Comments

Qwest will consider CLEC comments and respond in the Final Release Notification.

9.2.4 Comparable Functionality

Qwest will ensure comparable functionality no later than thirty-one (31) days before retirement of a GUI.

9.2.5 Final Retirement Notification

The Final Retirement Notification, for GUI retirements, will be provided to CLECs no later than twenty-one (21) calendar days before the retirement date. The Final Retirement Notification will contain:

- The rationale for retiring the OSS Interface (e.g., no usage or replacement)
- If applicable, where the replacement functionality will reside in a new interface and when the new interface has been certified by a CLEC
- Qwest's responses to CLECs' comments/concerns
- Actual retirement date

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

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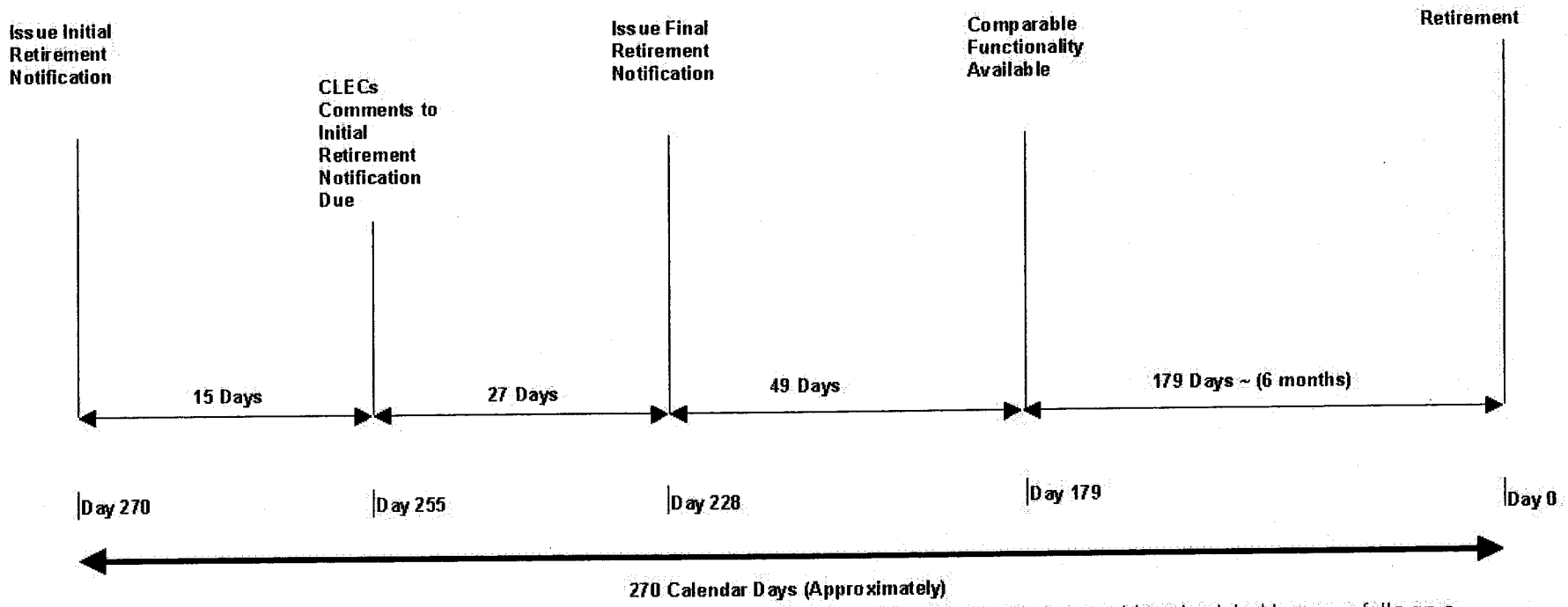
Qwest Wholesale Change Management Process Document –01-30-06

Figure 7: Retirement of an Existing Application-to-Application OSS Interface Timline

Qwest-CLEC Change Management Process
Retirement of An Existing Application-to-Application OSS Interface Timeline

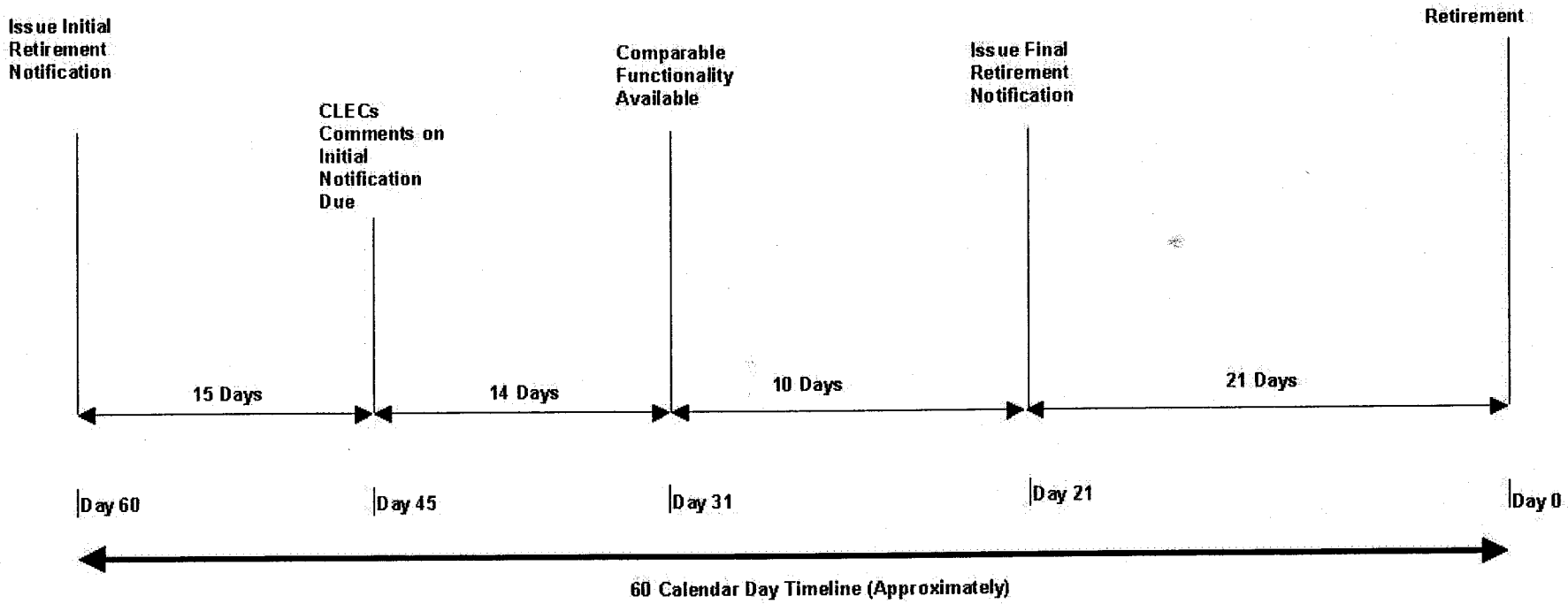


The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

Qwest Wholesale Change Management Process Document –01-30-06

Figure 8: Retirement of an Existing Graphic User Interface Timeline

Qwest-CLEC Change Management Process Retirement of An Existing Graphic User Interface Timeline



The events listed above are intended to occur on business days. If the date on which any event is scheduled to occur falls on a weekend or holiday, then Qwest and the CLECs may negotiate a revised timeline.

10.0 PRIORITIZATION

Each OSS Interface Release is prioritized separately. If the Systems CMP Change Requests for any interface do not exceed Release capacity, no prioritization for that Release is required. The prioritization process provides an opportunity for CLECs and Qwest to prioritize OSS Interface Change Requests (CRs). CRs for introduction of a new interface or retirement of an existing interface are not subject to prioritization and will follow the introduction or retirement processes outlined in Sections 7.0 and 9.0, respectively.

10.1 Test Environment Releases

When an OSS Interface release is prioritized, some of the prioritized OSS Interface CRs will cause a change in that OSS Interface's corresponding test environment. These changes will be included in the test environment release that is made available thirty (30) days prior to the OSS Interface implementation date, and will not be subject to prioritization. The business and systems requirements for these test environment changes will be developed in the same order as the prioritized OSS Interface CRs. Qwest will ensure that the resources allocated to the test environment are sufficient to complete the corresponding OSS Interface Release changes described above.

Any remaining test environment capacity will be allocated to CRs that are specific to the test environment. CRs that are specific to the test environment will be prioritized in accordance with Section 10.0.

Qwest's OSS Interface production environment and test environment development efforts will not compete for resources.

10.2 Regulatory Change Requests

Regulatory changes, are defined in Section 4.0. Separate procedures are required for prioritization of CRs requesting Regulatory changes to ensure that Qwest can comply with the recommended or required implementation date, if any. The process for determining whether a CR is a Regulatory Change is set forth in Section 5.1.

Qwest will send CLECs a notification when it posts Regulatory CRs to the Web and identify when comments are due, as described in Section 5.1. Regulatory CRs will also be identified in the Monthly CMP Systems Meeting distribution package.

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10.2.1 Regulatory Changes

For Regulatory Changes, Qwest will implement changes no later than the time specified in the legislation, regulatory requirement, or court ruling. If no time is specified, Qwest will implement the change as soon as practicable.

Regulatory CRs will be ranked with all other CRs. If the implementation date for a Regulatory CR requires all or a part of the change to be included in the upcoming Major Release, the CR will not be subject to ranking and will be automatically included in that Major Release.

10.2.2 Industry Guideline Changes

Industry Guideline CRs will be identified in the Monthly CMP Systems Meeting distribution package. Industry Guideline CRs will be ranked with all other systems CRs during prioritization as described in Section 10.0. If an Industry Guideline CR is prioritized high enough to be included in the business and systems requirements phase and is dependant on a "foundation" CR, the "foundation" CR will automatically be worked in conjunction with the Industry Guideline CR.

10.2.3 Regulatory Change Implementation

When more than one Major Release is scheduled before the mandated or recommended implementation date for a Regulatory CR, Qwest will present information to CLECs regarding any technical, practical, or development cycle considerations that may affect Qwest's ability to implement the CR in any particular Major Release as part of the CR review and continue to provide information up to the packaging options. At the Monthly CMP Systems Meeting where the Regulatory CR is presented, Qwest will advise CLECs of the possible scheduled Releases in which Qwest could implement the CR and the CLECs and Qwest will determine how to allocate those CRs among the available Major Releases, taking into account the information provided by Qwest regarding technical, practical, and/or development considerations. If the Regulatory CR is not included in a prior Release, it will be implemented in the latest Release specified by Qwest.

10.3 Prioritization Process

10.3.1 Prioritization Review

At the last Monthly CMP Systems Meeting before Prioritization, Qwest will facilitate a Prioritization Review including a discussion of all CRs eligible for prioritization in a Major Release. If there are any Industry Guideline CRs eligible for prioritization, Qwest will identify all

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Industry Guideline CRs that would need to be implemented prior to or in conjunction with such CRs. Qwest will distribute all materials five (5) calendar days prior to the Prioritization Review. The materials will include:

- Agenda
- Summary document of all CRs eligible for prioritization including identification of dependencies (see Appendix A - Sample – IMA 11.0 Rank Eligible CRs)

Both CLECs and Qwest will have appropriate Subject Matter Experts in attendance at the Prioritization Review. The review and discussion meetings are open to all CLECs.

The Prioritization Review objectives are to:

- Allow CLECs and Qwest to discuss eligible OSS Interface or test environment Change Requests by providing specific input as to the relative importance that CLECs, as a group, and Qwest assign to each such Change Request.

10.3.2 Ranking Process

Within three (3) business days following the Monthly CMP Systems Meeting that includes the Prioritization Review, Qwest will distribute the Prioritization Form for ranking. Ranking will be conducted according to the following guidelines:

- Each CLEC and Qwest may submit one completed Prioritization Form. The ranking must be submitted by a Point of Contact. The ranking will be submitted to the Qwest CMP Manager in accordance with the process described in Section 10.3.3 below. Refer to Appendix B: Sample – IMA 11.0 Initial Prioritization Form
- Qwest and each CLEC ranks each Change Request on the Prioritization Form by providing a point value from 1 through n, where n is the total quantity of CRs. The highest point value will be assigned to the CR that Qwest and CLECs wish to be implemented first. The total points will be calculated by the Qwest CMP Manager and the results will be distributed to the CLECs in accordance with the process described in Section 10.3.3 below. Refer to Appendix C : Sample – IMA 11.0 Prioritization List.

10.3.3 Ranking Tabulation Process

CLECs and Qwest who choose to vote must submit their completed Prioritization Form via e-mail, cmpcr@qwest.com, within three (3) business days following Qwest's distribution of the Prioritization Form. Within two (2) business days following the deadline for submission of ranking, Qwest will tabulate all rankings and e-mail the resulting Initial Prioritization List to the CLECs. The results will be announced at the next scheduled Monthly CMP Systems Meeting. Prioritization is based on the results of the votes received by the deadline. Based on the outcome of the final ranking of the CR candidates, an Initial Prioritization List is produced.

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10.3.4 Ranking of Late Added CRs

For those late added CRs that are eligible for inclusion, as a candidate, in the most recently prioritized Release, the prioritization process will be as follows.

- Within three (3) business days following the Monthly CMP Systems Meeting that resulted in the decision to include the late added CR as a candidate in the recently prioritized Release, Qwest will distribute the late added CR for ranking, along with the initial prioritization.
- Each CLEC and Qwest may submit a suggested rank for the late added CR. The suggested rank will be the number corresponding to the position on the Initial Prioritization List that the CLEC or Qwest believes the late added CR should be inserted.
- CLECs and Qwest who choose to vote must return their suggested rank for the late added CR via e-mail within three (3) business days following Qwest's distribution of the late added CR for ranking.

Within two (2) business days following the deadline for the return of the suggested rank, Qwest will tabulate the results by averaging the returned suggested ranks for the late added CR. Qwest will insert the late added CR into the Initial Prioritization List at the resulting point on the list and will renumber the remaining candidates on the list based on this insertion. Qwest will e-mail an updated Prioritization List to the CLECs. The results will be announced at the next scheduled Monthly CMP Systems Meeting.

10.3.5 Withdrawal of Prioritized CRs

A CLEC or Qwest may elect to withdraw a CR that has been prioritized for an OSS Interface Release. This process may be invoked at any time between the prioritization process and the commitment for the Release. Qwest will determine its ability to work additional CRs for the Release based upon the timing of the withdrawal request. After commitment, a CLEC or Qwest could request the CR be withdrawn, however, the withdrawal of the CR may not be feasible based upon the development status at the time of the withdrawal request. The process will be as follows:

- The originating CLEC or Qwest will submit an e-mail request to the Qwest CMP Manager, cmpcr@qwest.com, indicating that they wish to withdraw the CR. This e-mail must be sent no later than twenty one (21) calendar days prior to the Monthly CMP Systems Meeting at which the request will be discussed. The written request must contain:
  - the CR number
  - the CR title
  - an explanation of why the originator wishes to withdraw the CR
- Within two (2) business days after receipt of the request to withdraw the CR the CMP Manager will notify, in writing, all of the CLECs that submitted a prioritization ranking. The

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subject line will note "INTENT TO WITHDRAW PRIORITIZED CR [number]." The notification will include:

- the CR number
- the CR title,
- the ranking that it received from the prioritization,
- the explanation of why the originator wishes to withdraw the CR

- If a CLEC or Qwest disagrees with the withdrawal of the CR from the Release, they have the option to assume sponsorship of that CR. They may do so by notifying the CMP Manager, cmpcr@qwest.com, in writing of their intent to assume sponsorship of the CR within five (5) business days after the CMP Manager has sent the intent to withdraw e-mail. If the CMP Manager receives no response within five (5) business days, then the CR will be withdrawn. The new status will be reviewed in the next Monthly CMP Systems Meeting.

10.4 Special Change Request Process (SCRP)

In the event that a systems CR is not ranked high enough in prioritization for inclusion in the next Release, or as otherwise provided in this CMP, the CR originator may elect to invoke the CMP Special Change Request Process (SCRP) as described in this section. In the event that a carrier submits a CR after prioritization and wishes to invoke the SCRP, the originator may elect not to follow the Late Added CR process as defined in Section 10.3.4.

The SCRP does not supercede the process defined in Section 5.0 (Change Request Origination Process).

The foregoing process applies to Qwest and CLEC originated CRs. In the event a CR is submitted through the SCRP, Qwest agrees that it will not divert IT resources available to work on the CMP systems CRs, to support the SCRP request. Qwest will have to apply additional resources to, and track, the additional work required for the CR it seeks to implement through the SCRP.

All time intervals within which a response is required from one Party to another under this section are maximum time intervals. Each Party agrees that it will provide all responses in writing to the other Party as soon as the Party has the information and analysis required to respond, even if the time interval stated herein for a response is not over.

10.4.1 SCRP Request Form

To invoke the SCRP, the CR originator must send an e-mail to the Qwest CMP SCRP mailbox (cmpesc@qwest.com). The subject line of the e-mail message must include:

- "SCRP FORM"

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- CR number and title
- CR originator's company name

The text of the e-mail message must include:

- Description of the CR
- A completed SCRP Form (See Appendix E)
- A single point of contact for the SCRP request including:
  - Primary requestor's name and company
  - Phone number
  - E-mail address
- Circumstances which have necessitated the invocation of the SCRP
- Desired implementation date
- If more than one company is making the SCRP request, the names and point of contact information for the other requesting companies.

10.4.2 Qwest Acknowledges SCRP Request Receipt with a Confirmation E-mail

Within two (2) business days following receipt of the SCRP request e-mail, Qwest will acknowledge receipt of the complete SCRP request e-mail with a confirmation e-mail and advise the SCRP Requestor of any missing information needed for Qwest to process and analyze the request. When the SCRP request e-mail is complete, the SCRP confirmation e-mail will include:

- Date and time of receipt of complete SCRP request e-mail
- Date and time of SCRP confirmation e-mail
- SCRP title and number
- The name, telephone number and e-mail address of the assigned Qwest manager
- Amount of the non-refundable Processing Fee as specified in Section 10.4.8.

10.4.3 Process Fee Invoice

Within one (1) business day of sending the SCRP confirmation e-mail Qwest will bill the SCRP Requestor a non-refundable Processing Fee as specified in Section 10.4.8 below.

10.4.4 SCRP Review Meeting

Within ten (10) business days after the SCRP confirmation e-mail, Qwest will schedule and hold a review meeting with the SCRP Requestor to review Qwest's analysis of the request.

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10.4.5 Preliminary SCRP Quote and Review Meeting

During business and systems requirements analysis, Qwest will review the SCRP request to determine if it has any affinities with CRs packaged for the planned OSS Interface Release. As soon as feasible, but in any case within thirty (30) business days, after receipt of a completed SCRP request form, Qwest will schedule and hold a meeting with the SCRP Requestor to provide and review:

- An estimated Preliminary SCRP quote. The SCRP quote will, at a minimum, include the following information:
  - A description of the work to be performed
  - Estimated Development costs with a cap on cost
  - Targeted Release
  - An estimate of the terms and conditions surrounding the firm SCRP quote. (If the estimate increases before Qwest issues the Firm SCRP Quote, Qwest will communicate the cost increases to the SCRP Requestor.) The SCRP Requestor must comply with payment terms as outlined in Section 10.4.7 before Qwest proceeds with the request.
- An invoice covering the business and systems requirements analysis
  - Payment for this invoice is due no later than thirty (30) calendar days following Qwest's written issuance of the Preliminary SCRP Quote. Qwest will not proceed with further development in support of the SCRP Request until the business and systems analysis and processing invoices are paid.

10.4.5.1 SCRP Requestor Accepts the Preliminary Quote and Decision for Qwest to Proceed

The SCRP Requestor has ten (10) business days, upon receipt of the SCRP quote, to either agree to purchase under the quoted price or cancel the SCRP request.

If the SCRP Requestor accepts the SCRP Preliminary Quote, the SCRP Requestor must send an e-mail to the assigned Qwest manager with the following information:

The subject line of the e-mail message must include:

- "SCRP PRELIMINARY QUOTE ACCEPTED"
- CR number and title
- CR originator's company name

The text of the e-mail message must include:

- Statement accepting SCRP Preliminary Quote, planned OSS Interface Release date, and terms and conditions

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- CR originator's name, phone number, and e-mail address

10.4.5.2 SCRP Requestor Asks to Change the SCRP Request

If the SCRP Requestor decides to modify the SCRP request after Qwest provides the preliminary SCRP Quote, the SCRP requestor must submit a written request for change to the assigned Qwest manager. If changes are acceptable to Qwest, Qwest will notify the SCRP Requestor by e-mail within five (5) business days after receipt of such request for a change with a revised preliminary SCRP Quote, if applicable. The SCRP Requestor must inform Qwest, in writing, within five (5) business days, if the modified SCRP quote is acceptable, further changes are required, or the SCRP request is cancelled.

10.4.5.3 SCRP Requestor Cancels the SCRP Request

The last point at which a SCRP Request may be cancelled is at the Monthly CMP Meeting at which Qwest presents the CRs that Qwest has committed to in the Release. Otherwise, the SCRP request will be implemented with the Release and the SCRP Requestor is obligated to pay the full amount of the firm SCRP quote consistent with the payment schedule described below in Section 10.4.7.

10.4.6 Firm SCRP Quote and Review

Qwest will provide the SCRP Requestor a Firm SCRP Quote when Qwest commits CRs to the specific OSS Interface Release.

Qwest will send an e-mail to the SCRP Requestor with the following information:

- The subject line of the e-mail message must include:
  - "FIRM SCRP QUOTE"
  - CR number and title
  - CR originator's company name
- The text of the e-mail message must include:
  - Final SCRP quote and terms and conditions
  - Committed implementation date, or OSS Interface Release
  - Qwest contact name, phone number, and e-mail address

Qwest will schedule and hold a meeting to review the quote no less than ten (10) days following issuance of the Firm SCRP Quote. At this meeting Qwest will review the elements of the Firm Quote and the firm Release Date of the targeted Release.

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10.4.7 Payment Schedule

The SCRP Requestor must pay 50% of the Firm SCRP Quote no more than ten (10) calendar days following the scheduled Release date and the remaining 50% of the Firm SCRP Quote within thirty (30) calendar days after the scheduled Release date.

10.4.8 Applicable SCRP Charges

This section describes the different costs for a SCRP request.

- Processing Fee – a one-time flat fee that must be paid within thirty (30) calendar days after the Qwest-SCRP Review meeting to review the SCRP form. This fee is non-refundable and is treated separately from those charges for development and implementation as described under "Charges for the SCRP Request" below.
- Charges for Business and Systems Requirements - These charges include the costs of developing business and systems requirements.
- Charges for the Development of the SCRP Request – These charges, included in the Preliminary and Firm SCRP Quotes, including labor charges, time and capital costs incurred as a result of developing code and performing testing.

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11.0 APPLICATION-TO-APPLICATION INTERFACE TESTING

If a CLEC is using an application-to-application interface, the CLEC must work with Qwest to certify the business scenarios that CLEC will be using in order to ensure successful transaction processing in production. If multiple CLECs are using a service bureau provider, the service bureau provider need only be certified for the first participating CLEC; subsequent CLECs using the service bureau provider need not be re-certified. Qwest and CLEC shall mutually agree to the business scenarios for which CLEC requires certification. Certification will be granted for the specified Release of the application-to-application interface. If CLEC is certifying multiple products or services, CLEC has the option of certifying those products or services serially or in parallel if technically feasible.

New Releases of the application-to-application interface may require re-certification of some or all business scenarios. A determination as to the need for re-certification will be made by the Qwest coordinator in conjunction with the Release Manager of each Release. Notification of the need for re-certification will be provided to CLEC as the new Release is implemented. The suite of re-certification test scenarios will be provided to CLECs with the Final Technical Specifications. If CLEC is certifying multiple products or services, CLEC has the option of certifying those products or services serially or in parallel, if technically feasible. If multiple CLECs are using a service bureau provider, the service bureau provider need only be re-certified for the first participating CLEC; subsequent CLECs using the service bureau provider need not be re-certified.

Qwest provides a separate Customer Test Environment (CTE) for the testing of transaction based application-to-application interfaces for pre-order, order, and maintenance/repair. The CTE will be developed for each Major Release and updated for each Point Release that has changes that were disclosed but not implemented as part of the Major Release. Qwest will provide test files for batch/file interfaces (e.g., billing).

The CTE for Pre-order and Order currently includes:

- Stand Alone Test Environment (SATE)

The CTE for Maintenance and Repair currently includes:

- CMIP Interface Test Environment (MEDIACC)

Qwest provides Initial Implementation Testing, and Migration Testing (from one Release to the next) for all types of OSS Interface Change Requests. Such testing provides the opportunity to

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test the code associated with those OSS Interface exchange requests. The CTE will also provide the opportunity for regression testing of OSS Interface functionality.

11.1 Testing Process

Qwest will send an industry notification, including testing schedules (see Section 8.0 – Changes to Existing OSS Interfaces), to CLECs so they may determine their intent to participate in the test. CLECs wishing to test with Qwest must participate in at least one joint planning session and determine:

- Connectivity (required)
- Progression Testing (required)
- Controlled Production Testing (required)
- Production Turn-up (required)
- A test schedule (required) that reflects agreed upon dates for phases

A joint CLEC-Qwest test plan may also include some or all of the following based on type of testing requested:

- Requirements Review
- Test Data Development

Qwest will communicate any agreed upon changes to the test schedule. CLECs are responsible for establishing and maintaining connectivity to the CTE.

The CLEC should, in general, experience response times similar to production provided a CLEC uses the same software components and similar connectivity configuration in its test environment that it does in production. This environment is not intended for volume testing. The CTE contains the appropriate applications for pre-ordering and Local Service Request (LSR) ordering, including the service order processor. Production code problems identified in the test environment will be resolved by using the Production Support process as outlined in Section 12.0.

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12.0 PRODUCTION SUPPORT

12.1 Notification of Planned Outages

Planned Outages are reserved times for scheduled maintenance to OSS Interfaces. Qwest sends associated notifications to all CLECs. Planned Outage Notifications must include:

- Identification of the subject OSS Interface
- Description of the scheduled OSS Interface maintenance activity
- Impact to the CLECs (e.g., geographic area, products affected, system implications, and business implications)
- Scheduled date and scheduled start and stop times
- Work around, if applicable
- Qwest contact for more information on the scheduled OSS Interface maintenance activity

Planned Outage Notifications will be sent to CLECs and appropriate Qwest personnel no later than two (2) calendar days after the scheduling of the OSS Interface maintenance activity.

12.2 Newly Deployed OSS Interface Release

Following the Release Production Date of an OSS Interface change, Qwest will use production support procedures for maintenance of software as outlined below. Problems encountered by the user will be reported, if at all, to the IT Wholesale Systems Help Desk (IT Help Desk). Qwest will monitor, track, and address troubles reported by CLECs or identified by Qwest. Problems reported will be known as IT Trouble Tickets.

A week after the deployment of an IMA Release into production, Qwest will host a conference call with the CLECs to review any identified problems and answer any questions pertaining to the newly deployed software. Qwest will follow this CMP for documenting the meeting as described in Section 3.2. Issues will be addressed with specific CLECs and results/status will be reviewed at the next Monthly CMP Systems Meeting.

12.3 Request for a Production Support Change

The IT Help Desk supports CLECs who have questions regarding connectivity, outputs, and system outages. The IT Help Desk serves as the first point of contact for reporting trouble. If the IT Help Desk is unable to assist the CLEC, it will refer information to the proper Subject Matter Expert, also known as Tier 2 or Tier 3 support, who may call the CLEC directly. Often, however, an IT Help Desk representative will contact the CLEC to provide information or to confirm resolution of the trouble ticket.

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Qwest will assign each CLEC generated and Qwest generated IT Trouble ticket a Severity Level 1 to 4, as defined in Section 12.5. Severity 1 and Severity 2 IT trouble tickets will be implemented immediately by means of an emergency Release of process, software or documentation (known as a Patch). If Qwest and CLEC deem implementation is not timely, and a work around exists or can be developed, Qwest will implement the work around in the interim. Severity 3 and Severity 4 IT trouble tickets may be implemented when appropriate taking into consideration upcoming Patches, Major Releases and Point Releases and any synergies that exist with work being done in the upcoming Patches, Major Releases and Point Releases.

Qwest will attempt to make a software patch when the system is not working as defined in the technical specifications and/or the GUI systems documentation (excluding PCAT documentation), and issue an event notification clearly defining the change.

If Qwest determines that a software patch is not feasible, and/or Qwest or any CLEC identifies a Patch Release of software or related systems documentation changes that may impact CLEC production coding, Qwest will issue an event notification, initiate a Technical Escalation, and request a joint meeting between Qwest and the CLECs in order to discuss the particular Patch Release. Qwest will notify CLECs of the joint meeting in which Qwest will review the Patch Release, the proposed solution, and the variables which affect the resolution. In all instances, these joint meetings are exempt from the five (5) business day advance notification requirement described in Section 3.0.

At this joint meeting, Qwest and the impacted CLECs will discuss how the pending Patch Release will affect their code. Qwest and the impacted CLECs will discuss any potential resolution options and implementation timeframes. In the event that agreement cannot be reached between Qwest and the impacted CLECs regarding the type of Patch Release to be implemented, the parties will attempt to negotiate an appropriate workaround.

The first time a trouble is reported by Qwest or CLEC, the Qwest IT Help Desk will assign an IT Trouble Ticket tracking number, which will be communicated to the CLEC at the time the CLEC reports the trouble. The affected CLEC(s) and Qwest will attempt to reach agreement on resolution of the problem and closing of the IT Trouble Ticket. If no agreement is reached, any party may use the Technical Escalation Process, http://www.qwest.com/wholesale/systems/productionsupport.html. When the IT Trouble Ticket has been closed, Qwest will notify CLECs with one of the following disposition codes:

- No Trouble Found – to be used when Qwest investigation indicates that no trouble exists in Qwest systems.
- Trouble to be Resolved in Patch – to be used when the IT Trouble Ticket will be resolved in a Patch. Qwest will provide a date for implementation of the Patch. This is typically applied

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to Severity 1 and Severity 2 troubles, although Severity 3 and Severity 4 troubles may be resolved in a Patch where synergies exist.

- CLEC Should Submit CMP CR – to be used when Qwest's investigation indicates that the System is working pursuant to the Technical Specifications (unless the Technical Specifications are incorrect), and that the IT Trouble Ticket is requesting a systems change that should be submitted as a CMP CR.
- Resolved – to be used when the IT Trouble Ticket investigation has resolved the trouble.

If Qwest has identified the source of a problem for a Severity 3 or Severity 4 IT Trouble Ticket but has not scheduled the problem resolution, Qwest may place the trouble ticket into a "Date TBD" status, but will not close the trouble ticket. Once a trouble ticket is placed in "Date TBD" status, Qwest will no longer issue status notifications for the trouble ticket. Instead, Qwest will track "Date TBD" trouble tickets and report status of these trouble tickets on the CMP Web site and in the Monthly CMP Systems Meeting. When a "Date TBD" trouble ticket is scheduled to be resolved in a Patch, Release or otherwise, Qwest will issue a notification announcing that the trouble ticket will be resolved and remove the trouble ticket from the list reported on the CMP Web site and in the Monthly CMP Systems Meeting.

For "Date TBD" trouble tickets, either Qwest or a CLEC may originate a Change Request to correct the problem. (See Section 5.0 for CR Origination.) If the initiating party knows that the CR relates to a trouble ticket, it will identify the trouble ticket number on the CR.

Instances where Qwest or CLECs misinterpret Technical Specifications and/or business rules must be addressed on a case-by-case basis. All parties will take all reasonable steps to ensure that any disagreements regarding the interpretation of a new or modified OSS Interface are identified and resolved during the change management review of the Change Request.

12.4 Reporting Trouble to IT

Qwest will open a trouble ticket at the time the trouble is first reported by CLEC or detected by Qwest. The ITWSHD Tier 1 will communicate the ticket number to the CLEC at the time the trouble is reported. Once a trouble ticket is opened at the ITWSHD, a CLEC or Qwest may request that the Event Notification process begin on the ticket as described in section 12.6.

If a ticket has been opened, and subsequent to the ticket creation, CLECs call in on the same problem, and the ITWSHD recognizes that it is the same problem, a new ticket is not created. The ITWSHD documents each subsequent call in the primary IT trouble ticket.

If one or more CLECs call in on the same problem, but it is not recognized as the same problem, one or more tickets may be created. When the problem is recognized as the same, one of the tickets becomes the primary ticket, and the other tickets are linked to the primary

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ticket. The ITWSHD provides the primary ticket number to other reporting CLECs. A CLEC can request its ticket be linked to an already existing open IT ticket belonging to another CLEC. When the problem is closed, the primary and all related tickets will be closed.

12.4.1 Systems Problem Requiring a Workaround

If a CLEC is experiencing problems with Qwest because of a system "issue", the CLEC will report the trouble to the ITWSHD. The ITWSHD will create a trouble ticket as outlined above.

The ITWSHD Tier 1 will refer the ticket to the IT Tier 2 or 3 resolution process. If, during the resolution process, the Tier 2 or 3 resolution team determines that a workaround is required ITWSHD (with IT Tier 2 or 3 on the line, as appropriate) will contact the CLEC to develop an understanding of how the problem is impacting the CLEC. If requested and available, the CLEC will provide information regarding details of the problem, e.g., reject notices, LSRs, TNs or circuit numbers. Upon understanding the problem, the IT Tier 1 agent, with the CLEC on the line, will contact the ISC Help Desk and open a Call Center Database Ticket. The IT Tier 2 or 3 resolution team along with the WSD Tier 2 team, and other appropriate SMEs, (Resolution Team) will develop a proposed work around. The WSD Tier 2 team will work collaboratively with the CLEC(s) reporting the issue to finalize the work around. The ITWSHD will provide the CLEC and the WSD Tier 2 team with the IT Trouble Ticket number in order to cross-reference it with the Call Center Database Ticket. The ITWSHD will also record the Call Center Database Ticket number on the IT Trouble Ticket. The CLEC will provide both teams with primary contact information. If the CLEC and Qwest cannot agree upon the work around solution, the CLEC can use either the Technical Escalation process or escalate to the WSD Tiers, as appropriate. Qwest will use its best efforts to retain the CLEC's requested due dates, regardless of whether a work around is required.

12.5 Severity Levels

Severity level is a means of assessing and documenting the impact of the loss of functionality to CLEC(s) and impact to the CLEC's business. The severity level gives restoration or repair priority to problems causing the greatest impact to CLEC(s) or its business.

Guidelines for determining severity levels are listed below. Severity level may be determined by one or more of the listed bullet items under each Severity Level (the list is not exhaustive). Examples of some trouble ticket situations follow. Please keep in mind these are guidelines, and each situation is unique. The IT Help Desk representative, based on discussion with the CLEC, will make the determination of the severity level and will communicate the severity level to the CLEC at the time the CLEC reports the trouble. If the CLEC disagrees with the severity level assigned by the IT Help Desk personnel, either on the initial call or at any time while the

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ticket is open, a CLEC may request the ITWSHD to change the severity level, identifying the reason for the change in severity. If Qwest questions the validity of the change in severity, Qwest will contact the CLEC Severity Escalation Contact who raised the severity for clarification.

Severity 1: Critical Impact

- Critical.
- High visibility.
- A large number of orders or CLECs are affected.
- A single CLEC cannot submit its business transactions.
- Affects online commitment.
- Production or cycle stopped – priority batch commitment missed.
- Major impact on revenue.
- Major component not available for use.
- Many and/or major files lost.
- Major loss of functionality.
- Problem can not be bypassed.
- No viable or productive work around available.

Examples:

- Major network backbone outage without redundancy.
- Environmental problems causing multiple system failures.
- Large number of service or other work order commitments missed.
- A Software Defect in an edit which prevents any orders from being submitted.

Severity 2: Serious Impact

- Serious
- Moderate visibility
- Moderate to large number of CLECs, or orders affected
- Potentially affects online commitment
- Serious slow response times
- Serious loss of functionality
- Potentially affects production – potential miss of priority batch commitment
- Moderate impact on revenue
- Limited use of product or component
- Component continues to fail. Intermittently down for short periods, but repetitive
- Few or small files lost
- Problems may have a possible bypass; the bypass must be acceptable to CLECs

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- Major access down, but a partial backup exists

Examples:

- A single company, large number of orders impacted
- Frequent intermittent logoffs
- Service and/or other work order commitments delayed or missed

Severity 3: Moderate Impact

- Low to medium visibility
- Low CLEC, or low order impact
- Low impact on revenue
- Limited use of product or component
- Single CLEC device affected
- Minimal loss of functionality
- Problem may be bypassed; redundancy in place. Bypass must be acceptable to CLECs
- Automated workaround in place and known. Workaround must be acceptable to CLECs

Example:

- Hardware errors, no impact yet

Severity 4: Minimal Impact

- Low or no visibility
- No direct impact on CLEC
- Few functions impaired
- Problem can be bypassed; bypass must be acceptable to CLECs
- System resource low; no impact yet
- Preventative maintenance request

Examples:

- Misleading, unclear system messages causing confusion for users
- Device or software regularly has to be reset, but continues to work

12.6 Status Notification for IT Trouble Tickets

There are two types of status notifications for IT Trouble Tickets:

- Target Notifications: for tickets that relate to only one reporting CLEC – Target Notifications may be communicated by direct phone calls
- Event Notifications: for tickets that relate to more than one CLEC or for reported troubles that Qwest believes will impact more than on e CLEC

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- Event Notifications are sent by Qwest to all CLECs who subscribe to the IT Help Desk. Event Notifications will include ticket status (e.g., open, no change, resolved) and as much of the following information as is known to Qwest at the time the notification is sent:
  - Description of the problem
  - Impact to the CLECs (e.g., geographic area, products affected, business implications, other pertinent information available)
  - Estimated resolution date and time if known
  - Resolution if known
  - Severity level
  - Trouble ticket number(s), date and time
  - Work around if defined, including the Call Center Database Reference Ticket number
  - Qwest contact for more information on the problem
  - System affected
  - Escalation information as available

Both types of notifications will be sent to the CLECs and appropriate Qwest personnel within the time frame set forth in the table below and will include all related system trouble ticket number(s).

12.7 Notification Intervals

Qwest will distribute notifications during the IT Help Desk normal hours of operation (Monday-Friday 6:00 a.m. - 8:00 p.m. (MT) and Saturday 7:00 a.m. - 3:00 p.m. MT). Qwest will continue to work severity 1 problems outside of Help Desk hours of operation, and will communicate with the CLEC(s) as needed. A severity 2 problem may be worked outside the IT Help Desk normal hours of operation on a case-by-case basis.

Notification Intervals are based on the severity level of the ticket, the ticket's Disposition code (e.g., Initial, Update, Closure, etc.), and status changes.

The chart below indicates the response intervals a CLEC can expect to receive after reporting a trouble ticket to the IT Help Desk. Beginning with the issue's immediate acceptance as multi-CLEC impacting issue, Qwest will create and distribute the Initial notification.

Severity Level of Ticket	Response Interval for Status Changes	Response Interval for No Status Changes	Notification Interval upon Resolution
1	Within 1 hour	1 hour	Within 1 hour

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Severity Level of Ticket	Response Interval for Status Changes	Response Interval for No Status Changes		Notification Interval upon Resolution
2	Within 1 hour	1 hour		Within 1 hour
3	Within 4 hours	Workaround Provided	None. Only status ***changes*** will be communicated when a workaround is provided.	Within 4 hours
		No Workaround Provided	4 hours	
4	Within 24 hours	Workaround Provided	None. Only status ***changes*** will be communicated when a workaround is provided.	Within 4 hours
		No Workaround Provided	Every 48 hours.	

"Notification Interval for Any Change in Status" means that a notification will be sent out within the time specified from the time a change in status occurs. Qwest will provide updates to those notifications that do not have a workaround until a workaround is established to inform the CLEC that a the issue is still under investigation. Qwest will not issue Updates when Qwest has provided a Workaround, but no change in status has occurred. "Notification Interval upon Resolution" means that a notification will be sent out within the time specified from the resolution of the problem.

12.8 Process Production Support

Process troubles encountered by CLECs will be reported, if at all, to the ISC Help Desk (Tier 0). In some cases the Qwest Service Manager (Tier 3) may report the CLEC trouble to the ISC Help Desk. Tier 0 will open a Call Center Database Ticket for all reported troubles.

12.8.1 Reporting Trouble to the ISC

The ISC Help Desk (Tier 0) serves as the first point of contact for reporting troubles that appear process related. Qwest has seven Tiers in Wholesale Service Delivery (WSD) for process Production Support. References to escalation of process Production Support issues means

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escalation to one of these seven tiers. Contact information is available through the Service Manager (Tier 3). The Tiers in WSD are as follows:

- Tier 0 – ISC Help Desk
- Tier 1 – Customer Service Inquiry and Education (CSIE) Service Delivery Coordinator (SDC)
- Tier 2 – CSIE Center Coaches and Team Leaders, Duty Pager, Process Specialist
- Tier 3 - Service Manager
- Tier 4 – Senior Service Manager
- Tier 5 – Service Center Director
- Tier 6 – Service Center Senior Director

A CLEC may, at any point, escalate to any of the seven Tiers.

If a CLEC is experiencing troubles with Qwest because of a process issue, the CLEC will report the trouble to Tier 0. Tier 0 will attempt to resolve the trouble including determining whether the trouble is a process or systems issue. To facilitate this determination, upon request, the CLEC will provide, by facsimile or e-mail, documentation regarding details of the trouble, e.g., reject notices, LSRs, TNs or circuit numbers if available. Tier 0 will create a Call Center Database Ticket with a two (2) hour response commitment ("out in 2 hour" status), and provide the ticket number to the CLEC. If Tier 0 determines that the trouble is a systems issue, they will follow the process described in Section 12.8.4. With respect to whether the trouble is a systems or process issue, a CLEC may escalate to Tier 1 before the Tier 0 follows the process outlined in Section 12.8.4.

If Tier 0 does not determine that the trouble is a systems issue or is not able to resolve the trouble, Tier 0 will offer the CLEC the option of either a warm transfer to Tier 1 (with the CLEC on the line), or have Qwest place the Call Center Database Ticket into the Tier 1 work queue. Tier 1 will then analyze the ticket and attempt to resolve the trouble or determine if the trouble is a systems or a process issue. If the trouble is a process issue, Tier 1 will notify the Tier 2 process specialist. Tier 2 process specialist will notify all call handling centers (Tier 0, Tier 1 and Tier 2 at each center) of the reported trouble and current status. If Tier 1 determines that the trouble is a systems issue, they will follow the process described in Section 12.8.4.

The reporting CLEC(s) and Qwest will attempt to reach agreement on resolution of the trouble. This resolution includes identification of processes to handle affected orders reported by the CLEC and orders affected but not reported. If Qwest and the CLEC determine that the trouble can be resolved in a timely manner, Qwest will status the CLEC every 2 hours by telephone, unless otherwise agreed, until the trouble is resolved to the CLEC's satisfaction. If, at any point, the parties conclude that they are unable to resolve the trouble in a timely manner, the CLEC

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and Qwest will proceed to develop a work around, as described below. At any point, the reporting CLEC may elect to escalate the issue to a higher Tier.

Except in a work around situation, see Section 12.8.3, once the trouble is resolved and all affected orders have been identified and processed, Qwest will seek CLEC agreement to close the ticket(s). If agreement is not reached, CLEC may escalate through the remaining Tiers.

After ticket closure, if the CLEC indicates that the issue is not resolved, the CLEC contacts Tier 2 and refers to the applicable ticket number. Tier 2 reviews the closed ticket, opens a new ticket, and cross-references the closed ticket.

Qwest will use its best efforts to retain the CLEC's requested due dates.

12.8.2 Multiple Tickets

If one or more CLECs call in multiple tickets, but neither the CLECs nor Qwest recognize that the tickets stem from the same trouble, one or more tickets may be created.

Qwest will attempt to determine if multiple tickets are the result of the same process trouble. Also, after reporting a trouble to Tier 0, a CLEC may determine that the same problem exists for multiple orders and report the association to Tier 0. In either case, when the association is identified, Tier 0 will designate one ticket per CLEC as a primary ticket, cross-reference that CLEC's other tickets to its primary ticket and provide the primary ticket number to that CLEC. Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and Service Managers (Tier 3) of the issue.

Once a primary ticket is designated for a CLEC, the CLEC need not open additional trouble tickets for the same type of trouble. Any additional trouble of the same type encountered by the CLEC may be reported directly to Tier 2 with reference to the primary ticket number.

Qwest will also analyze the issue to determine if other CLECs are impacted by the trouble. If other CLECs are impacted by the trouble, within 3 business hours after this determination, the Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Managers (Tier 3) of the issue and the seven digit ticket number for the initial trouble ticket (Reference Ticket). At the same time, Qwest will also communicate information about the trouble, including the Reference Ticket number, to the impacted CLECs through the Event Notification process, as described in Section 12.6. If other CLECs experience a trouble that appears related to the Reference Ticket, the CLECs will open a trouble ticket with Tier 0 and provide the Reference Ticket number to assist in resolving the trouble.

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12.8.3 Work Arounds

The reporting CLEC(s) and Qwest will attempt to reach agreement on whether a workaround is required and, if so, the nature of the work around. For example, a work around will provide a means to process affected orders reported by the CLEC, orders affected but not reported, and any new orders that will be impacted by the trouble. If no agreement is reached, the CLEC may escalate through the remaining Tiers.

If a work around is developed, Tier 1 will advise the CLEC(s) and the Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Manager (Tier 3) of the work around and the Reference Ticket number. Tier 1 will communicate with the CLEC(s) during this affected order processing period in the manner and according to the notification timelines established in Section 12.8.1. After the work around has been implemented, Tier 1 will contact the CLECs who have open tickets to notify them that the work around has been implemented and seek concurrence with the CLECs that the Call Center Database tickets can be closed. The closed Reference Ticket will describe the work around process. The work around will remain in place until the trouble is resolved and all affected orders have been identified and processed.

Once the work around has been implemented, the associated tickets are closed. After ticket closure, CLEC may continue to use the work around. If issues arise, CLEC may contact Tier 2 directly, identifying the Reference Ticket number. If a different CLEC experiences a trouble that appears to require the same work around, that CLEC will open a Call Center Data base ticket with Tier 0 and provide the Reference Ticket number for the work around.

12.8.4 Transfer Issue from WSD to ITWSHD

CLECs may report issues to the ISC Help Desk (Tier 0) that are later determined to be systems issues. Once the ISC Help Desk or higher WSD Tier determines that the issue is the result of a system error, that Tier will contact the CLEC and ask if the CLEC would like that Tier to contact the ITWSHD to report the system trouble. If the CLEC so requests, the Tier agent will contact the ITWSHD, report the trouble and communicate the Call Center Database Ticket to the ITWSHD agent with the CLEC on the line. The ITWSHD agent will provide the CLEC and the WSD agent with the IT Trouble Ticket number. The IT Trouble Ticket will be processed in accordance with the Systems Production Support provisions of Section 12.0.

12.9 Communications

When Call Center Database and IT Trouble Tickets are open regarding the same trouble, the IT and WSD organizations will communicate as follows. The WSD Tier 2 Process Specialists will

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be informed of the status of IT Trouble Tickets through ITWSHD system Event Notifications. Additionally, WSD Tier 2 has direct contact with the ITWSHD as a participant on the Resolution Team, as necessary. As the circumstances warrant, the WSD Tier 2 process specialist will advise the call handling centers (Tier 0, Tier 1 and Tier 2 at each center) and the Service Manager (Tier 3) of the information pertinent to ongoing resolution of the trouble.

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13.0 TRAINING

Qwest will incorporate all substantive changes to existing Graphical User Interfaces (GUI), including the introduction of new GUI, into CLEC training programs. Qwest will execute CLEC training for pre-order, ordering, billing, and maintenance and repair GUIs.

13.1 Introduction of a New GUI

Qwest will include a CLEC training schedule with the Initial Release Notification for the introduction of a new GUI issued in accordance with the interval specified in Section 7.0. Qwest will make available CLEC training beginning no less than twenty-one (21) calendar days prior to the Release Production Date. Web based training will remain available for the life of the Release.

13.2 Changes to an Existing GUI

Qwest will include a CLEC training schedule with the Draft Release Notes issued for a change to an existing GUI in accordance with the interval specified in Section 8.0. Qwest will make available CLEC training beginning no less than twenty-one (21) calendar days prior to the Release Production date. Web based training will remain available for the life of the Release.

CEMR training will not be available before the Release Production Date but will be conducted for ninety (90) days in the live environment after the Release Production date.

13.3 Product and Process Introductions and Changes

Qwest may offer CLEC training for product and process introductions and changes based on the complexity of the introduction or change. This training is offered in many forms, but is most commonly offered in the following delivery methods: Web-based, instructor-led, job aids, or conference calls.

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14.0 ESCALATION PROCESS

14.1 Guidelines

- The Escalation Process will include items that are defined as within the CMP scope.
- The decision to escalate is left to the discretion of the CLEC, based on the severity of the missed or unaccepted response/resolution.
- Escalations may also involve issues related to CMP itself, including the administration of this CMP.
- The expectation is that escalation should occur only after Change Management procedures have occurred per this CMP.

14.2 Cycle

Item must be formally escalated through the CMP Web site, http://www.qwest.com/wholesale/cmp/escalations_dispute.html. Alternatively, the issue may be escalated by sending an e-mail to the Qwest CMP escalation e-mail address cmpesc@qwest.com.

- Subject line of the escalation e-mail must include:
  - CLEC Company name
  - "ESCALATION"
  - Change Request (CR) number and status, if applicable
- Content of e-mail must enclose appropriate supporting documentation, if applicable, and to the extent that the supporting documentation does not include the following information, the following must be provided:
  - Description of item being escalated
  - History of item
  - Reason for Escalation
  - Business need and impact
  - Desired CLEC resolution
  - CLEC contact information including Name, Title, Phone Number, and e-mail address
  - CLEC may request that impacted activities be stopped, continued or an interim solution be established.
- Qwest will acknowledge receipt of the complete escalation e-mail with an acknowledgement of the e-mail no later than the close of business of the following business day. If the escalation e-mail does not contain the preceding specified information Qwest will notify the CLEC by the close of business on the following business day, identifying and requesting information that was not originally included.
- When the escalation e-mail is complete, the acknowledgement e-mail will include:
  - Date and time of escalation receipt

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  - Date and time of acknowledgement e-mail
  - Name, phone number and e-mail address of the Qwest Director, or above, assigned to the escalation.
- Qwest will post escalated issue and any associated responses on the CMP Web site within one (1) business day of receipt of the complete escalation or response.
- Qwest will give notification that an escalation has been requested via the Industry Mail Out process
- Any other CLEC wishing to participate in the escalation may do so by selecting the participate button adjacent to the escalation on the CMP Escalation Web site, http://www.qwest.com/wholesale/cmp/escalations.html, within one (1) business day of the mail out. Alternately, a CLEC may participate by sending an e-mail to cmpesc@qwest.com within one business day of the Qwest notification. The subject line of the e-mail must include the title of the escalated issue followed by "ESCALATION PARTICIPATION."
- If Qwest determines a CLEC meeting is needed to further discuss the escalation, and upon agreement by the originating CLEC, Qwest will also invite the CLECs that chose to participate in the escalation. The meeting will not require 5 day advance notification due to the escalation time constraints.
- Qwest will respond to the originating CLEC and copy the participating CLECs, with a binding position e-mail including supporting rationale as soon as practicable, but no later than:
  - For escalated CRs, seven (7) calendar days after sending the acknowledgment e-mail,.
  - For all other escalations, fourteen (14) calendar days after sending the acknowledgment e-mail.
- The escalating CLEC will respond to Qwest within seven (7) calendar days with a binding position e-mail.
- When the escalation is closed, the resolution will be subject to this CMP

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15.0 DISPUTE RESOLUTION PROCESS

CLECs and Qwest will work together in good faith to resolve any issue brought before this CMP. In the event that an impasse issue develops, a party may pursue the dispute resolution processes set forth below:

- Item must be formally identified through the CMP Web site, http://www.qwest.com/wholesale/cmp/escalations_dispute.html. Alternately, a party may send an e-mail to the Qwest CMP Dispute Resolution e-mail address, cmpdisp@qwest.com. Subject line of the e-mail must include:
  - CLEC Company name
  - "Dispute Resolution"
  - Change Request (CR) number and status, if applicable
- Content of e-mail must include appropriate supporting documentation, if applicable, and to the extent that the supporting documentation does not include the following information, the following:
  - Description of item
  - History of item
  - Reason for Escalation
  - Business need and impact
  - Desired CLEC resolution
  - CLEC contact information including Name, Title, Phone Number, and e-mail address
  - Qwest will acknowledge receipt of the complete Dispute Resolution e-mail within one (1) business day
- Qwest or any CLEC may suggest that the issue be resolved through an Alternative Dispute Resolution (ADR) process, such as arbitration or mediation using the American Arbitration Association (AAA) or other rules. If the parties agree to use an ADR process and agree upon the process and rules to be used, including whether the results of the ADR process are binding, the dispute will be resolved through the agreed-upon ADR process.
- Without the necessity for a prior ADR Process, Qwest or any CLEC may submit the issue, following the commission's established procedures, with the appropriate regulatory agency requesting resolution of the dispute. This provision is not intended to change the scope of any regulatory agency's authority with regard to Qwest or the CLECs.

This process does not limit any party's right to seek remedies in a regulatory or legal arena at any time.

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16.0 EXCEPTION PROCESS

Qwest and CLECs recognize the need to allow occasional exceptions to this CMP described herein. Extenuating circumstances affecting Qwest or the CLECs may warrant deviation from this CMP. An exception request will be addressed on a case-by-case basis where Qwest and CLECs may decide to handle the exception request outside of the established CMP. An exception request must be presented to the CMP community for acceptance in accordance with this section to determine if the request shall be treated as an exception.

16.1 Exception Initiation and Acknowledgement

If Qwest or a CLEC wishes that any request within the scope of CMP be handled on an exception basis, the party who makes such a request will issue an exception request ("Exception Request"). Exception Requests will be submitted in one of two ways:

- If the request pertains to a single, previously submitted, open CR, the Exception Requestor must follow the process described in Section 16.1.1.
- If the Exception Request is not currently addressed in a single, previously submitted, open CR or if the request involves two or more previously submitted, open CRs, the Exception Requestor must complete a CR form and e-mail it to the CMP Manager, cmpcr@qwest.com. The Exception Requestor must complete the following sections of the CR form: date submitted, company, originator, proprietary (if applicable), optional available dates/times for meetings, area of request, description of exception requested. The description of the exception must contain the information listed in Section 16.1.1.

16.1.1 Requestor Submits an Exception Request

If the Exception Request pertains to a previously submitted CR, the Exception Requestor must send an e-mail to the CMP Manager, cmpcr@qwest.com, with "EXCEPTION" in the subject line. The text of the request must contain the following information:

- Change Request number(s) of an existing Change Request(s) or a completed Change Request form (See Section 5.0)
- Description of the request with good cause for seeking an exception
- A clear statement outlining the course of action the Exception Requestor wishes parties to follow and the desired outcome, if the Exception Request is granted (e.g., timeframe or targeted release)
- Supporting documentation
- Primary contact information

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- Whether the Requestor wishes to have the request considered at the next Monthly CMP Meeting, or requests an Exception Call/Meeting pursuant to Section 16.2 prior to the next Monthly CMP Meeting
- If a CLEC requests an Exception Call/Meeting, the CLEC should indicate whether it desires a pre-meeting with Qwest, including the CLEC's desire to have certain Qwest subject matter experts attend the pre-meeting and/or Exception Call/Meeting.

16.1.2 Tracking of an Exception Request

Exception Requests will be identified by adding the suffix "EX" to the CR number. If an Exception Request references existing CRs, and the Exception Request is granted, the CR numbers of the referenced CRs will then be modified to include the "EX" suffix.

Within one (1) business day after receipt of an Exception Request, Qwest's CMP Manager will acknowledge receipt of the Exception Request by e-mail to the Requestor. The CMP Manager will include in the acknowledgement an indication of whether an Exception Call/Meeting will be scheduled. If an Exception Call/Meeting is not requested, the Exception change request will be presented to the CMP community as described in Section 16.3 below. The acknowledgement will also include the CR or tracking number.

16.2 Exception Notification

Within three (3) business days after receipt of the request, if an Exception Call/Meeting is requested, the CMP Manager will issue a notification to the CMP community for an Exception Call/Meeting (the "Exception Notification"). The Exception Call/Meeting shall be held on a date agreed to by the Requestor, provided that it shall not be held less than seven (7) business days after issuance of the Exception Notification.

The subject line of the Exception Notification must include:

- "EXCEPTION NOTIFICATION"

The content of the Exception Notification will include:

- Requestor
- Logistics for Exception Call/Meeting
- Agenda
- Change Request number on which the exception is sought
- Description of the request with good cause for seeking an exception
- Desired outcome (e.g., timeframe or targeted release)
- Supporting documentation
- Primary contact information

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- A clear statement that a decision is required to accept, or decline this request as an Exception during this Exception Call/Meeting.
- Logistics for a pre-meeting, in accordance with Section 16.2.1
- An initial assessment from Qwest regarding the impact if the Exception Request is granted, if available.

16.2.1 Pre-Meeting

The pre-meeting shall be held on a date agreed to by the Requestor, provided that it shall not be held less than two (2) business days after issuance of the Exception Notification. Qwest shall conduct the pre-meeting with the Exception Requestor, any CLECs that wish to participate, Qwest SMEs, and specially requested Qwest personnel, or their equivalents. In all instances, the pre-meeting is exempt from the five (5) business day advance notification requirement described in Section 3.0. The purpose of the pre-meeting is to enable Qwest and CLECs to discuss options for the vote, determine the additional SMEs to invite to the Exception Call/Meeting, and develop a clear statement delineating what "Yes" and "No" votes will mean.

No later than three (3) business days following the pre-meeting, Qwest will distribute an Exception Voting Notification. The subject line of the notification will contain:

- "PRE-MEETING RESULTS – VOTING INSTRUCTIONS"

The body of the notification will contain:

- A clear statement outlining the course of action parties will follow if the Exception Request is granted
- A description of any modifications to the Exception Request made during the pre-meeting
- A clear statement delineating what "Yes" and "No" votes will mean
- Logistics for the Exception Meeting or the Monthly CMP Meeting, at which the vote will be held
- Logistics for additional pre-meetings, if applicable

16.2.2 Conduct Exception Call/Meeting

Qwest will conduct the Exception call/meeting to allow the Requestor to clarify the Exception Request. The Exception Requestor shall present the request and provide good cause as to why such a request should be treated as an exception. Qwest and CLECs present will be given the opportunity to comment on the request. Discussion may also include substantive issues and potential solutions, and schedules for subsequent activities (e.g., meeting, deliverables, milestones, and implementation dates). After the discussion, Qwest will conduct a vote as described in Section 16.4.

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Qwest will write, distribute and post minutes as part of the Exception Request Disposition Notification no later than five (5) business days after the Exception Call/Meeting. The minutes will include the disposition and schedule of the implementation of the Exception Request.

16.3 Notification of Exception Request Discussion and Vote at Upcoming Monthly CMP Meeting

If an Exception Requestor desires that the vote be taken at the next Monthly CMP Meeting, the Exception Request must be submitted no later than thirteen (13) business days prior to that Monthly CMP Meeting. If an Exception Call/Meeting is not requested by the Exception Requestor, within three (3) business days after receipt of the request Qwest will notify the CLECs by e-mail that an Exception Request has been received by the CMP Manager.

The subject line of the notification must include:

- "EXCEPTION NOTIFICATION"

The notification content shall include:

- Requestor
- Change Request number on which the exception is sought
- Description of the request with good cause for seeking an exception
- Desired outcome (e.g., timeframe or targeted release)
- Supporting documentation
- A clear statement that this request will be discussed and a decision is required to accept, or decline this request as an Exception, at the upcoming Monthly CMP Meeting
- Logistics for a pre-meeting, in accordance with Section 16.2.1
- An initial assessment from Qwest regarding the impact if the Exception Request is granted, if available

16.3.1 Discussion and Vote Taken at the Monthly CMP Meeting

If an Exception Call/Meeting is not requested, Qwest will note on the agenda of the next Monthly CMP Meeting that an Exception Request has been submitted, and that a decision is required to accept or decline this request as an Exception. Qwest will include the Exception Request and supporting documentation as part of the Monthly CMP Meeting distribution package.

The Exception Requestor shall present the request and provide good cause as to why such a request should be treated as an exception. Qwest and CLECs present will be given the opportunity to comment on the request. Discussion may also include substantive issues and potential solutions, and schedules for subsequent activities (e.g., meeting, deliverables, milestones, and

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implementation dates). After the discussion, Qwest will conduct a vote as described in Section 16.4.

16.4 Vote on Exception Request

A vote on whether an Exception Request will be handled on an exception basis will take place at the Exception Call/Meeting, if one is held (See Section 16.2.2). If an Exception Call/Meeting is not held, the vote will be taken at the Monthly CMP Meeting (See Section 16.3.1). The standards for determining whether a request will be handled on an exception basis are as follows:

- If the Exception Request is for a general change to the established CMP timelines for Product/Process changes, a two-thirds majority vote will be required unless Qwest or a CLEC demonstrates, with substantiating information, that one of the criteria for denial set forth in Section 5.3 is applicable. If one of the criteria for denial is applicable, the request will not be treated as an exception.
- If the Exception Request is for a Systems change or seeks to alter any part of this CMP (other than a particular instance of a Product/Process timeline change), a unanimous vote will be required.

Voting will be conducted pursuant to Section 17.0.

Any party that disagrees with results of a vote may initiate dispute resolution pursuant to the CMP Dispute Resolution provisions.

16.5 Exception Request Disposition Notification

Qwest will issue a disposition notification, including meeting minutes, within five (5) business days after the close of the Exception Call/Meeting, or the Monthly CMP Meeting, at which the vote was taken. The disposition notification will be posted on the Web site.

16.6 Processing of the Exception Disposition

If the outcome of the vote is to grant the Exception Request, then Qwest may proceed with the agreed to disposition. If the outcome of the vote is not to treat the proposed change as an Exception, the originator may withdraw the Exception designation and continue to pursue its change under the established CMP. The originator of the change may also withdraw the change and discontinue pursuit of the requested change.

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17.0 VOTING

When a vote is called, Qwest and CLECs will follow the procedures described below, unless otherwise specified in this CMP.

The Qwest CMP Manager will schedule and hold a discussion call/meeting (if not pursuant to a Monthly CMP Meeting), issue an agenda with any supporting material, and conduct the vote as described below on the open issue. The agenda will be distributed and posted on the web site in advance of the call/meeting as also described below.

The results of the vote will be published, using the voting tally form (refer to Appendix F).

A total of 51% or more of the votes in favor of (or against) a proposal shall constitute a Majority in this CMP.

The standard for the determination of all issues put to a vote under this CMP is the decision of the Majority, except where a different voting standard is expressly stated in this CMP for a particular issue.

17.1 Voter

A Voter is any of the POCs designated under Section 2.2. Additionally, any CLEC POC may designate another member of its company or a third party as an interim POC to vote, for a specific vote, in the absence of the primary, secondary, and tertiary POCs. A third party vote must be accompanied by one of the following two valid forms of documentation (e-mail authorization or Letter of Authorization (LOA)). The e-mail must be sent to the CMP Manager, cmpcr@qwest.com, no later than two (2) hours before the meeting at which the vote will take place. The interim POC may provide an LOA to Qwest at the meeting, prior to the vote.

If an e-mail or LOA is provided to designate a third party interim POC, it must contain the following information in the subject line of the e-mail:

- "Voting Proxy"

The body of the e-mail or LOA must contain the following information:

- CLEC Name
- Third Party Company Name
- Brief description of the issue on which the vote is being taken

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- Date vote call/meeting is scheduled to be held
- Signature of authorizing Carrier (LOA only)

If a meeting is scheduled for a vote but a vote is not taken, e-mailed designations or LOAs will be discarded.

17.2 Participation in the Vote

Any Carrier that is authorized to provide local services in any one of Qwest's 14-state region may qualify as a Voter.

A Voter may participate in the vote in person, over the phone, or via e-mail ballot, as described in Section 17.4.3.

17.2.1 A Carrier is Entitled To a Single Vote

Each Carrier (Qwest or CLEC) is entitled to a single vote regardless of any affiliates. For example, at the time of this writing, WorldCom has several entities offering local services throughout the Qwest region (e.g., MFS, Brooks Fiber, MCI Metro, etc.). WorldCom would be entitled to one vote for all of these affiliates.

17.3 Notification of Vote

Qwest will notify CLECs by email within one (1) business day after determining when a vote on a specific issue must occur. This notification will in no event be less than five (5) business days before the call. The subject line of notification will be identified as "VOTE REQUIRED/Title of Issue." Within one (1) business day after issuing the notification, the notification and any supporting material will be posted on the web site.

17.3.1 Notification Content

When a notification is issued, the notification will be issued as a CMP notification and will consist of:

- a description of the issue and reason for calling a vote
- date and time of the voting call/meeting
- bridge number for the voting call, or logistics for the meeting
- supporting material, if any
- the deadline date and time for submitting e-mail votes

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17.4 Voting Procedures

17.4.1 Quorum

At any CMP call/meeting where a vote is to be taken, a quorum of Carriers, as described in Section 17.2.1, (Qwest and CLEC) must be present. A quorum will be established as follows:

- Qwest and CLECs will determine the average number of Carriers (including Qwest) at the last six days of Monthly CMP Meetings, excluding the highest and lowest attendance numbers (e.g. add the number of Carriers at the remaining four meetings and divide by four) ("Average Number of Carriers").
- If 62.5% or more of the Average Number of Carriers is present, a quorum has been established. For purposes of establishing a quorum, a Carrier not participating in the meeting is considered present if it submitted an e-mail vote by the time designated in the notification of vote.
- When calculating the average number of Carriers and establishing quorum, Qwest will round to the nearest whole number; *i.e.,* Qwest will round a number ending in 0.5 and above to the higher whole number, and round a number ending below 0.5 to the lower whole number.

If a quorum is not present at a call/meeting when a vote is scheduled to be taken, the vote shall be postponed until such time as a quorum is established.

In the case of an Exception request, if a quorum is not established at the Exception all/Meeting, the vote shall be postponed for three (3) business days for a second Exception Call/Meeting. At the second Exception Call/Meeting, a vote will be taken regardless of whether a quorum is established. Prior to the second Exception Call/Meeting, Qwest will distribute a notification stating that at this meeting a vote will take place regardless of whether a quorum is established, and that votes will be accepted in accordance with Sections 17.1 and 17.4.1.

17.4.2 Casting Votes

Once a quorum is established, Qwest will ask for all Voters to place their vote by writing their vote and their company name on a piece of paper. The vote will be either a "Yes," "No" or "Abstain." When all companies have completed their votes, Qwest will collect the ballots. Voters attending by telephone will e-mail their vote to cmpcr@qwest.com, in accordance with Section 17.4.3. After collection of ballots Qwest will read aloud all votes received and collected. If a POC on the phone wishes to vote, but does not have access to a computer, Qwest will arrange with that POC a method to receive its vote. Only votes of "Yes" and "No" will count toward calculating a majority or unanimous decision.

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17.4.3 E-mail Ballots

CLECs wishing to e-mail their vote to Qwest may do so by sending an e-mail to the Qwest CMP Manager, cmpcr@qwest.com. E-mail votes will only be accepted, and included in the tally of the votes, if received prior to the official close of voting during the voting call/meeting.

The subject line of the e-mail must include the following:

- "CLEC BALLOT"
- CLEC Name
- Representative Name

The body of the e-mail must include the following:

- CLEC Name
- Representative Name
- Brief description of the issue on which the vote is being taken
- Date vote call/meeting is scheduled to be held
- CLEC vote

If a meeting is scheduled for a vote but a vote is not taken, e-mailed votes will be discarded. In addition, CLECs who submitted votes by e-mail will be notified that no vote was taken, their votes were discarded, and that the vote may be taken again at a later date.

In the event a CLEC is present to vote, after submitting an e-mail ballot, such CLEC may cast its vote at the call/meeting regardless of the e-mail ballot.

17.4.4 Voting Tally Form

The Voting Tally Form serves as a collective record of the individual company vote. The results of the tally will be included in the meeting minutes as an attached document.

The form will include the following information:

- *Name of Call/Meeting*: The name of the call/meeting
- *Date of Vote*: The date of occurrence
- *Subject*: The topic or issue that is causing the vote
- *Voting Carrier*: The Carrier's company name
- *Voting Participant*: Write the name of the Voter that participates in a 'vote' and how the vote was cast: in person, by phone or by email
- *Yes*: Place an 'X' in box if agreed with proposed plan
- *No*: Place an "X" in box if party disagrees with proposed plan

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- *Abstain*: Any participant may abstain to place a vote by placing an "X" in the box
- *Result*: Qwest shall record the results of the vote in this box

Qwest will announce the results of the vote, by an e-mail notification, no later than five (5) business days following the call/meeting. The result will be included in meeting minutes and posted on the web site.

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18.0 OVERSIGHT REVIEW PROCESS

Qwest or a CLEC may identify issues with this CMP using the Oversight Review Process. Issues submitted through this process may include:

- Improper notification under CMP
- No notification under CMP
- Issues regarding scope of CMP
- Failures to adhere to CMP
- Interpretations of CMP
- Gaps in CMP

This Oversight Review Process is optional. It will not be used when one or more processes documented in this CMP are available to obtain the resolution the submitter desires. The submitter is expected to use such available processes. If a submitter chooses to use this process, the following applies.

18.1 Guidelines

- A submitter must submit a issue for Oversight Review, as outlined in Section 18.2 or 18.4.4
- A submitter must raise issues within a reasonable period of time after the submitter becomes aware of an issue
- A response to an Oversight Review Issue may be that the resolution requested should be pursued under a different process in this CMP
- If the parties do not agree whether this process applies, the issue will be brought before the CMP Oversight Committee to determine whether the resolution sought by the submitter is available through this process or another documented process in this CMP

18.2 Issue Submission

An issue may be presented to the CMP body at a monthly CMP Meeting as part of the standing agenda item relating to the operation and effectiveness of CMP (*See* Section 2.1) or may be formally submitted by an e-mail to cmpesc@qwest.com and the CMP POC of the carrier that is the subject of the issue. If the issue is presented at a Monthly CMP Meeting and is not resolved, the submitter must follow the e-mail submission process.

In the event a party chooses to submit an e-mail as described above, the subject line of the issue submission e-mail must include:

- Company name
- "CMP OVERSIGHT REVIEW ISSUE SUBMISSION"

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The submission e-mail must include appropriate supporting documentation, if applicable, and, to the extent that the supporting documentation does not include the following information, the following must be provided:

- Description of issue
- Basis for considering the matter an Oversight Review Issue
- Citation from the Qwest Wholesale Change Management Document that addresses specific guidelines, if applicable
- Desired resolution
- Contact information including Name, Title, Phone Number, and e-mail address

Qwest must acknowledge receipt of the complete issue submission with an acknowledgement within one (1) business day. If the issue submission does not contain the above-specified information, Qwest must notify the submitter within one (1) business day, identifying and requesting information that was not originally included. When the issue submission is complete, the acknowledgement email will include:

- Date and time of issue submission receipt
- Date and time of acknowledgement email

Qwest must issue a notification announcing that an Oversight Review Issue has been submitted within two (2) business days after receipt of the complete issue e-mail submission. The subject of the notification will include "CMP OVERSIGHT REVIEW ISSUE SUBMISSION."

18.3 Issue Resolution

18.3.1 Response

The carrier cited in the original submission must respond by e-mail to cmpesc@qwest.com. Subject line of the Oversight Review issue response e-mail must include:

- Company name
- "CMP Oversight Review ISSUE RESPONSE"

The response e-mail must include appropriate supporting documentation, if applicable, and, to the extent that the supporting documentation does not include the following information, the following must be provided:

- Agreement/disagreement with the issue
- Reason for agreement/disagreement
- Citation from the Qwest Wholesale Change Management Process Document that addresses responding company position, if applicable
- Response to desired resolution, and alternative proposed resolution, if applicable

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- Respondent contact information including Name, Title, Phone Number, and e-mail address

Qwest must distribute a notification with the contents of the response e-mail within two (2) business days of receipt. The subject of the notification must include "RESPONSE TO CMP OVERSIGHT REVIEW ISSUE."

18.3.2 Issue Meeting

If the submitter of the Oversight Review Issue is not satisfied with the response provided under Section 18.3.1, the submitter may request a meeting of Qwest and interested CLECs to discuss the issue. Such meeting will be held no later than five (5) business days after the submitter's meeting request. One of the matters to be addressed at this meeting is whether additional meetings should be held to address the issue. Such meetings will be open to all CLECs and Qwest shall provide advanced notification of such meetings pursuant to this CMP. Qwest will provide notification of the outcome of these discussions within two (2) business days after such discussions are concluded. The subject of the notification must include "OUTCOME OF CMP OVERSIGHT REVIEW ISSUE."

18.3.3 Election to Pursue Issue with CMP Oversight Committee

At any point in the process under Sections 18.2 or 18.3, a participant in the discussions of an Oversight Review issue may elect to pursue the issue with the CMP Oversight Committee by sending an email to cmpesc@qwest.com.

18.3.4 Escalation or Dispute Resolution

If any party is not satisfied with the outcome of this Section 18.3, it may follow the Escalation or Dispute Resolution Processes.

18.4 CMP Oversight Committee

18.4.1 Membership

The CMP Oversight Committee will be comprised of one representative from Qwest, one representative from each of up to six (6) CLECs, and one representative from each public utilities commission that wishes to participate. Members of the CMP Oversight Committee must have a comprehensive understanding of this CMP. Names of the members of the CMP Oversight Committee will be listed on the Qwest Wholesale CMP website at the following URL: http://www.qwest.com/wholesale/cmp/coc.html. The membership of the committee has been established through the end of 2003. For 2004 and each year thereafter, the CLEC membership will be established on an annual basis through self nomination. If more than six (6) CLECs are

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nominated for membership, the CLECs will rank the nominees. The six (6) highest ranked nominees will be the CLEC members of the committee for the following year.

18.4.2 Role of the CMP Oversight Committee

The CMP Oversight Committee will act as a subject matter expert regarding the provisions of this CMP. The CMP Oversight Committee will deliberate on CMP Oversight Review Issues and make recommendations to the CMP body on matters such as interpretation of this CMP and proposed changes to this CMP. A recommendation of the CMP Oversight Committee may result in a CR to change this CMP as contemplated by Section 2.1.

18.4.3 Meetings of the CMP Oversight Committee

Meetings of the CMP Oversight Committee will be called on an ad hoc basis, as needed to address CMP Oversight Review Issues as described in Section 18.4.4, and will be called in the same manner, and applying the same time periods, as set forth in Section 3.0, Change Management Process Meetings. A CMP Oversight Committee meeting may be held at the end of a scheduled monthly CMP Meeting. In addition to the CMP Oversight Committee members, other persons may participate in the CMP Oversight Committee meetings to assist the committee in understanding the issues; however, final recommendations to the CMP body may only be made by the CMP Oversight Committee members. In order to conduct a meeting of the CMP Oversight Committee, a majority of its members must be present in person or by teleconference.

18.4.4 Submission of Oversight Review issues to the CMP Oversight Committee

Oversight Review issues may be submitted to the CMP Oversight Committee in a number of ways:

- When parties disagree on the application of the Oversight Review Issue Submission Process to an issue that is raised (*See* Section 18.1)
- A party submitting a CMP Oversight Review Issue under Section 18.2, may direct that the issue be brought to the CMP Oversight Committee;
- During the process under Section 18.3, or once that process is completed, a CMP participant may raise the Oversight Review Issue to the CMP Oversight Committee;
- A CMP Oversight Review Issue may be referred to the CMP Oversight Committee during a Monthly CMP Meeting

18.4.5 *CMP Oversight Review*

Qwest must issue a notification announcing that a CMP Oversight Review Issue has been referred to the CMP Oversight Committee within two (2) business days after such referral is made. This notification will provide the information for the meeting of the CMP Oversight Committee. The

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subject of the notification will include "POTENTIAL CMP OVERSIGHT REVIEW ISSUE REFERRED TO THE CMP OVERSIGHT COMMITTEE." The notification will solicit from committee members and submitting carrier, dates during the next ten (10) calendar days on which they are available to meet to address the issue. Qwest will establish a meeting date will be established based on the members' and submitting carrier's availability.

18.4.6 Status and Recommendations of the CMP Oversight Committee

Status of outstanding Oversight Review issues will be provided at the monthly CMP meetings and will be posted on Qwest's Wholesale CMP website at the following URL: www.qwest.com/wholesale/coc.html. Recommendations of the CMP Oversight Committee will be distributed to the CMP by e-mail notification with a heading that includes "RECOMMENDATION OF THE CMP OVERSIGHT COMMITTEE." Such notifications will state the issue and briefly describe the recommendation and include a link to more detailed information about the issue. Recommendations of the CMP Oversight Committee will be included on the agenda for the next monthly CMP meeting for discussion by the CMP body. If there is not agreement on a single recommendation by the CMP Oversight Committee, the notification will include the competing recommendations discussed by the CMP Oversight Committee.

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APPENDIX A: SAMPLE - IMA 11.0 RANK ELIGIBLE CRS

#	CR Number	Interface	Submit Date	Company	Status	Title	Shirt Size	Est LOE Min	Est LOE Max	CR Presenter	Ranking Note
Category A: Not Rank Eligible											
1	14886	IMA Common	9/28/01	Qwest	Pending Withdrawal	Pre-order Transaction: Due Date availability & standard Intervals	Extra Large	5501	8000	Winston, Connie	Category A: Not Rank Eligible
2	23943	IMA Common	9/28/01	Qwest	Pending Withdrawal	Shared Distribution Loop- Long Term	Large	3001	5500	Winston, Connie	Category A: Not Rank Eligible
3	25505	IMA Common	9/28/01	Qwest	Pending Withdrawal	Line Splitting for UNE-P accounts	Large	3001	5500	Winston, Connie	Category A: Not Rank Eligible
4	25591	IMA Common	9/26/01	Qwest	Pending Withdrawal	Flowthrough validate LPIC LSR Entries	Medium	751	3000	Winston, Connie	Category A: Not Rank Eligible
5	25800	IMA Common	9/28/01	Qwest	Pending Withdrawal	Add New Auto Push Statuses	Medium	751	3000	Winston, Connie	Category A: Not Rank Eligible
6	27751	IMA Common	9/28/01	Qwest	Pending Withdrawal	Intrabuilding Cable.	Large	3001	5500	Winston, Connie	Category A: Not Rank Eligible
7	27756	IMA Common	9/26/01	Qwest	Pending Withdrawal	Cancellation Remarks	Small	201	750	Winston, Connie	Category A: Not Rank Eligible
Category B: Above the Line											
1	SCR013002-6	IMA Common	1/30/02	Qwest	Clarification	PID Impact - PO-2B: Unbundled Loop and Local Number Portability Edits	Large	3001	5500	Martain, Jill	Category B: Above the Line
2	SCR013002-7	IMA Common	1/30/02	Qwest	Clarification	PID Impact - PO-2B: Resale POTS Edits	Large	3001	5500	Martain, Jill	Category B: Above the Line
1	24652	IMA Common	9/28/01	Qwest	Presented	Unbundled DID/PBX Trunk Port Facility move from LS to PS	Medium	751	3000	Winston, Connie	Category C: Rank Eligible
2	25091	IMA Common	9/26/01	Qwest	Presented	DSL Flowthrough - Re-Branding	Large	3001	5500	Winston, Connie	Category C: Rank Eligible
3	26636	IMA Common	9/28/01	Qwest	Presented	Shared Loop Enhancements	Medium	751	3000	Winston, Connie	Category C: Rank Eligible
4	30212	IMA Common	9/28/01	Qwest	Presented	Add New UNE-P PAL to IMA	Large	3001	5500	Winston, Connie	Category C: Rank Eligible
5	30215	IMA Common	10/23/01	Qwest	Presented	Wholesale Local Exchange Freeze	Large	3001	5500	Winston, Connie	Category C: Rank Eligible

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6	31766	IMA Common	9/28/01	Qwest	Presented	Reject Duplicate LSRs	Medium	751	3000	Martain, Jill	Category C: Rank Eligible
7	5043011	IMA GUI	8/31/00	Eschelon	Presented	Add an online glossary of the field title abbreviations to help menu of IMA GUI	Medium	751	3000	Eschelon	Category C: Rank Eligible

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APPENDIX B: SAMPLE - IMA 11.0 INITIAL PRIORITIZATION FORM

Assigned Point Value (see instructions)	#	CR Number	Title	Company	Interface	Products Impacted	Shirt Size	Est LOE Min	Est LOE Max
	1	24652	Unbundled DID/PBX Trunk Port Facility move from LS to PS	Qwest	IMA Common	Unbundled PID/PBX Trunk Port	Medium	751	3000
	2	25091	DSL Flowthrough - Re-Branding	Qwest	IMA Common	DSL	Large	3001	5500
	3	26636	Shared Loop Enhancements	Qwest	IMA Common	Shared Loop	Medium	751	3000
	4	30212	Add New UNE-P PAL to IMA	Qwest	IMA Common	UNE-P PAL	Large	3001	5500
	5	30215	Wholesale Local Exchange Freeze Based on CSRs	Qwest	IMA Common	All	Large	3001	5500
	6	31766	Reject Duplicate LSRs	Qwest	IMA Common	All Products	Medium	751	3000
	7	5043011	Add an online glossary of the field title abbreviations to help menu of IMA GUI	Eschelon	IMA GUI	All Products	Medium	751	3000
	8	5043076	Create a separate field for line numbers in EDI responses	Eschelon	IMA EDI		Large	3001	5500
	9	5206704	Add OCn capable loop LSR to IMA	ELI	IMA Common	DS1, DS3 & OCn Loop Orders	Large	3001	5500
	10	5405937	CLECs require availability to view completed LSR information in IMA GUI	Verizon	IMA GUI	Resale	Large	3001	5500
	11	5498578	Ability to send dual CFA information on an LSR for HDSL orders	WorldCom	IMA Common	HDSL	Small	201	750
	12	SCR010902-1	Limited IMA GUI Access for Pre-Order Transactions Only	McLeodUSA	IMA GUI	All	Medium	751	3000
	13	SCR012202-1	Incorrect Consolidation of DR5 USOC in IMA	Qwest	IMA Common	ISDN PRI	Medium	751	3000
	14	SCR013002-3	IMA Pre-Order - Use CCNA to retrieve a Design Layout Report (DLR)	Qwest	IMA Common		Medium	751	3000
	15	SCR013002-4	Revision of TOS field in IMA	Qwest	IMA GUI	UNE-P, Resale	Medium	751	3000

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	16	SCR013002-5	PIC Freeze Documentation	Qwest	IMA Common	Resale, UNE	Medium	751	3000

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APPENDIX C: SAMPLE - IMA 11.0 INITIAL PRIORITIZATION LIST

RANK	TOTAL POINT VALUE	CR Number	Title	Company	Interface	Products Impacted	Shirt Size	Est LOE Min	Est LOE Max	Original List #
1	251	SCR013102-15	LSOG 6 - Upgrade Field Numbering and Naming to Existing Qwest Forms & EDI Maps **(FOUNDATION CANDIDATE) (NOTE: Per February CMP Meeting Discussion, this CR should be ranked higher than all other LSOG 6 Change Requests)**	Qwest	IMA Common	All Products	Extra Large	5501	8000	32
2	231	SCR013002-8	Flowthrough on Sup 2 Category Due Date	Qwest	IMA Common	All Products except Designed Products	Large	3001	5500	17
3	227	SCR101901-1	Allow customers to move and change local service providers at the same time. **(NOTE: Per February CMP Meeting Discussion, this CR should be ranked higher than #26)**	Eschelon	IMA Common	Centrex Resale, UNE-P	Extra Large	5500	8000	35
4	214	31766	Reject Duplicate LSRs	Qwest	IMA Common	All Products	Medium	751	3000	6

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5	211	SCR013002-3	IMA Pre-Order - Use CCNA to retrieve a Design Layout Report (DLR)	Qwest	IMA Common		Medium	751	3000	14

Note: Throughout this document, OSS Interfaces are defined as existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users

Note: Throughout this document, the terms "include(s)" and "including" mean "including, but not limited to."

APPENDIX D: SAMPLE CHANGE REQUEST FORM – AS OF 03/03/05

CHANGE REQUEST FORM

CR # _____ **Status:** _____

Originated By: Date Submitted: _____

Company: _____ Internal Ref# _____

Originator: _____, _____, _____/_____

Name, Title, and email/phone#

Area of Change Request: Please click appropriate box(es) and fill out the section(s) below.

☐ Product/Process ☐ System

Exception Process Requested: Please click appropriate boxes

☐ Yes ☐ No

(Exception Process Requests will be considered at the next monthly CMP meeting unless Exception call/meeting requested)

☐ Exception call/meeting requested

☐ Qwest SME(s) requested at Pre-Meeting (list if required) _____, _____, _____

Available Dates/Time for Clarification/Exception Pre-Meeting
1.
2.
3.
4.
5.

Regulatory or Industry Guideline CR: Please click appropriate box if you would like the CR to be considered as a Regulatory or Industry Guideline change.

☐ Regulatory ☐ Industry Guideline; Indicate industry forum: _____

Title of Change:

Description of Change/Exception:

Expected Deliverables/Proposed Implementation Date (if applicable):

OPTIONAL – COMPLETE THE SECTIONS BELOW WHERE APPLICABLE

Products Impacted: Please Click all appropriate boxes & also list specific products within product group, if applicable.

☐ Ancillary	_____	☐ LNP	_____
☐ LIDB	_____	☐ Private Line	_____
☐ 8XX	_____	☐ Resale	_____
☐ 911	_____	☐ Switched Service	_____
☐ Calling Name	_____	☐ UDIT	_____
☐ SS7	_____	☐ Unbundled Loop	_____
☐ AIN	_____	☐ UNE	_____
☐ DA	_____	☐ Switching	_____
☐ Operation Services	_____	☐ Transport (Include EUDIT)	_____
☐ INP	_____	☐ Loop	_____
☐ Centrex	_____	☐ UNE-P	_____
☐ Collocation	_____	☐ EEL (UNE-C)	_____
☐ Physical	_____	☐ Other	_____
☐ Virtual	_____	☐ Wireless	_____
☐ Adjacent		☐ LIS / Interconnect	

- ☐ ICDF Collocation _____
- ☐ Other _____
- ☐ Enterprise Data Source _____
- ☐ Other _____
- ☐ Local Switching _____
- ☐ EICT _____
- ☐ Tandem Trans. / TST _____
- ☐ DTT / Dedicated Transport _____
- ☐ Tandem Switching _____

Area Impacted: Please click appropriate box.

- ☐ Pre-Ordering
- ☐ Provisioning
- ☐ Ordering
- ☐ Billing
- ☐ Maintenance / Repair
- ☐ Other _____

Form/Transaction/Process Impacted (IMA only): Please click all appropriate boxes.

Order

☐ LSR	☐ End User (EU)	☐ Resale (RS)	☐ Resale Split (RSS)
☐ Centrex (CRS)	☐ Resale Pvt. Line (RPL)	☐ Hunt Group (HGI)	☐ Loop Service (LS)
☐ Centrex Split (CRSS)	☐ Port Service (PS)	☐ Number Port (NP)	☐ Loop Service w/NP (LSNP)
☐ Frame Relay (RFR)	☐ DID Resale (DRS)		☐ Directory Listings (DL)
☐ Other _____			

LSR Activity

☐ N - New	☐ C - Change	☐ D - Disconnect	☐ T – Outside Move
☐ M – Inside Move	☐ Y - Deny	☐ L – Seasonal Suspend	☐ W – Conversion As Is
☐ B – Restore	☐ R - Record	☐ Z – Conv as Spec/No DL	☐ V – Conversion As Spec
☐ Other _____			

Pre-Order

☐ Address Validation	☐ CSR	☐ TN Reservation	☐ Loop Qual
☐ Facility Avail.	☐ Service Avail.	☐ CFA Validation	☐ Appointment Scheduler
☐ Raw Loop Data	☐ DLR	☐ Meet Point	☐ Listing Reconciliation
☐ Cancel	☐ Other _____		

Post-Order

☐ Local Response	☐ Completion	☐ PSON	☐ Billing Completion
☐ Status Updates.	☐ Status Inquiry	☐ LSR Notice Inquiry	☐ LSR Status Inquiry
☐ DSRED	☐ Batch Hot Cut	☐ Provider Notification	☐ Other _____

OSS Interfaces Impacted: Please click all appropriate boxes.

☐ CEMR	☐ IMA EDI	☐ MEDIACC	☐ QORA
☐ EXACT	☐ IMA GUI	☐ Product Database	☐ Wholesale Billing Interface
☐ Directory Listing	☐ HEET	☐ SATE	☐ Other _____

Change Request Form Instructions

The Change Request (CR) Form is the written documentation for submitting a CR for a Product, Process or OSS interface (Systems) change. The CR should be reviewed and submitted by the individual, which was selected to act as a single point of contact for the management of CRs to Qwest. Electronic version of the CR Form can be downloaded from the Qwest Wholesale WEB Page at http://www.qwest.com/wholesale/cmp/changerequest.html.

Product/Process and System CRs may be submitted to Qwest via e-mail at: cmpcr@qwest.com

To input data to the form, use the Tab Key to navigate between each field. The following fields on the CR Form must be completed as a minimum, unless noted otherwise:

Submitted By

- Enter the date the CR is being submitted to the Qwest CMP Manager.
- Enter Company's name and Submitter's name, title, and email/Phone #.
- Optional – identify potential available dates Submitter is available for a Clarification Meeting.
- Optional – enter a Company Internal Reference No. to be identified.

Area of Change Request

- Select the type of CR that is being submitted (Product, Process, or Systems).

Exception Process Requested

- Originator should indicate if they wish to have the request handled on an exception basis.
- Exception requests will be considered at the next monthly CMP meeting, unless the Originator requests an emergency call/meeting.
- Optional - Select Emergency call/meeting requested, if an emergency call/meeting is required.
- Optional - Originator may request a pre-meeting with Qwest by selecting the Pre-meeting with Qwest requested box.
- Optional - Originator may identify certain Qwest SME(s) to attend the Pre-meeting by selecting the Qwest SME(s) requested at Pre-Meeting box and listing the SME(s).

Regulatory or Industry Guideline CR

- Select either Regulatory or Industry Guideline if you would like the CR to be considered as a Regulatory or Industry Guideline change

Title of Change

- Enter a title for this CR. This should concisely describe the CR.

Description of Change/Exception

- Describe the Functional needs of the change being requested. To the extent practical, please provide examples to support the functional need and the names of Qwest personnel with whom the originator has been working to resolve the request. Also include the business benefit of this request.
- If Exception Process requested, provide reason for seeking an exception.

Expected Deliverables/Proposed Implementation Date (if applicable)

- Enter the desired outcome required (e.g. revised process, clarification, improved communication, etc.) and the desired date for completion. The specific deliverables Qwest must produce in order to close the CR. The originator should provide as much detail as possible.

Products Impacted – Optional

- To the extent known, check the applicable products that are impacted by the CR.

Area Impacted – Optional

- To the extent known, check the applicable process areas that are impacted by the CR.

OSS Interfaces Impacted – Optional

- To the extent known, check the applicable systems that are impacted by the CR.

Qwest's CMP Manager will complete the remainder of the Form.

APPENDIX E: SPECIAL CHANGE REQUEST PROCESS (SCRP) REQUEST FORM

SAMPLE

Qwest Wholesale Change Management Process (CMP)

Special Change Request Process (SCRP) Form

In the event that a systems CMP CR is not ranked high enough in prioritization for inclusion in the next Release, or as otherwise provided in the Qwest Wholesale CMP, the CR originator may elect to invoke the CMP Special Change Request Process (SCRP) as described Section 10.3 of the Qwest Wholesale Change Management Document.

The SCRP may be requested up to five (5) calendar days after prioritization results are posted. However, the SCRP does not supercede the process defined in Section 5.0 of the Qwest Wholesale Change Management Process Document.

The information requested on this form is essential for Qwest to evaluate your invocation of the Special Change Request Process (SCRP). Specific timeframes for evaluating your request are identified in the Special Change Request section of the Qwest Wholesale Change Management Process Document.

Complete the application form in full, using additional pages as necessary, and then submit the form to cmpesc@qwest.com. All applicable sections must be completed before Qwest can begin processing your request.

Requested By Name: _____ Email Address: _____

Company Name: _____

Address: _____

_____

Primary Technical Contact

Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

Primary Billing Contact

Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

Date of Request:_____

Qwest Wholesale Change Management Process Document – 09-13-05

Date Received: _____ *(Completed by Qwest CMP Manager)*

1. Provide Qwest Wholesale CMP CR number for which you are requesting the SCRP:

_____

2. Provide reason for invoking the SCRP.

_____

_____

3. Provide proposed release to include CR in or proposed implementation date.

_____

_____

4. Provide any additional information that you feel would assist Qwest in preparing the SCRP quote.

_____

_____

5. List contact information for any other companies joining in the SCRP.

Company Name: _____

Contact Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

Company Name: _____

Contact Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

6. List additional contacts, such as technical personnel, who may help us during the evaluation of this request.

Contact Name: _____ Email Address: _____

Telephone Number: _____ Fax Number: _____

Contact Name: _____ Email Address: _____

© 2005, Qwest Corporation

Telephone Number: _____ Fax Number: _____

Please submit this form to Qwest in the following manner:

Send an e-mail to the Qwest CMP SCRP mailbox (cmpesc@qwest.com). The subject line of the e-mail message must include:

- "SCRP FORM"
- CR number and title
- CR originator's company name

The text of the e-mail message must include:

- Description of the CR
- A completed SCRP Form
- A single point of contact for the SCRP request including:
  - Primary requestor's name and company
  - Phone number
  - E-mail address
- Circumstances which have necessitated the invocation of the SCRP
- Desired implementation date
- If more than one company is making the SCRP request, the names and point of contact information for the other requesting companies.

APPENDIX F: CLEC-QWEST VOTING TALLY FORM

Name of Call/Meeting:	
Date of Vote:	

Subject:	

Voting Carrier	Voting Participant (in person, by phone, or by email)	Vote		
		YES	NO	Abstain

Result:	

DEFINITION OF TERMS

Term	Definition
CLEC	A telecommunications provider that has authority to provide local exchange telecommunications service on or after February 8, 1996, unless such provider has been declared an Incumbent Local Exchange Carrier under the Federal Telecommunications Act of 1996.
Design, Development, Notification, Testing, Implementation and Disposition	Design: To plan out in a systematic way. Design at Qwest includes the Business Requirements Document and the Systems Requirements Document. These two documents are created to define the requirements of a Change Request (CR) in greater detail such that programmers can write system software to implement the CR. Development: The process of writing code to create changes to a computer system or sub system software that have been documented in the Business Requirements and Systems Requirements. Notification: The act or an instance of providing information. Various specific notifications are documented throughout this CMP. Notifications apply to both Systems and Product & Process changes Testing: The process of verifying that the capabilities of a new software Release were developed in accordance with the Technical Specifications and performs as expected. Testing would apply to both Qwest internal testing and joint Qwest/CLEC testing. Implementation: The execution of the steps and processes necessary in order to make a new Release of a computer system available in a particular environment. These environments are usually testing environments or production environments. Disposition: A final settlement as to the treatment of a particular Change Request.
Good Faith	"Good faith" means honesty in fact and the observance of reasonable commercial standards of fair dealing.
History Log	A History Log documents the changes to a specific document. The log will contain the document name and, for each change, the document version number, change effective date, description of

Term	Definition
	change, affected section name and number, reason for change, and any related CR or notification number.
Level of Effort	Estimated range of hours required to implement a Change Request
OSS Interface	Existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services provided by CLECs to their end users.
OSS Interface Application to Application Testing • Controlled Production Testing • Initial Implementation Testing • Migration Testing • Regression Testing	Controlled Production Testing: Controlled Production process is designed to validate CLEC ability to transmit transactions that meet industry standards and comply with Qwest business rules. Controlled Production consists of submitting requests to the Qwest production environment for provisioning as production orders with limited volumes. Qwest and CLEC use Controlled Production results to determine operational readiness for full production turn-up. Initial Implementation Testing: This type of application-to-application testing allows a CLEC to validate its technical development of an OSS Interface before turn-up in production of new transactions or significantly changed capabilities. Migration Testing: Process to test in the Customer Testing Environment a subsequent application-to-application Release from a previous Release. This type of testing allows a CLEC to move from one Release to a subsequent Release of a specific OSS Interface. Regression Testing: Process to test, in the Customer Test Environment, OSS Interfaces, business process or other related interactions. Regression Testing is primarily for use with 'no intent' toward meeting any Qwest entry or exit criteria within an implementation process. Regression Testing includes testing transactions previously tested, or certified.
Release • Major Release • Point Release • Patch Release	A Release is an implementation of changes resulting from a CR or production support issue for a particular OSS Interface There are three types of Releases for IMA.: • Major Release may be CLEC impacting (to systems code and CLEC operating procedures) via EDI changes, GUI changes,

Term	Definition
	technical changes, or all. Major Releases are the primary vehicle for implementing systems Change Requests of all types (Regulatory, Industry Guideline, CLEC originated and Qwest originated). • Point Release may not be CLEC code impacting, but may affect CLEC operating procedures. The Point Release is used to fix bugs introduced in previous Releases, apply technical changes, make changes to the GUI, and/or deliver enhancements to IMA disclosed in a Major Release that could not be delivered in the timeframe of the Major Release. • Patch Release is a specially scheduled system change for the purpose of installing the software required to resolve an issue associated with a trouble ticket.
Release Notification	A notification distributed by Qwest through the Mailout tool to provide the information required by the following sections of this CMP: 7.0 - Introduction of a New OSS Interface, 8.0 - Change to Existing OSS Interfaces and 9.0 - Retirement of Existing OSS Interfaces.
Release Production Date	The Release Production Date is the date that a software Release is first available to the CLECs for issuance of production transactions.
Software Defects	A problem with system software that is not working according to the Technical Specifications and is causing detrimental impacts to the users.
Stand-alone Testing Environment (SATE)	A Stand-Alone Testing Environment is a test environment that can be used by CLECs for Initial Implementation Testing, Migration Testing and Regression Testing. SATE takes CLEC pre-order and order transaction requests, passes the requests to the stand-alone database, and returns responses to the CLEC user. SATE uses pre-defined test account data and requests that are subject to the same BPL IMA/EDI edits as those used in production. The SATE is intended to mirror the production environment (including simulation of all legacy systems). SATE is part of the Customer Test Environment.
Sub-systems	A collection of tightly coupled software modules that is responsible for performing one or more specific functions in an OSS Interface.
Subject Matter Expert (SME)	An individual responsible for products, processes or systems identified or potentially affected by the CLEC or Qwest request.

Term	Definition
	When attending a CMP meeting, a SME will either answer specific questions about the request or take action items to answer promptly specific questions.
Technical Specifications	Detailed documentation that contains all of the information that a CLEC will need in order to build a particular Release of an application-to-application OSS Interface. Technical Specifications include: • A chapter for each transaction or product which includes a business (OBF forms to use) description, a business model (electronic transactions needed to complete a business function), trading partner access information, mapping examples, data dictionary Technical Specification Appendices for IMA include: • Developer Worksheets • IMA Additional Edits (edits from backend OSS Interfaces) • Developer Worksheets Change Summary (field by field, Release by Release changes) • EDI Mapping and Code Conversion Changes (Release by Release changes) • Facility Based Directory Listings • Generic Order Flow Business Model The above list may vary for non-IMA application to application interfaces
Version	A version is the same as an OSS Interface Release (Major or Point Release)

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF ESCHELON TELECOM OF ARIZONA, INC.	)	
Complainant,	)	**DOCKET NO. T-03406A-06-0257**
vs	)	**T-01051B-06-0257**
QWEST CORPORATION	)	
Respondent.	)	**AFFIDAVIT OF RENEE ALBERSHEIM**
STATE OF COLORADO	) :	**SS**
COUNTY OF DENVER	)	

Renee Albersheim, of lawful age being first duly sworn, deposes and states:

1. My name is Renee Albersheim. I am a Staff Witnessing Representative for Qwest Services Corporation in Denver, Colorado. I have caused to be filed written direct testimony in Docket Nos. T-03406A-06-0257 and T-01051B-06-0257.

2. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.

Renée Albersheim

Renée Albersheim

SUBSCRIBED AND SWORN to before me this 24th day of August, 2006.

Jean M Towner

Notary Public

My Commission Expires: 4-13-2010

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM MUNDELL
Commissioner
MIKE GLEASON
Commissioner
KRISTIN MAYES
Commissioner
BARRY WONG
Commissioner

IN THE MATTER OF THE COMPLAINT OF ESCHELON TELECOM OF ARIZONA, INC. AGAINST QWEST CORPORATION	)	DOCKET NO. T-03406A-06-0257 DOCKET NO. T-01051B-06-0257

DIRECT TESTIMONY

OF

JEAN L. NOVAK

ON BEHALF OF

QWEST CORPORATION

AUGUST 28, 2006

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I. IDENTIFICATION OF WITNESS

Q. PLEASE DESCRIBE FOR THE COMMISSION YOUR CURRENT EMPLOYMENT.

A. I am currently employed by Qwest Services Corporation ("Qwest") as a Regional Service Director. I have been employed by Qwest for 21 years, and have been working in the telecommunications industry for 23 years. I hold a Certificate of Computer Programming from Globe Business College.

I have been working in Qwest's Wholesale Markets organization since May of 2004. I previously worked in Qwest's Wholesale Markets from 1988 to 1991 providing sales and support to a major Interexchange Carrier, and from 1997 to 2000 supporting a large Competitive Local Exchange Carrier (CLEC). As a Regional Service Director, I provide service management functions in support of CLECs. My responsibilities include clarifying Qwest's processes, providing service analysis, acting as CLEC advocate, interfacing with Qwest internal departments and providing escalation and expedite assistance, as needed. In performing these responsibilities, I have gained extensive familiarity with Eschelon Telecom of Arizona, Inc. ("Eschelon"), specifically with Eschelon's practices as to accounts payable to Qwest.

II. PURPOSE OF TESTIMONY

Q. PLEASE DESCRIBE THE PURPOSE OF YOUR TESTIMONY.

A. The purpose of my testimony is to discuss three different issues. First, I will describe difficulties Qwest has experienced with Eschelon regarding payment of amounts owing to Qwest, including Eschelon's refusal to pay charges unless they appear in Eschelon's interconnection agreement ("ICA"). Second, I will discuss the fact that Eschelon requested several orders for unbundled loops to

be expedited between January 2006 and March 2006, and that Qwest uniformly refused to provide those expedites because Eschelon was not compliant with the processes for obtaining expedites approved in the Change Management Process (CMP). Third, I will discuss the specific facts concerning Eschelon's request that Qwest disconnect a DS1 Capable Loop at the Marc Center, the facts and circumstances surrounding this disconnect, and Eschelon's subsequent request for Qwest to provision a new order for it on an expedited basis.

III. SUMMARY OF TESTIMONY

Q. WILL YOU PLEASE SUMMARIZE YOUR TESTIMONY?

A. My testimony describes three different issues.

First, Eschelon has failed to pay millions of dollars owed to Qwest. Eschelon routinely refuses to pay an invoice, even if Qwest performed the work at Eschelon's request, when a specific rate for the work is not set forth in an ICA.

Second, Eschelon was well aware of the fact that the process for expediting orders for unbundled loops was modified in the Commission-approved Change Management Process. Indeed, Qwest had rejected several requests from Eschelon between January and March 2003 to expedite orders for unbundled loops. On each occasion, Qwest informed Eschelon that it would not fulfill the expedite request because Eschelon's ICA did not contain a rate to expedite orders.

Third, Eschelon specifically requested that Qwest disconnect a DS1 Capable Loop that served the Marc Center in Mesa, Arizona. In this circumstance, Qwest disconnected the loop per Eschelon's request. Then Eschelon improperly attempted to cure its mistake by issuing a trouble report, rather than submitting a new order. Eschelon compounded the problem by issuing a new order that did not indicate on the Local Service Request ("LSR") that it wanted the order

expedited. Eschelon's failure to do so slowed the entire expedite review process. Then, almost a full day later, Eschelon orally requested that the order be expedited. Of course, Qwest rejected the request for the same reasons that it had rejected many other orders in the past. Then Eschelon finally submitted a request for a tariffed private line, and Qwest provisioned the circuit on the exact same day that it was requested by Eschelon in its oral escalation. Everything surrounding the circumstances at the Marc Center show that Qwest acted professionally and responsibly.

IV. IT HAS PROVEN DIFFICULT FOR QWEST TO COLLECT ACCOUNTS PAYABLE FROM ESCHELON

Q. DESCRIBE YOUR JOB RESPONSIBILITIES INSOFAR AS THEY REQUIRE INTERACTION WITH ESCHELON.

A. I am the principal point of contact for Eschelon at Qwest. As a result, I routinely interact with Eschelon. As a general rule, Eschelon demands a great deal of my time. Eschelon's representatives routinely escalate issues and demand prompt responses. In my years of experience interfacing with CLECs, managing the Eschelon account is much more time intensive than any other CLEC in Qwest's 14-state region.

Q. HAS QWEST HAD DIFFICULTIES COLLECTING ON ACCOUNTS PAYABLE FROM ESCHELON IN THE PAST?

A. Yes, Qwest has had extreme difficulty in collecting amounts payable from Eschelon. Specifically, at the present time, Eschelon has outstanding accounts payable to Qwest in the millions of dollars because Eschelon refuses to pay.

Q. CAN YOU PROVIDE EXAMPLES OF THESE DIFFICULTIES?

A. Eschelon has refused to pay, for example, Maintenance of Service Charges. Eschelon has claimed in Oregon that these charges are not commission-

approved and are not in its negotiated interconnection agreement and, therefore, instead of paying the stated charges, Eschelon has paid a rate effective in another state and has continued to dispute the charges. This is despite the fact that Qwest pointed Eschelon to the specific provisions of the Oregon rate sheet (Exhibit A) that support the charges. Here are more examples:

1. Design Service Charge – Eschelon states that the rates in the ICA are proposed and refuses to pay any rate.

2. 30 Day Minimum Billing – Escheon refuses to pay because the rates are notlisted in the ICA.

3. Prior to May 25, 2006, Eschelon's undisputed balances were over $3.0 Million. On May 25, 2005, Qwest sent a letter to Eschelon stating that Eschelon was in default of its interconnection agreements (ICAs) as well as failing to pay under various Qwest tariffs with a resulting undisputed balance of $3,128,651.73. ***See Exhibit JN-1.*** On June 21, 2006, Eschelon stated in a letter to Qwest that Eschelon had made payments on the undisputed past due balances. ***See Exhibit JN-2.*** However, upon review, Qwest found that almost $1.0 million had been paid by Eschelon to an account for Oregon Telecom, a company Eschelon recently acquired. Qwest, again, notified Eschelon on July 5, 2006, of undisputed past due balances. ***See Exhibit JN-3.***

Based on the past history of Eschelon's failure to pay for services rendered, as well as its current conduct, Qwest has made a business decision to require Eschelon to enter into an amendment to its ICAs to order any service that is not listed in the ICAs with a corresponding rate.

V. ESCHELON'S KNOWLEDGE OF THE EXPEDITE PROCESS CREATED IN CMP

Q. DESCRIBE YOUR INTERACTIONS WITH ESCHELON CONCERNING EXPEDITES FROM AN HISTORICAL PERSPECTIVE.

A. Eschelon operates as a CLEC in six different states, one of which is Arizona. Historically, Eschelon has requested expedited due dates in each of these states. For all six states combined, Eschelon sought: (a) 201 expedite requests in 2003; (b) 764 expedite requests in 2004; and (c) 370 such requests in 2005. Each such request sought a shorter than standard interval. Historically, the reasons provided by Eschelon for expediting due dates on unbundled loops were (a) customer out of service, (b) customer moved without notice, (c) grand opening, (d) Eschelon caused an outage for the customer or (e) Qwest caused an outage for the customer. Irrespective of the time frame, including today, Qwest routinely expedites orders where Qwest causes an outage for the Eschelon customer; and Qwest provide such expedites at no charge. Over the course of time between 2003 and 2006, the processes for expediting orders changed several times via the CMP.

Eschelon is alleging that Qwest approved every expedite request regardless of the reason prior to January 1, 2006. This is inaccurate. Eschelon's own Exhibit D, attached to the testimony of Bonnie Johnson, demonstrates that Qwest rejected some requests, and uniformly followed the process in existence at the time for expediting orders for unbundled loops. As the process changed for expedites via CMP, so did the response from Qwest. Eschelon's Exhibit D contains only one circumstance where Qwest approved an expedite after January 1, 2006. That situation arose as the result of a Qwest typographical error. Because the problem was caused by Qwest's conduct, Qwest provided

1 the expedite to Eschelon at no charge. ***See Confidential Exhibit JN-4***
2 (Escalation Ticket 25882224 dated February 2006).[1]

3 In March 2003, I personally attended an executive meeting with several Eschelon
4 employees and informed them of the substantial drain they were causing on
5 Qwest's resources because of the number of expedites/escalations that
6 Eschelon was requesting. For the month of February 2003 alone, Eschelon
7 submitted 1928 escalation tickets to Qwest – an average of 69 tickets per day.
8 ***See Confidential Exhibit JN-5.*** Of these tickets, approximately 10% concerned
9 requests by Eschelon for Qwest to shorten the provisioning cycle (requests for
10 expedites being one such example). This equates to about 10 requests each
11 business day to shorten the provisioning cycle. Over the last several years,
12 Qwest has worked with Eschelon, both independently and cooperatively via
13 CMP, to improve processes as well as the business interactions between the two
14 companies. The proof of these efforts can be seen in the fact that Eschelon
15 opened 572 escalation tickets in July 2006 – a 70% improvement over February
16 2003. ***See Confidential Exhibit JN-6.***

17 **Q. WERE YOU AWARE OF THE FACT THAT THE PROCESS FOR EXPEDITING**
18 **AN ORDER FOR AN UNBUNDLED LOOP CHANGED IN 2005 AND BECAME**
19 **EFFECTIVE IN JANUARY 2006?**

20 A. Yes. It was well known that in the Change Management Process (CMP), a new
21 process was developed for expediting orders for unbundled loops. This new
22 process required that the CLEC have an interconnection agreement that

[1] Attachment D is also misleading because Eschelon is combining requests for nondesign (POTS) orders with requests for design services (unbundled loops). For a more detailed discussion of the differences between these types of orders, see the testimony of Renee Albershein and Jill Martain. Attachment D is also misleading because it contains circumstances where orders are delayed because Qwest does not have facilities to fill the order. This is a completely different scenario, and did not belong in a discussion of expedites.

contained a rate for Qwest's expedite of unbundled loops. Eschelon's ICAs did not contain such a provision.

Q. WAS ESCHELON AWARE OF THE NEW CMP APPROVED PROCESS FOR EXPEDITING ORDERS FOR UNBUNDLED LOOPS?

A. Yes, absolutely. I had many discussions with Eschelon about the subject. Each time Eschelon requested involvement from my organization – Service Management – to obtain an expedited due date for an unbundled loop, we explained the new expedite process. I have attached emails confirming some of those discussions. ***See Confidential Exhibit JN-7.***

It is Eschelon's process to keep a matrix of issues that it brings to Qwest, which require Qwest's research prior to responding. Eschelon has never included an issue concerning expedites on unbundled loops because Eschelon knows the process for expediting orders for unbundled loops (designed services). If the issue is not resolved to Eschelon's satisfaction, Eschelon moves the item to the "Unresolved" tab of the matrix. ***See Confidential Exhibit JN-8.*** Qwest's process for expediting orders for unbundled loops has never been included in this matrix.

Indeed, it was well known that the new CMP process for expediting orders for unbundled loops would take effect in January 2006. Shortly thereafter, on January 3, 2006, Eschelon submitted a request to expedite an order for an unbundled loop. Qwest refused to provide the expedite because as required by CMP, the Eschelon ICA did not contain a rate for expediting an order. Between January 3, 2006 and March 7, 2006, Eschelon submitted more than 10 requests for similar expedites. Qwest refused each such request. During this timeframe, I continued to have discussions with Eschelon about the expedite process. There were two key Eschelon employees that worked with Service Management concerning expediting due dates for unbundled loops, Ben Schulz and Ronda

Knudson. Each time, Eschelon was directed to the PCAT, and informed of the process requirements for expediting orders for unbundled loops. Eschelon continued to open escalation tickets requesting expedited due dates without an expedite amendment. On January 3, 2006, Eschelon opened Escalation Ticket 25868574, which stated Qwest made an error in provisioning an order. ***See Confidential Exhibit JN-9***. After review, Qwest determined it did not cause the error, and denied the requests and closed the ticket. Id. On January 4, 2006, Eschelon then contacted Service Management, and challenged the closure of Escalation Ticket 25868574. Service Management reviewed the circumstances, confirmed that the ticket was properly closed, and denied the request.

On February 6, 2006, Eschelon opened Escalation Ticket 25884338 requesting an expedited due date for unbundled loops, and stated that the request concerned a medical facility out of service. ***See Confidential Exhibit JN-10***. In reality, the orders were for new installs. Qwest denied the request because Eschelon did not have an expedite agreement. Then on the same day, Eschelon opened a second Escalation Ticket 25884367, claiming there were cable problems at the same customer's location and requested an expedited due date for the unbundled loops to obtain working service for the customer. ***See Confidential Exhibit JN-10***. Qwest told Eschelon to submit a trouble report to the repair center because it concerned existing service. Qwest again denied the expedite request.

On February 16, 2006, Eschelon opened Escalation Ticket 25889896 requesting an expedited due date for unbundled loops that Eschelon disconnected in error. ***See Confidential Exhibit JN-11***. In this circumstance, Eschelon stated that it was willing to pay the expedite charge. Qwest denied the request because Eschelon did not have an expedite amendment.

On February 17, 2006, Eschelon submitted Escalation Ticket 25890448 requesting an expedited due date for an unbundled loop. ***See Confidential Exhibit JN-12***. Qwest again advised Eschelon that the request would be denied because Eschelon did not have an expedite amendment.

It is abundantly clear that Eschelon was well aware of the process for expediting orders for unbundled loops prior to Eschelon opening the 3 escalation tickets for the Marc Center. ***See Confidential Exhibit JN-13***.

VI. ESCHELON WAS THE CAUSE OF THE PROBLEMS EXPERIENCED AT THE MARC CENTER.

Q. DESCRIBE THE CIRCUMSTANCES THAT LED TO THE DISCONNECT OF THE DS1 CAPABLE LOOP AT THE MARC CENTER.

A. On March 8, 2006, Qwest received a LSR from Eschelon to disconnect a DS1 Capable loop for one of its customers. The disconnect was requested for March 15, 2006. ***See Confidential Exhibit JN-14.*** Over the course of the next few days, Qwest sent notices to Eschelon informing Eschelon of its plan to disconnect the loop as requested by Eschelon. Specifically, Qwest sent Eschelon a Firm Order Confirmation (FOC) informing Eschelon the disconnect would occur on March 15, 2006 as requested. ***See Confidential Exhibit JN-15.*** Qwest also sent Eschelon a PSON stating the exact same thing. ***See Confidential Exhibit JN-16.*** Despite receiving multiple notices, Eschelon never asked Qwest to stop the disconnect; as a result, the disconnect took place as scheduled on March 15, 2006.

I later learned that the DS1 Capable Loop served a customer in Mesa, Arizona known as the Marc Center. I have come to learn that the Marc Center is a non-profit organization that serves people with disabilities.

Q. DID ESCHELON REQUEST THAT QWEST REPAIR THE DISCONNECTED FACILITY?

A. Yes, on March 15, 2006, Qwest initially sent a completion notice to Eschelon informing it of the disconnect at 10:02 a.m. ***See Confidential Exhibit JN-17.*** At 10:23 a.m., Eschelon opened a mechanized trouble report asking Qwest to repair the service. As Ms. Bonnie Johnson from Eschelon admits, a disconnect order cannot be rectified with a trouble report. ***See Johnson Testimony at p. 29:15-18.*** A new order must be submitted. Once this trouble report was issued, the service was restored for a brief period of time. However, Eschelon never asked Qwest to stop the disconnect process it had initiated.[2] As a result, the disconnect process continued and the DS1 Capable Loop was disconnected on March 15, 2006.[3]

Eschelon suggests that its trouble report should have resolved the situation; however, Eschelon knew otherwise. ***See Johnson Testimony at p. 29:15-18.*** Moreover, on March 16, 2006 at 2:37 p.m., notes created by Marc Center personnel state that Jared Arnold of Eschelon contacted them and informed them that "they will place an order to turn it back on but it will take 5 business days to do it." ***See Confidential Exhibit JN-18.*** This was just 1 hour and 22 minutes after Eschelon contacted the Marc Center and told them that Qwest disconnected the circuit on March 15, 2006.

Q. DID ESCHELON SUBMIT AN ORDER FOR A NEW DS1 CAPABLE UNBUNDLED LOOP?

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[2] A request to stop a disconnect can occur before the disconnect occurs, meaning before Qwest sends the completion notice.

[3] The technician that restored the service for a brief period of time performed this work outside of Qwest's standard process. The technician is supposed to determine whether the outage has occurred due to a disconnect order. The technician failed to follow this step of the process. The technician has since been reminded of the process, and that he had acted outside of process.

A. Yes. On Thursday, March 16, 2006, Eschelon submitted an order for a new DS1 Capable Loop. The order did not check the box on the LSR concerning an expedite with a "Y", which would have let Qwest know that Eschelon wanted to expedite the order. ***See Confidential Exhibit JN-19.*** Instead, at 12:38 p.m. on March, 17, 2006 – almost one full day after the new order was submitted – Rhonda Knudson from Eschelon contacted the Qwest Call Center and asked that the order be expedited. Ms. Knudson asked that the order be expedited "for today or first thing Monday, 3/20/2006." ***See Confidential Exhibit JN-20.*** Less than 2 hours later, Qwest rejected the request for an expedited due date. ***Id.*** Eschelon then escalated the ticket further to me personally claiming medical emergency. ***Id.*** I specifically informed Eschelon that the request did not qualify for expedited orders on unbundled loops because it did not satisfy the requirements of the expedite process set forth in the Commission approved CMP. ***Id.*** Thus, Qwest very promptly not once, but three times, informed Eschelon that it did not qualify to obtain an expedited due date for the Marc Center.

Q. DO YOU HAVE ADDITIONAL DETAILS ABOUT THE EXPEDITE PROCESS SPECIFICALLY AS IT RELATED TO THE MARC CENTER?

A. Yes. I became involved with the expedited due date request for the Marc Center on March 17, 2006 at approximately 1:30 p.m. CST. I was contacted by Ronda Knudson of Eschelon, who requested my assistance. Ms. Knudson requested that I look at the LSR and see if I could assist. At this time, Ms. Knudson did not have an LSR or order number for me to investigate. I waited until approximately 1:59 p.m. CST for Ms. Knudson to call me again to tell me the LSR or order number, and then I called another contact at Eschelon to get Ms. Knudson's contact information. At 2:11 p.m. CST, Ronda Knudson returned my call with the LSR. I asked Ms. Knudson if there was an open escalation ticket. After our conversation, Ms. Knudson opened an escalation ticket. At no time during this

conversation did Ms. Knudson mention to me that a trouble report had been opened on the disconnected circuit, nor did she request my assistance with Eschelon's belief that the repair ticket should have resolved the out of service condition for the Marc Center. Eschelon is well aware that disconnected services can only be reinstated with a new order, and that was the reason Eschelon had issued a LSR for a DS1 Capable Loop for the Marc Center. I had discussions with the Minneapolis Center Team Lead regarding any possibility of expediting the order for the unbundled loop. After reviewing the LSR, Qwest determined that Eschelon had not requested reuse of facilities nor had they provided the disconnect order number. The Minneapolis Center Team Lead and myself contacted Ms. Knudson requesting the information. Ms. Knudson was not available and we left a voice mail requesting the disconnect order. After we hung up, the Minneapolis Center Team lead reviewed all the facts surrounding the requested expedite including the letter Eschelon had faxed to Qwest describing the business activities of the Marc Center. Based on Eschelon not having an expedite amendment and based on the fact that there was no medical emergency, Qwest denied the expedite request for the third time.

I then contacted Ronda Knudson, stating the expedite was denied. Ms. Knudson left a voice message on my home answering machine stating:

> Hi Jean, its Ronda. Got your voice mail - understand. Wondering if you could help me get them some QPP line installed right away. What I'm hoping to do get them in today or tomorrow considering we can order with due date of tomorrow for QPP. Can you give me a call back. I did leave my cell phone home today. So unfortunately you'll have to leave a voice mail if you don't get me. But you can call me on 612-436-6299.

At approximately 6 p.m. CST, Ronda Knudson called me and asked if I would approve the expedite if Eschelon agreed to pay the expedite charges. I advised

her that Qwest would not be able to approve an expedite without an expedite amendment.

On March 18, 2006, Ronda Knudson called me at home requesting my assistance on the subject once again. Ms. Knudson informed me that Eschelon was submitting an ASR, ordering a special access service (DS1 private line) out of the Qwest retail tariff, and that it would be paying the expedite charges set forth in that tariff. After attempting to contact the order writing center, I learned that the Qwest Des Moines Center was closed on Saturday so the order could not be filled on Saturday, March 18, 2006. I advised Ms. Knudson, and requested the PON number for the ASR. I stated that I would get the order written as soon as possible on Monday, March 20, 2006. I contacted Ronda Knudson at 7:30 a.m. CST on March 20, advising that the order was ready but I needed Eschelon to submit a supplemental order to change the expedited due date from March 18 to March 20, 2006. Eschelon complied with the request and by end of day the new service was working at the customer's location.

Q. EVEN IF THE FORMER EXPEDITE PROCESS WAS IN PLACE, WOULD THE MARC CENTER QUALIFY FOR AN EXPEDITE?

A. No. After Eschelon complained, I performed some research and verified that the Marc Center had additional lines into the facility. Thus, the Marc Center had existing telephone service during the time frame in question, including 911 service. The DS1 Capable Loop was intended to provide additional service into the individual rooms at the Marc Center. I have been informed, based on an interview with personnel at the Marc Center, that the Marc Center was fully aware of the fact that they had 911 service through existing lines. As a result, I understand that a memo was distributed to Marc Center personnel about how to make a 911 call. Indeed, during the few days when the service was down, on one occasion 911 service was utilized, and the Marc Center used the existing

circuits to make the 911 call. The 911 call was completed, and things worked out well. Thus, no medical emergency existed.

Q. GIVEN THAT ESCHELON WAS THE CAUSE OF THE DISONNECT IN ERROR, DOES IT MAKE SENSE THAT ESCHELON PAY AN EXPEDITE CHARGE?

A. From a purely practical perspective, it seems incongruous for Eschelon to claim that it does not need to pay an expedite fee when a customer is disconnected due to an Eschelon error. In all circumstances, if Qwest causes a disconnect in error, it restores the service at no charge. In this circumstance, it is undisputed that the Marc Center lost its DS1 Capable Loop due to an Eschelon error. In that circumstance, Eschelon should be thanking Qwest for helping them get the service restored. This is clearly a circumstance when Eschelon should be ready, willing and able to pay an expedite fee.

Q. DOES THIS CONCLUDE YOUR TESTIMONY.

A. Yes, it does.

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM MUNDELL
Commissioner
MIKE GLEASON
Commissioner
KRISTIN MAYES
Commissioner
BARRY WONG
Commissioner

IN THE MATTER OF THE COMPLAINT OF ESCHELON TELECOM OF ARIZONA, INC. AGAINST QWEST CORPORATION	)	DOCKET NO. T-03406A-06-0257 DOCKET NO. T-01051B-06-0257

EXHIBITS

OF

JEAN L. NOVAK

ON BEHALF OF

QWEST CORPORATION

AUGUST 28, 2006

EXHIBIT JN-1

Qwest
Spirit of Service™

EXHIBIT JN-1

May 25, 2006

Via E-mail and Certified Mail, Return Receipt Requested

Christopher Gilbert
Eschelon Telecom
730 2nd Ave S
Minneapolis, MN 55402

Re: Past Due Balances

Dear Christopher:

This letter constitutes notice of default under the interconnection agreements between Qwest Corporation ("Qwest") and Eschelon Telecom, Inc. and its affiliates ("Eschelon") in Arizona, Colorado, Minnesota, Oregon, Utah, and Washington (individually and collectively, the "ICA"). This letter further constitutes notice of default under Qwest's federal tariff, Tariff F.C.C. No.1 (the "Tariff").

This notice is sent to you pursuant to the notice provisions of the ICA and the Tariff. For at least the past two years Eschelon has engaged in what can only be described as a deliberate strategy of dilatory payments to Qwest. On average, Eschelon takes over 73 days to pay its invoiced charges. This is 30 to 40 days longer than other CLECs in its peer group, i.e., those CLECs incurring similar monthly charges. Even then, Eschelon does not consistently pay undisputed past due amounts in full. As a result, Eschelon has accumulated a significant *undisputed* past due balance that rolls from month to month and never gets paid in a timely fashion.

As of May 24, 2006, Eschelon's undisputed past due balance under the ICA and the Tariff was $3,128,651.73.[1]

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[1] This figure reflects Eschelon's past due amount according to Qwest's records as of May 24, 2006 less the $932,368.84 in pending disputes as of April 25, 2006 according to e-mail correspondence from Dennis Ahlers of Eschelon. Qwest has been advised that Eschelon believes that a greater amount is in fact in dispute. If Eschelon believes the amount in disputes pending has changed since April 25, 2006 Qwest should be advised of that fact. Qwest believes that a significant percentage of the pending disputes have been determined to be correctly billed by Qwest. Qwest reserves its rights to address these charges separately and to challenge Eschelon's pending dispute figure.

In response to Eschelon's payment practices, Qwest has repeatedly demanded, in writing, that Eschelon comply with the ICA and Tariff payment deadlines. However, Eschelon has routinely ignored these demands and has chronically missed payment deadlines and paid substantial undisputed charges under the ICA and Tariff well past the due date, if at all. Qwest is forced to conclude that Eschelon has come to rely on Qwest, at least in part, to finance its operations. This situation is detrimental to Qwest and has become intolerable.[2]

Under the terms of the ICA, failure to pay timely amounts due thereunder constitutes a material breach.[3] Because of its undisputed past due balance, Eschelon is in breach of the ICA. As a result of Eschelon's breach, Qwest is entitled under the ICA to "pursue all available legal and equitable remedies." This includes, but is not limited to, suspending service order activity.

In addition, Eschelon owes undisputed past due amounts under the Tariff. Pursuant to section 2.1.8(A) of the Tariff, Qwest is entitled to pursue various remedies in the event of default including, but not limited to, suspension of service order activity.

Accordingly, in compliance with the ICA and Tariff provisions cited above, Qwest will exercise its right to suspend all Eschelon service order activity under the ICA and the Tariff effective June 26, 2006. All undisputed past due amounts under both the ICA and the Tariff, including applicable late payment charges, must be paid before June 26, 2006 to avoid suspension of service order activity under the ICA and the Tariff. To obtain the current amount owed and/or to arrange to pay the past due balance please contact: Kathie Maki (801-239-4483) or Valene Kipp (801-239-4215), 250 Bell Plaza, 6th floor, Salt Lake City Utah, 84111; 801-239-4483. No further notices will be sent.

Qwest reserves the right to pursue all other available remedies, legal and equitable, until all undisputed past due amounts under both the ICA and the Tariff, including applicable late payment charges, are paid.

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2 It should be noted that the undisputed past due amount stated herein is accurate as of May 24, 2006 according to Qwest's records. It is exceedingly difficult to calculate with precision Eschelon's past due balance at any given point in time in large part because of the payment practices described in this letter.

3 Arizona ICA section 32.1.1; Colorado ICA section 21.1.1; Minnesota ICA section 1.4.1; Oregon ICA section 1.4.1; Utah ICA section 32.1.1; Washington ICA section 32.1.1.

You may contact me directly with any questions about this notice.

Sincerely,

Valene Kipp

cc: J. Jeffrey Oxley
Karen Clauson
Arizona Corporation Commission
Colorado Public Utilities Commission
Minnesota Public Utilities Commission
Public Utility Commission of Oregon
Utah Division of Public Utilities
Washington Utilities and Transportation Commission

EXHIBIT JN-2

EXHIBIT JN-2

June 21, 2006

Via Fax (801.239.4149) and Overnight Delivery

Valene Kipp
Qwest
250 Bell Plaza, Suite 601
Salt Lake City, UT 84111

Re: Letter of May 25, 2006

Dear Ms. Kipp:

On June 20, 2006, Chris Gilbert advised you (via e-mail) of the payments that have been made by Eschelon in response to your May 25, 2006 letter. Eschelon believes that it has complied with the payment demand in that letter by making the following payments to Qwest:

$3,059,156.10 on 6/01/06 via Checks
$5,352,179.78 on 6/12/06 via Checks
$526,443.75 on 6/19/06 via Wire Transfer

Enclosed is our letter dated June 5, 2006 in which we said "Eschelon assumes that Qwest will take no action, absent further written notice, to suspend service order activity or otherwise disrupt the provision of services to Eschelon and its customers."

Qwest has not indicated that it disagrees with this statement, and we are relying on the fact that we have made payment and Qwest will not stop processing orders. If Qwest has any other view, intent, or plan, it needs to expressly notify Eschelon (using the notice provisions of the ICA) of its position and the basis for that position and identify any steps

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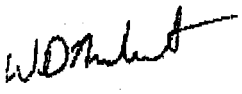
www.eschelon.com

that Qwest plans to take and when Qwest plans to take them. Absent that, Qwest has confirmed that Eschelon has met the payment demands and Qwest has withdrawn its threat to cease processing orders.

Sincerely,



William D. Markert
Executive Vice President – Network Financial Management
Eschelon Telecom, Inc.
612.436.6265 (direct)
612.436.6365 (fax)
wdmarkert@eschelon.com

Enclosure
cc by email to:

Richard Corbetta, Qwest
Harisha Bastiampillai, Qwest
Larry Christensen, Qwest
Christopher Gilbert, Eschelon
J. Jeffrey Oxley, Eschelon
Dennis Ahlers, Eschelon
Douglas K. Denney, Eschelon

cc by U.S. mail to:

Arizona Corporation Commission, Utilities Division
Colorado Public Utilities Commission
Minnesota Public Utilities Commission
Oregon Public Utility Commission
Utah Public Service Commission
Tom Wilson, Washington Utilities and Transportation Commission

June 5, 2006

Via E-mail and Certified Mail, Return Receipt Requested

Valene Kipp
Richard Corbetta
Qwest
250 Bell Plaza, Suite 601
Salt Lake City, UT 84111

Re: Letter of May 25, 2006

Dear Ms. Kipp and Mr. Corbetta:

I am writing to update you on Eschelon's position concerning the issue of Eschelon's payments to Qwest. In Qwest's May 25th letter, Qwest threatened Eschelon with "suspending service order activity." That means Qwest would disrupt our customer orders, and Qwest said it would do so ***this month***! The consequences of Qwest carrying out that threat would be so disruptive and potentially devastating that, to avoid that possibility, Eschelon has no choice but to bring our account current[1] even though Qwest did not provide the amount allegedly due by state and despite Eschelon's valid disputes. In our May 31st letter, we outlined our objections to Qwest's actions. This letter is to inform you that despite Qwest's failure to provide the requested explanations, and to complete the discussions, Eschelon will, under protest, make sufficient payments on or before June 26, 2006, such that Eschelon's account will be current, net of disputed amounts.[2] In return, Qwest is bound to refrain from taking any action to suspend service order activity and to provide an accounting (including facts verifying what amount is due in each state) from Qwest and prompt credit adjustments as applicable based on that accounting.

Eschelon has little choice to pay these unsubstantiated amounts because of Qwest's threat of "suspending service order activity." As Qwest is well aware, the

[1] The amount will differ from that stated in Qwest's May 25 letter because of payments made but unrecognized in Qwest's calculations and additional disputed amounts.
[2] In the May 25 letter Qwest acknowledged that Eschelon had informed Qwest that the disputed amounts exceeded the amount reflected in Qwest's calculations and asked for confirmation. Eschelon's records show that its outstanding disputed amount with Qwest as of 5/23/06 was $1,179,641.32. Eschelon would remind Qwest that these amounts remain in dispute until either resolved by agreement of both parties or by dispute resolution.

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www.eschelon.com

refusal to process orders is a very serious step that could vitally affect end-users as well as the ongoing viability of a competitor, like Eschelon, who would not get its orders processed. Even assuming action were warranted, Qwest has other remedies, such as late payment fees and dispute resolution, available to it. Eschelon has been a regularly paying customer, in steadily increasing amounts, for a period of approximately ten years. We regularly pay Qwest ***several million dollars per month***, over and above any disputes. Qwest would continue to receive such payments while an orderly dispute resolution proceeding was pending, so any claim of a threat to Qwest or its subscribers is baseless. The ICAs allow Qwest to "pursue" legal and equitable remedies, not commandeer them.

As Qwest well knows, although Eschelon is a multi-million dollar customer of Qwest, Eschelon is still small compared to Qwest. Qwest's revenues and earnings dwarf those of Eschelon. Qwest's revenues in the first week of the year exceed Eschelon's revenues for the entire year. If resources rather than merit determine results, therefore, Qwest wins. Resources should not determine results. With all of its resources, Qwest should be able to provide the explanation and state-specific data needed by Eschelon. Instead of availing itself of the orderly dispute resolution mechanism in our ICAs, Qwest disrupted ongoing discussions of this issue by unexpectedly sending a letter copied to all six commissions declaring alleged default and threatening this drastic action and including gratuitous criticism of Eschelon. Given that the ongoing discussions had not concluded and Qwest has more orderly alternatives available to it, there is no legitimate reason for Qwest to have taken this course.

In conclusion, payment over and above the usual ongoing payments in an amount to bring Eschelon's account current, net of disputed amounts, will be made prior to June 26, 2006. In light of this decision, Eschelon assumes that Qwest will take no action, absent further written notice, to suspend service order activity or otherwise disrupt the provision of services to Eschelon and its customers. Please contact me if you have any questions.

Because Qwest copied the six state commissions with its inflammatory and one-sided letter, Eschelon feels compelled to update the Commissions of the current status of this matter.

Sincerely,

William D. Markert
Executive Vice President, Network
Financial Management
Eschelon Telecom, Inc.
612-436-6265 (direct)
wdmarkert@eschelon.com

cc by email to:

Harisha Bastiampillai, Qwest
Larry Christensen, Qwest
Christopher Gilbert, Eschelon
J. Jeffrey Oxley, Eschelon
Dennis Ahlers, Eschelon
Douglas K. Denney, Eschelon

cc by U.S. mail to:

Arizona Corporation Commission, Utilities Division
Colorado Public Utilities Commission
Minnesota Public Utilities Commission
Oregon Public Utility Commission
Utah Public Service Commission
Washington Utilities and Transportation Commission

EXHIBIT JN-3

EXHIBIT JN-3

Qwest
Spirit of Service™
250 Bell Plaza, Rm 602
Salt Lake City, UT 84111

July 5, 2006

William D. Markert
Executive Vice President
Eschelon Telecom, Inc.
730 Second Avenue South, Suite 900
Minneapolis, MN 55402

Re: Eschelon accounts

Dear Mr. Markert:

Thank you for the payments made by Eschelon Telecom, Inc. ("Eschelon") in response to the letter from Valene Kipp of Qwest Corporation ("Qwest") dated May 25, 2006 ("Default Notice"). As we review Eschelon's accounts in light of the payments made, there are several issues that require immediate attention.

First, it appears that a substantial portion of the payments made by Eschelon in June (almost one million dollars) were made on behalf of Oregon Telecom. That, in combination with the fact that there remains a large discrepancy between our two companies concerning the amounts that each claims is in dispute, creates uncertainty around the status of Eschelon's accounts. According to Qwest's records, Eschelon accounts are over $600,000 in arrears and therefore, remain in default. However, we recognize that, at least in part, this understanding of Eschelon's account status may be caused by the large dispute discrepancy noted above. Therefore, without waiving any rights and without making any final determination as to whether Eschelon has cured the default identified in the Default Notice, Qwest will, for the time being, refrain from taking further collection action against Eschelon. However, this billing dispute discrepancy needs to be reconciled quickly. I have attached a spreadsheet detailing the disputes that Qwest believes are in pending status. We need you to respond, in detail, stating your agreement or disagreement with Qwest's position and further stating with specificity other billing disputes Eschelon claims remain open. We request that you respond by July 17, 2006 so that we may work jointly to reconcile and resolve this large backlog of pending disputes.

On a related matter, Eschelon has recently inquired about Qwest's process for applying billing adjustments. Qwest does not adjust accounts by issuing billing refunds to any carrier with a past due balance. Rather, in that situation, Qwest will apply any credits due and owing to past due balances. While Qwest will refrain from pursuing collection action against Eschelon so long as the issues discussed in the preceding paragraph are being addressed, Qwest is not willing to alter its billing adjustment process under these circumstances. Until Qwest can be reasonably certain that Eschelon's accounts are current, Qwest will not issue refunds but will apply billing credits to Eschelon's accounts when billing

adjustments are necessary. This is yet another reason why resolution of the pending billing disputes is imperative.

Finally, as an administrative matter, Qwest requests that you copy my department, at the address noted above, with the payment remittance sent to the payment center each month with your payments. Many customers do this and it is extremely helpful to us in tracking payments to allow us to more efficiently manage your accounts and, we hope, to avoid many disputes in the future. At a minimum, this should help us in the future to allocate payments between Eschelon and Oregon Telecom.

Thank you for your attention to these matters, we look forward to resolving these matters and working toward an improved relationship.

Sincerely,

Mary Dobesh

EXHIBIT 4

REDACTED

REDACTED

EXHIBIT 5

REDACTED

REDACTED

EXHIBIT 6

REDACTED

EXHIBIT 7

REDACTED

REDACTED

EXHIBIT 8

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EXHIBIT 19

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REDACTED

REDACTED

REDACTED

EXHIBIT 20

REDACTED

REDACTED

REDACTED

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF ESCHELON TELECOM OF ARIZONA, INC.	)	
Complainant,	)	**DOCKET NO. T-03406A-06-0257**
	)	**T-01051B-06-0257**
vs	)	
QWEST CORPORATION	)	
Respondent.	)	
	)	**AFFIDAVIT OF JEAN NOVAK**
STATE OF MINNESOTA	) :	**SS**
COUNTY OF ST. LOUIS	)	

Jean Novak, of lawful age being first duly sworn, deposes and states:

1. My name is Jean Novak. I am a Regional Service Director – Wholesale Markets for Qwest Services Corporation in Virginia, Minnesota. I have caused to be filed written direct testimony in Docket Nos. T-03406A-06-0257 and T-01051B-06-0257.

2. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.

Jean Novak

Jean Novak

SUBSCRIBED AND SWORN to before me this 24th day of August, 2006.

MAUREEN K. KRSEAN
Notary Public-Minnesota
My Comm. Expires Jan. 31, 2010

Maureen K. Krsean

(Notary Public

My Commission Expires: 1-31-2010

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM MUNDELL
Commissioner
MIKE GLEASON
Commissioner
KRISTIN MAYES
Commissioner
BARRY WONG
Commissioner

IN THE MATTER OF THE COMPLAINT OF ESCHELON TELECOM OF ARIZONA, INC. AGAINST QWEST CORPORATION	DOCKET NO. T-03406A-06-0257 DOCKET NO. T-01051B-06-0257

DIRECT TESTIMONY

OF

TERESA K. MILLION

ON BEHALF OF

QWEST CORPORATION

AUGUST 28, 2006

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I. INTRODUCTION

Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH QWEST.

A. My name is Teresa K. Million. I am employed by Qwest Services Corporation, parent company of Qwest Corporation ("Qwest"), as a Staff Director in the Public Policy organization. In this position, I am responsible for directing the preparation of cost studies and representing Qwest's costs in a variety of regulatory proceedings. My business address is 1801 California St., Room 4700, Denver, Colorado.

Q. PLEASE DESCRIBE YOUR EDUCATION BACKGROUND AND EMPLOYMENT EXPERIENCE WITH QWEST.

A. I received a Juris Doctor from the University of Denver, College of Law in 1994 and am licensed to practice law in Colorado. I also have a Master of Business Administration from Creighton University and a degree in Animal Science from the University of Arizona.

I have more than 23 years experience in the telecommunications industry with an emphasis in tax and regulatory compliance. I began my career with Qwest (formerly Northwestern Bell Telephone Company and then U S WEST, Inc.) in 1983. Between 1983 and 1986, I administered Shared Network Facilities Agreements between Northwestern Bell and AT&T that emanated from the divestiture of the Bell System in 1984. I held a variety of positions within the U S WEST, Inc. tax department over the next ten years, including tax accounting, audit, and state and federal tax research and planning. In 1997, I assumed a position that had responsibility for affiliate transactions compliance, specifically compliance with section 272 of the Telecommunications Act of 1996 (the "Act"). 47 U.S.C. § 272. In September 1999, I began my current assignment as a cost

witness. In this position, I am responsible for managing cost issues, developing cost methods and representing Qwest in proceedings before regulatory commissions.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. I have been called upon as a cost expert to explain why, as a premium service, that Qwest is not required to provide competitive local exchange carriers (CLECs) pursuant to the Telecommunications Act of 1996 (the Act), the fee associated with expedited orders does not require Commission approval in a cost docket nor is it required to be priced on a cost basis. Further, I discuss the appropriate basis for the $200 per day Expedited Order Charge.

II. COST BASED PRICING

Q. WHAT IS COST BASED PRICING?

A. There are two common types of cost-based pricing utilized in the telecommunications industry: total element long run incremental cost (TELRIC) and total service long run incremental cost (TSLRIC). TELRIC is an economic costing method that was established by the FCC as a result of the 1996 Telecom Act for use in pricing the unbundled network elements (UNEs) that incumbent local exchange carriers, such as Qwest, are required to provide to CLECs pursuant to Section 251 of the Act. In the case of TELRIC, the ILEC estimates the average cost (including direct, indirect, overhead and common costs) of providing an unbundled element, such as a loop, to a CLEC and the resulting cost is equivalent to the price of the element. TSLRIC is also an economic costing method. However, instead of being equal to the price, it is typically used to determine the *price floor* for retail and some wholesale telecommunications services such as basic local exchange and private line services. In the case of TSLRIC, the ILEC estimates the average direct and indirect cost of providing a

service to its customers. The purpose of TSLRIC is to determine a level of cost above which a given service or group of services is to be priced. The amount of contribution above TSLRIC that is assigned to any given service for purposes of recovering a portion of the ILEC's overhead and common costs varies depending on a number of factors including demand, competitiveness of the service, as well as the social and political pressures society places on the ILEC to provide the service. For example, basic local exchange services provided to residential customers have traditionally been priced only slightly above TSLRIC costs, while private line services provided to business customers are often priced well above TSLRIC and, thus, make a greater contribution to the overhead costs of the ILEC.

Q. WHY ISN'T TELRIC AN APPROPRIATE METHOD FOR DETERMINING THE PRICE FOR EXPEDITING AN ORDER FOR AN UNBUNDLED NETWORK ELEMENT SUCH AS A DS1 CAPABLE LOOP?

A. As I explained above, the application of TELRIC pricing is limited to Section 251 UNEs. The only pricing authority the Act confers upon state commissions is that set forth in Section 252(c)(2), which directs states to set prices *in the exercise of their Section 252 arbitration authority* for interconnection services and UNEs that ILECs provide under Sections 251(c)(2) and (c)(3). Section 252(c)(2) provides specifically that in exercising their arbitration authority, states shall determine "the just and reasonable rate for the interconnection of facilities and equipment for purposes of subsection [251(c)(2)] . . . [and] for network elements for purposes of subsection [251(c)(3)]."[1] As shown by this language, nothing in this section gives states pricing authority over superior services, such as expedited orders, that an ILEC is not required to provide; instead, the authority Congress granted in that section is plainly limited to elements and services that must be provided under Section 251(c). Nowhere in Section 251 is there a requirement for ILECs to

[1] 47 U.S.C. § 252(d)(1).

provide CLECs with superior service. Furthermore, when the FCC tried initially to interpret the Section 251(c)(3) requirement to provide nondiscriminatory access to UNEs as requiring ILECs to provide superior service, the Eighth Circuit struck this language down as violating the Act. It is important to note that that portion of the Eighth Circuit's decision was never disturbed by the United States Supreme Court.[2] In fact, the Florida Commission articulated this point clearly when it said:

> It is clear there is no obligation imposed or implied in Rule 51.311(b) that an incumbent render services to a CLEC superior in quality to those provided to a retail customer requesting similar services. So long as rates are identical for all requesting parties, CLEC and retail alike, parity exists in the provisioning structure for service expedites, and there is no conflict with Rule 51.311(b). We reiterate that current regulations do not compel an ILEC to provide CLECs with access superior in quality to that supplied to its own retail customers.[3]

Thus, because this Commission's authority to apply TELRIC pricing is limited to Section 251 services and elements under the Act, and the service of expediting orders is a superior service not required by Section 251, it would be inappropriate for the Commission to determine a TELRIC-based price for the Expedited Order charge.

Q. WHEN YOU SAY THAT THE COMMISSION'S TELRIC PRICING AUTHORITY IS LIMITED AREN'T YOU TRYING TO TAKE AWAY THE COMMISSION'S JURISDICTION OVER WHOLESALE RATES?

A. No. Clearly the Commission has pricing authority under the Act over Section 251 services and elements. Indeed, Qwest has participated in multiple cost dockets before this Commission where various Section 251 rates were set by the

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[2] *See e.g., Iowa Utilities Board v.* AT&T, 120 F.3d 753, 812-813 (8th Cir. 1997), *aff'd in part and rev'd in part*, 525 U.S. 366, 397 (1999).
[3] *In re Joint Petition by NewSouth et al.*, 2005 Fla. PUC LEXIS 634 *150, Order No. PSC-05-0975-FOF-TP (Fla. PSC Oct. 11, 2005).

Commission. These rates are the rates associated with Qwest's universal service order codes (USOCs), and are the rates charged by Qwest to CLECs in Arizona. Qwest is not trying to modify any of these rates. These rates are completely separate from the expedite charge at issue in this proceeding.

The FCC's list of Section 251 elements is generally limited to those elements and services that are necessary for a CLEC to be able to compete with the ILECs on an equal footing. In cases where the FCC has found that access to a specific element in the ILEC's network is not required, the ILEC is free to negotiate a non cost-based rate with the CLECs. For example, as a part of its Triennial Review Remand Order (TRRO), the FCC determined that the ILECs were no longer required to provide CLECs with access to unbundled switching or shared transport at TELRIC rates, effectively eliminating the Section 251 product that up until then had been referred to as UNE-P. As a result, Qwest negotiated commercial agreements with the CLECs and began offering a non-Section 251 product called Qwest Platform Plus (QPP) at a price that combined both TELRIC and non-TELRIC rates.

As discussed above, because the service of expediting an order is a superior service that allows a CLEC to circumvent the standard installation intervals provided for UNEs, which are already installed on shorter intervals than Qwest provides for its retail customers, it cannot be considered a Section 251 service. Further, the Commission has jurisdiction generally to determine whether Qwest's other rates, including its wholesale rates, are just and reasonable under the Arizona Price Cap Plan. In fact, the Expedite Order Charge that Qwest uses for its CLEC customers is the same rate, and is assessed under the same terms and conditions, as the charge for expedites that currently exists for both Qwest's retail and wholesale customers in Arizona. Thus, the Expedite Order Charge that exists in Qwest's tariffs, including the Access Service Price Cap Tariff and Price List, the Competitive Private Line Transport Services Price Cap Tariff, and the

Exchange and Network Services Price Cap Tariff (among others), has already been deemed to be just and reasonable by this Commission's acceptance of it in multiple tariffs under the same terms and conditions for Qwest's other customers who wish to leapfrog ahead of other customers with their installation requests.

Q. WHY ISN'T TSLRIC AN APPROPRIATE COST-BASED METHOD FOR DETERMINING THE PRICE FOR EXPEDITING AN ORDER?

A. The reason that TSLRIC cannot be used to "determine the price" for the Expedited Order Charge is that the purpose of TSLRIC is not to determine a price but, rather, to establish a price floor for a service. This means that as long as the service is priced at some level above its direct and indirect costs (i.e., its TSLRIC) then the purpose of TSLRIC has been met. In the case of the Expedited Order Charge, the way to establish the appropriate level above TSLRIC for pricing the service is for Qwest to determine the value of an expedite based on what the market will bear. Qwest went through that process when it sought, and received, Commission acceptance of $200 per day as the charge for expediting an order for its retail and wholesale customers in its tariffs.

Q. DID QWEST GENERATE A TSLRIC COST STUDY TO DETERMINE THE MINIMUM RATE THAT QWEST MUST CHARGE TO ENSURE THE SERVICE IS ABOVE COST?

A. Yes. Qwest determined that the minimum floor that it could charge for performing an expedite was $123.08. ***See Confidential Exhibit TM-1.*** Qwest opted to charge $200 per day for expedites, the exact same amount utilized by BellSouth to perform the exact same work.

Q. HAS ESCHELON PROPOSED A COST-BASED RATE FOR THE EXPEDITE ORDER CHARGE?

A. No. Eschelon is currently involved in arbitration proceedings with Qwest in both Minnesota and Washington, and while its witness in this proceeding argues that TELRIC rates should apply for expedites, in those states, Eschelon is seeking a $100 per day expedite charge. The charge proposed by Eschelon in those proceedings is not supported by any sort of cost-based study, TELRIC or otherwise, and is merely an arbitrary amount. Thus, it would appear that in spite of testimony to the contrary, Eschelon is not truly interested in establishing a cost-based rate, but instead is looking for a way to advantage itself and its customers over Qwest and Qwest's retail and other wholesale customers.

III. THE EXPEDITED ORDER CHARGE

Q. WHAT IS THE APPROPRIATE BASIS FOR THE $200 EXPEDITED ORDER CHARGE?

A. The fee for an expedited order is payment to Qwest for the value of a premium or superior service that it provides to the CLECs and its retail and other wholesale customers, alike. It is not based on cost, although Qwest incurs costs to process a request for an expedited order, as well as time and resources to work the order into an existing provisioning schedule, coordinate activities among the several Qwest departments that are involved in the installation process, and communicate with the customer regarding the status of the order. However, the value of an expedited order is the intangible benefit of a superior service provided to the customer by Qwest, i.e. the ability to go to the head of the line and leapfrog over the other customers whose orders are already in queue. If Qwest did not charge its customers for the value they receive in going to the head of the line, it would be unfairly advantaging those customers to the detriment of other customers. By making expedites available to all of its

customers, for a fee, every customer has the same ability as every other customer to decide for themselves how important it is to them to expedite their orders. Obviously, it would be impossible for Qwest to expedite every order. Thus, Qwest sets a price for obtaining superior service that guarantees that only those customers for whom the priority to expedite an order is very high will request the service.

Q. ARE THERE SIMILAR EXAMPLES IN EVERYONE'S COMMON EXPERIENCE THAT COULD HELP EXPLAIN THIS CONCEPT?

A. Yes. Take a concert, for example. Whether it is a rock concert, a symphony or a country and western concert, they all have one thing in common, concert-goers pay a premium for seats that are up front and closer to the stage than they do for seats that are in the back and farther away from the stage. And while it does not cost any more to produce a show for the people in the front row than it does to produce a show for the people in the last row, it is not unusual for the people in the front row to pay a ticket price that is two or three times higher than the price for back-row tickets. The reason some concert-goers are willing to pay the higher price is because they perceive enough value in being close to the stage to make it worth paying the premium fee. Other concert-goers are willing to sit farther away to pay a lower price. The same is true of expedite charges; some customers, including CLECs, are willing to pay a premium in order to receive what they perceive to be the superior service of shortening their installation interval and moving to the head of the line. Other CLECs are satisfied to accept the standard installation interval and forego paying the additional fee. Each CLEC makes the choice to pay the fee or not on the basis of the perceived value to their business to expedite orders. This is no different than the decision process that Qwest's retail and other wholesale customers go through when they determine whether or not to pay the $200 per day fee to expedite their installation orders.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A. Yes, it does.

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
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IN THE MATTER OF THE COMPLAINT OF ESCHELON TELECOM OF ARIZONA, INC. AGAINST QWEST CORPORATION	DOCKET NO. T-03406A-06-0257 DOCKET NO. T-01051B-06-0257

EXHIBITS

OF

TERESA K. MILLION

ON BEHALF OF

QWEST CORPORATION

AUGUST 28, 2006

Arizona Corporation Commission
Docket No. T-03406A-06-0257
Docket No. T-01051B-06-0257
Qwest Corporation – Confidential TKM-1
Exhibits of Theresa K. Million

EXHIBIT TKM-1

REDACTED

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF ESCHELON TELECOM OF ARIZONA, INC.	)	
Complainant,	)	
vs	)	**DOCKET NO. T-03406A-06-0257** **T-01051B-06-0257**
QWEST CORPORATION	)	
Respondent.	)	
	)	**AFFIDAVIT OF TERESA K. MILLION**
STATE OF COLORADO	) :	**SS**
COUNTY OF DENVER	)	

Teresa K. Million, of lawful age being first duly sworn, deposes and states:

1. My name is Teresa K. Million. I am a Staff Director – Public Policy for Qwest Services Corporation in Denver, Colorado. I have caused to be filed written direct testimony in Docket Nos. T-03406A-06-0257 and T-01051B-06-0257.

2. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.

Teresa K. Million

Teresa K. Million

SUBSCRIBED AND SWORN to before me this 24th day of August, 2006.

Catherine I. Hansen

Notary Public

My Commission Expires:

CATHERINE I. HANSEN NOTARY PUBLIC STATE OF COLORADO

My Commission Expires July 25, 2008