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

DOCKET NO. T-00000B-97-0238

**QWEST'S COMMENTS AND EXCEPTIONS TO THE  
ADMINISTRATIVE LAW JUDGE'S RECOMMENDED ORDER ON  
CHECKLIST ITEM 11 (LOCAL NUMBER PORTABILITY)**

**INTRODUCTION**

Qwest Corporation submits these Comments and Exceptions to the Administrative Law Judge's ("ALJ") Recommended Order on Checklist Item 11, local number portability ("Recommended Order"). Qwest's Exceptions relate principally to the first disputed issue: AT&T's demand that Qwest should adopt an automated check on the Number Portability Administration Center ("NPAC") before it disconnects a number being ported to another carrier (the so-called "BellSouth Solution"). On the remaining two disputed issues, Qwest clarifies that it has already incorporated SGAT language in its January 17, 2002 SGAT to address the issues based upon language developed with Cox Communications. Qwest requests that the Commission approve this SGAT language.

On the first disputed issue, the ALJ recommends that the Commission reserve the right to reopen this issue at a later unspecified date, and requires Qwest to "continue to cooperate with

Staff in evaluating an automated system." In making these determinations, and in recommending "AT&T's" SGAT language for Sections 10.2.2.4<sup>1</sup> and 10.2.5.3.1, the ALJ makes several factual errors in the Recommended Order. As discussed below, Qwest has already implemented an automatic (*not* manual) industry-recommended solution to ensure that customers are not disconnected when the CLEC fails to perform its provisioning work on time. Qwest is reporting its performance under the TAG-approved OP-17 PID, and that performance demonstrates that Qwest is exceeding the benchmark for the OP-17 PID in every state. This is not interim or preliminary data, but data reported in Qwest's posted performance results. Finally, Qwest has provided Staff with an analysis of the costs of the AT&T-proposed "BellSouth Solution," and those costs are extraordinary given Qwest's adoption of an industry-recommended mechanized solution and its excellent performance. There is simply no basis to require Qwest to pursue a different solution when the industry has endorsed Qwest's solution and it is working successfully.

The ALJ also inappropriately recommends adoption of "AT&T's" proposed language for Sections 10.2.2.4 and 10.2.5.3.1. As an initial matter, AT&T does not appear to have proposed language for Section 10.2.2.4 – at least the ALJ does not quote such language in the Recommended Order. Regardless, Qwest has agreed to eliminate text from Section 10.2.2.4 that could cause confusion and to define and clarify the notification and delayed disconnect process in detail in Section 10.2.5.3.1. Although AT&T proposed language for Section 10.2.5.3.1 that is very similar to language Qwest agreed to include to the Colorado SGAT, as set forth below, AT&T conveniently omits two key terms that maintain the consistency between the SGAT, Qwest's process, and the OP-17 PID. Upon review of Qwest's proposed language for Section 10.2.5.3.1, the Colorado Hearing Commissioner determined that Qwest's language "describes in clear and understandable terms what the respective responsibilities and obligations of the parties

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<sup>1</sup> As discussed below, Qwest is unclear what AT&T language the ALJ endorses. The ALJ does not quote any AT&T-proposed language for this provision in the Recommended Order.

are with respect to this issue."<sup>2</sup> The Arizona Commission should do likewise. Qwest's proposed language is consistent with both Qwest's processes and policy for CLEC notifications and the TAG-approved OP-17 PID.

In addition, the ALJ's Recommended Order incorrectly assumes that Qwest has agreed to accept late notifications up to 8:00 p.m. on the date following the due date. It has not. Qwest's published policies require timely notice to be provided at 8:00 p.m. MTN on the due date. Qwest will accept *late* notifications up to 12:00 noon MTN on the day after the due date.

As set forth fully below, Qwest respectfully requests that the Commission accept Qwest's proposed SGAT language and close all disputed issues.

### EXCEPTIONS

#### A. **Qwest's Delayed Disconnect Process Is An Industry-Recommended Automated Solution. It Is Not Manual.**

Qwest will not repeat the entirety of its February 8, 2002 Filing On LNP Cost Estimates Pursuant To Staff's Report On Checklist Item 11 ("February 8 Filing") addressing Staff's request that Qwest investigate the costs of implementing the "BellSouth solution" and describing Qwest's automated delayed disconnect solution. Rather, Qwest incorporates that response by reference. However, Qwest is compelled to point out several factual errors in the ALJ's Recommended Order.

First, the ALJ states in paragraph 34 of the Recommended Order that Qwest should "continue to cooperate with Staff in evaluating an automated system . . . Furthermore, in the future, as CLEC volumes increase, a manual system may not be as effective as it may be in the early stages of competition." The delayed disconnect process that Qwest has implemented is *not* a manual system; it is a *mechanized* or *automated* solution to hold the disconnect of switch translations associated with LNP orders until 11:59 p.m. on the day following the due date. *See*

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<sup>2</sup> *In the Matter of the Investigation Into U S WEST Communications, Inc.'s Compliance With § 271(c) of the Telecommunications Act of 1996*, Docket No. 97-198T, Decision No. R02-115-I at 9 (Colo. Hearing Commissioner, Feb. 1, 2002).

Affidavit of Maureen L. Callan, attached to Qwest's February 8 Filing, ¶ 9 ("In March 2001, Qwest began work on an *automated downstream system process* to hold the disconnection of the switch translations associated with LNP orders. With this process, the APRIL (provisioning) system identified and intercepted the eligible port orders. The Due Date was extended for each port order, prior to sending the order to the MARCH (activation) system."); ¶ 10 ("Effective Monday, August 20, 2001, with IMA Release 8.0, *further automation allowed the LNP port orders to be issued with a delayed disconnect date*, and an Effective Bill Date ("EBD") was established consistent with the CLEC's requested Due Date. With this release, both the switch translations and SOPs order completion are delayed. Qwest then discontinued the MARCH/APRIL interim solution."). Because the solution Qwest has implemented is, in fact, automated, the ALJ's recommendation that Qwest should continue to pursue an "automated" solution with Staff is misplaced. As set forth in Qwest's previous filings, what AT&T has really advocated in the workshops is that Qwest adopt *AT&T's preferred* automated solution. However, it bears repeating that no state commission has ordered Qwest to adopt the "BellSouth solution," and no FCC order has conditioned Section 271 approval on adoption of that process.

Furthermore, as discussed in paragraph 13 of Ms. Callan's affidavit, Qwest's automated process is one of the three industry-approved processes for addressing the disconnect issue. Attached hereto as Exhibit 1 is the LNP guidelines approved by the Local Number Portability Administration ("LNPA") Working Group, of which AT&T is a member and Co-Chairperson, approving Qwest's automated delayed disconnect process to address customer disconnects in a number portability scenario. Thus, the mechanized solution Qwest has implemented meets the needs of competitors today, as demonstrated by Qwest's outstanding performance results, and will continue to do so in the future. It is not an interim or manual solution as the ALJ's Recommended Order incorrectly states, but an automated solution the industry recommended just last month.

The OP-17 PID was developed and approved by the TAG to evaluate Qwest's performance in completing number ports, and focuses on the degree to which porting occurs without implementing associated disconnects before the scheduled date and time. Under the PID, the scheduled date/time is defined as 11:59 p.m. on either the due date of the LNP order recorded by Qwest or the delayed disconnect date requested by the CLEC, where the CLEC submits a timely request for delay of disconnection. The TAG participants agreed upon a benchmark of 98.25%. Thus, the OP-17 PID measures precisely the concern AT&T raised in the workshops.

Qwest previously presented the Commission with Qwest's performance results for OP-17 in October through December, 2001 in its February 8 Filing. Those results demonstrated that Qwest was exceeding the OP-17 benchmark of 98.25% in all states in all three months. Qwest's January 2002 performance in Arizona continues the excellent results: in Arizona, Qwest met 100% of its commitments under the OP-17 PID in January 2002. Regionally in January 2002, Qwest met its commitment 99.98%. Thus, again, Qwest exceeded the benchmark both in Arizona and regionally.

The TAG has established a PID that measures Qwest's performance in porting numbers without disconnecting service prior to the scheduled due date. Qwest is reporting its results under the PID, and it is exceeding the agreed-upon benchmark in Arizona and every other state. Given that Qwest has implemented an industry-recommended solution, and its performance is near-perfect, it is difficult to fathom why AT&T (alone) continues to pursue this issue. Qwest can only assume that AT&T is attempting to foist onto Qwest the nominal costs of providing notice to Qwest that AT&T has been unable to complete the provision of service to its new customer on the date originally scheduled by AT&T, and to request a postponement of the termination of service by Qwest. This only requires notification on those orders AT&T is unable to complete on the due date, not all orders. Under AT&T's view, Qwest must not only incur the costs of implementing a different (but not demonstrably better) solution, but also assume the

costs of polling the NPAC database for days (perhaps even weeks) to determine if and if so, when, AT&T has completed its provisioning before Qwest can disconnect service and reuse facilities. AT&T would avoid the nominal cost of communicating to Qwest a request to reschedule the Qwest disconnection of service and the responsibility to do so in a timely manner. AT&T cannot shift its costs to Qwest any further. Qwest has implemented an automated, industry recommended solution to address the disconnect issue. Indeed, AT&T was a key member of the industry participants that approved that solution. Based upon Qwest's implementation of this automated industry-recommended solution and Qwest's excellent performance results, the Commission should find that Qwest has fully addressed this issue.

**B. The Commission Should Adopt Qwest's Proposed Modifications To The SGAT Language.**

In paragraph 34, the ALJ recommends that the Commission approve "AT&T's" recommended SGAT language for Sections 10.2.2.4 and 10.2.5.3.1 of the SGAT. The ALJ states that "AT&T's proposed SGAT language [for these sections] is more complete than Qwest's proposed language, and should be adopted, except that it is our understanding that Qwest has offered to receive late notification up until 8:00 p.m. on the date after the Due Date (as opposed to noon) to ensure that the end user's service is not disconnected that day." Recommended Order ¶ 34. Because the ALJ does not quote AT&T's proposed language for Section 10.2.2.4, and AT&T appears to have proposed language only for Section 10.2.5.3.1, Qwest assumes that the ALJ intended to endorse AT&T's proposed language for Section 10.2.5.3.1 in lieu of Qwest's proposed language for Section 10.2.2.4.

To resolve this issue in Colorado, Qwest agreed to revise Section 10.2.2.4 to eliminate the final sentence that appears to be the source of contention between AT&T and Qwest. Specifically, Qwest proposed the following revision in Colorado and would propose the same SGAT revision in Arizona:

Qwest will coordinate LNP with Unbundled Loop cut overs in a reasonable amount of time and with minimum service disruption, pursuant to Unbundled Loop provisions identified in Section 9 of this Agreement.

CLEC will coordinate with Qwest for the transfer of the Qwest Unbundled Loop coincident with the transfer of the Customer's telephone service to Qwest in a reasonable amount of time and with minimum service disruption. For coordination with Loops not associated with Qwest's Unbundled Loop offering, CLEC may order the LNP Managed Cut, as described in Section 10.2.5.4. ~~If CLEC requests Qwest to do so by 8:00 p.m. (mountain time), Qwest will assure that the Qwest Loop is not disconnected that day.~~

To clarify its commitments, Qwest further proposed SGAT language in Colorado for Section 10.2.5.3.1. In its January comments on Staff's report on checklist item 11, AT&T proposed virtually identical language to that which Qwest submitted in Colorado. However, AT&T omitted two key words. Qwest's SGAT language as proposed and approved in Colorado is set forth below. Qwest has marked the two words AT&T omitted:

Qwest will set the ten (10) digit unconditional trigger for numbers to be ported, unless technically infeasible, by 11:59 p.m. (local time) on the business day preceding the scheduled Port date. (A 10-digit unconditional trigger cannot be set for DID services in 1AESS, AXE10, and DMS10 Switches thus managed cuts are required, at no charge.) The ten (10) digit unconditional trigger and Switch translations associated with the End User Customer's telephone number will not be removed, nor will Qwest disconnect the Customer's Billing and account information, until 11:59 p.m. (local time) of the next business day after the Due Date. CLEC is required to make timely notifications of Due Date changes or cancellations by 8:00 p.m. mountain time on the Due Date through a supplemental LSR order. In the event CLEC does not make a timely notification, CLEC may submit a late notification to Qwest as soon as possible but in no event later than 12:00 p.m. mountain time the next business day after the Due Date to Qwest's Interconnect Service Center in the manner set forth below. For a late notification properly submitted, Qwest agrees to try to ensure that the End User's service is not disconnected prior to 11:59 p.m. of the next business day following the new Due Date or, in the case of a cancellation, no disruption of the End User's existing service. Late notifications must be made by calling Qwest's Interconnect Service Center followed by CLEC submitting a confirming supplemental LSR order.

In Decision No. R02-115-I, the Colorado Hearing Commissioner found that this language clearly defines the obligations of the parties, is reasonable, and satisfies Qwest's obligations under checklist item 11.

Qwest's request that the Commission accept its version of Section 10.2.5.3.1 is well placed. First, contrary to AT&T's statements in its briefs, Qwest's process and policy for addressing delayed disconnects explicitly require "timely" notification to be made by 8:00 p.m. MTN on the due date. "Late notification" is to be provided by 12:00 p.m. on the date following the due date. In response to a September 2001 CMP request from AT&T to clarify Qwest's LNP disconnect process, Qwest made this crystal clear. See Exhibit 2. As this November Change Request response plainly states, timely notification of due date changes and cancellations is provided as soon as possible and prior to 8:00 p.m. on the due date. "Late notification" is notification any time thereafter and should be provided prior to 12:00 p.m. on the following day. Qwest discussed its new process with CLECs in CMP conference calls in October 2001 and posted its final Change Request response on its website in November.<sup>3</sup> Thus, several months ago, Qwest reiterated that its process provides that timely notice is received by 8:00 p.m. on the due date.

Moreover, Qwest's language tracks the TAG-approved PID for OP-17. The OP-17 PID states that "A CLEC request for delay of disconnection is considered *timely* if received by Qwest before 8:00 p.m. on the current due date of the LNP order recorded by Qwest." (Emphasis added). AT&T has claimed that this PID is not consistent with Qwest's processes and that AT&T has submitted revisions to the OP-17 PID. What AT&T fails to mention, however, is that the TAG has not agreed upon or approved a PID revision. Thus, as it now stands, the OP-17 PID and Qwest's proposed SGAT text for Section 10.2.5.3.1 consistently define *timely* notification as notification that is received by 8:00 p.m. on the due date. Adoption of AT&T's proposed SGAT language will make *untimely* notification the norm. It bears repeating that the CLEC, not Qwest, is responsible for the CLEC's business processes, including provisioning service on the due date and notifying Qwest of any delays. The rationale for holding the switch translations until 11:59

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<sup>3</sup> Such notices are posted on Qwest's website at: <http://www.qwest.com/wholesale/notices/>.

p.m. on the day following the due date was driven *not* by the CLECs' inability to provide prompt notice, but a concern for ensuring that customers are not disconnected. Under AT&T's proposal, however, end users are again at risk of disconnect. With late notice the norm, Qwest may not have sufficient time to prevent the disconnect. To ensure that customers are not disconnected, Qwest's SGAT properly requires timely notice on the due date.

AT&T, through SGAT revisions, is attempting to redefine both the PIDs and the process for providing timely notice of due date changes. The TAG has approved a PID that defines timely notification and that measures Qwest's performance based upon timely notification in a manner that is consistent with Qwest's proposed language and Qwest's processes. AT&T's proposed PID revisions have not been adopted. Accordingly, it would be inappropriate to adopt AT&T's revisions. Indeed, to date, no other Commission has ordered them.

For these same reasons, the ALJ is incorrect in stating that Qwest has offered to receive late notification up until 8:00 p.m. on the date following the due date.<sup>4</sup> Rather, as discussed above, Qwest has consistently informed CLECs that notification should be provided on the due date, but agreed to accept late notification up until *12:00 p.m. (noon)* on the date following the due date. It has not agreed to accept notification as late as 8:00 p.m. on the date following the due date, nor should such seriously untimely notification be endorsed. If the Commission's goal is to ensure that customers are not disconnected, timely notification on the due date of a need to delay the disconnect should be the norm.

The Commission should find that the issue of Qwest's automated process for delaying disconnects is closed. Furthermore, the Commission should accept Qwest's recommended SGAT language for Sections 10.2.2.4 and 10.2.5.3.1.

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<sup>4</sup> This mistake may be based upon an inadvertent typographical error in Qwest's Supplementation of the Record on this checklist item. Qwest apologizes for the confusion.

**C. Qwest Has Already Incorporated Language To Address The Issue of Rescinding FOCs and Restoration of Service.**

On the remaining two disputed issues, Qwest notes that in the Arizona SGAT filed on January 17, 2002, Qwest proposed SGAT language for Section 10.2.5.5 that is based upon language Qwest negotiated with Cox Communications. Specifically, Qwest proposed the following SGAT text:

10.2.5.5 Qwest shall assure that business processes are in place to ensure that: a) CLEC LNP LSRs are rejected only for reasons previously specified by Qwest as proper reasons for rejection; and, b) FOCs for CLEC LNP orders are not rescinded, unless mutually agreed to by the Parties or if the CLEC is unable to respond within four (4) business hours to Qwest's notification to the CLEC regarding a specific LSR. Reserved for Future Use.

Qwest's proposed language is very similar to Staff's proposed language, with the addition of the final clause of the last sentence. This clarification is necessary because Qwest needs some time boundary on receiving a response from the CLEC. Qwest requires a CLEC response within a reasonable timeframe so that the parties can resolve any outstanding issues without jeopardizing the CLEC's due date and to enable Qwest to process the service order to ensure timely provisioning. In negotiations with Qwest, Cox agreed that four business hours was a reasonable time frame for receiving a response.

Similarly, Qwest has already proposed SGAT language to address the third and final disputed issue, the process for restoration of customer service. Again, Qwest included proposed SGAT language in its January 17, 2002 SGAT filing based upon language negotiated with Cox Communications, the CLEC raising this issue, and clarification provided in Arizona Staff's Final Report on Checklist Item 11. Qwest's proposed SGAT language appears in Section 10.2.6.3.1 as follows:

10.2.6.3.1 If a telephone number has been inadvertently disconnected in the Qwest sSwitch prior to the pPort being activated by the CLEC on the ~~due date~~Due Date or the next business day after the ~~due date~~Due Date, Qwest shall take expeditious action to restore the sSwitch translations and the ten (10) digit unconditional trigger for the eEnd #User eCustomer's

telephone number. For LSRs involving residential service (i.e., IFR) LNP-only (i.e., LNP with a CLEC-provided loop), Qwest shall restore the sSwitch translations and the ten (10) digit unconditional trigger within four (4) business hours of notification by the CLEC when such notification is received on the ~~due date~~Due Date or prior to the end of the next business day after the ~~due date~~Due Date.

The ALJ's Recommended Order states that Qwest has agreed to restore service in a four-hour timeframe in other interconnection agreements. Recommended Order ¶ 51. Qwest's proposed SGAT language tracks that commitment. The Commission should adopt this SGAT language and find that Qwest has addressed this issue satisfactorily.

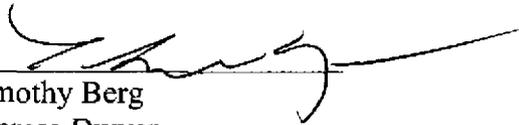
### CONCLUSION

On the first disputed issue for checklist item 11, the Commission should find that Qwest's efforts to prevent disconnects prior to CLEC completion of CLEC provisioning are sufficient and satisfy Qwest's obligations under checklist item 11. Four months of reported performance results show that Qwest is exceeding the OP-17 benchmark each month in every state. Furthermore, the industry has endorsed Qwest's automated delayed disconnect process. Accordingly, the Commission should reject the ALJ's recommendation that Qwest be required to study an alternative form of mechanization. The Commission should also reject the ALJ's recommended SGAT language for Sections 10.2.2.4 and 10.2.5.3.1 and adopt Qwest's similar language which has been approved in Colorado and more accurately tracks Qwest's processes and the OP-17 PID. Finally, the Commission should find that Qwest's proposed SGAT language for Sections 10.2.5.5 and 10.2.6.3.1 included in the January 17, 2002 SGAT satisfactorily resolve the remaining two disputed issues under this checklist item.

Qwest respectfully requests that the Commission recommend that Qwest meets the requirements of Checklist Item 11 in Arizona.

DATED: February 22, 2002

Respectfully submitted,



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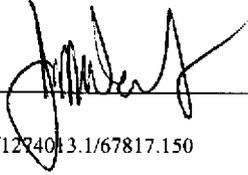
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[revised 2002-02-07]

## Provisioning With Unconditional 10-Digit Trigger

## Figure 3

## Flow AA

6. NPAC SMS records date and time in history file.	<ul style="list-style-type: none"> <li>The NPAC SMS records the current date and time as the Activation Date and Time stamp, after all Local SMSs successfully acknowledged receipt of new subscription version.</li> </ul>
7. NPAC SMS logs failures and non-responses and notifies the Old and New Service Providers of failures.	<ul style="list-style-type: none"> <li>The NPAC SMS resends the activation to a Local SMS that did not acknowledge receipt of the request. The number of NPAC SMS attempts to resend is a tunable parameter for which the current default is three (3) attempts. Once this cycle is completed NPAC personnel investigate possible problems. In addition, the NPAC sends a notice via SOA interface to both the Old and New Service Providers with a list of Local SMSs that failed activation.</li> </ul>
8. All Service Providers update routing databases (real time download).	<ul style="list-style-type: none"> <li>This is an internal process and is performed in accordance with the Service Control Point (SCP) Applications and GTT Function for Number Portability requirements as defined by T1S1.6.</li> </ul>
9. Old Service Provider removes appropriate translations.	<ul style="list-style-type: none"> <li>After update of its databases, the old Service Provider removes translations associated with the ported TN. The removal of these translations (1.) will not be done until the old Service Provider has evidence that the port has occurred, or (2.) will not be scheduled earlier than 11:59 PM of the day after the due date, or (3.) will be scheduled for 11:59 PM on the due date, but can be changed by an LSR supplement received no later than 9:00 PM local time on the due date. This LSR supplement must be submitted in accordance with local practices governing LSR exchange, including such communications by telephone, fax, etc.</li> </ul>
10. New Service Provider may verify completion.	<ul style="list-style-type: none"> <li>The New Service Provider may make test calls to verify that calls to ported numbers complete as expected.</li> </ul>
11. END	



**Qwest.**

Wholesale Product/Process  
Final Response

November 06, 2001

Ms. Terry Bahner  
Ms. Donna Osborne-Miller  
AT&T Communications

This letter is in response to CLEC Change Request PCCR090401-4, dated September 4<sup>th</sup>, 2001, title of change: Clarify Qwest's process on completing LSR's day after due date. This Change Request pertains to the implementation of the new LNP process involving stand alone LNP port out service order requests.

Description of Change as noted in CR: QWEST notified CLEC community LSRS would complete orders day after at 11:59 pm of install date to coincide with disconnects in switch.. Qwest escalation center is stating that orders can start closing as early as 3pm with the possibility of closing even sooner with disconnect to follow. Interconnect has stated that if Qwest determines that there is a large volume of orders to close, they can decide a random time to start the process. AT&T would like to understand why this time frame fluctuates if the closing of these orders causes the disconnect in the switch to shift to an earlier time. AT& T is requesting a flow chart or documentation explaining and listing the backend systems for this process.

Implementation of this Qwest business process change was included in the IMA 8.0 release and was deployed effective August 20<sup>th</sup>, 2001.

The change is as stated: The ten (10) digit unconditional trigger and switch translations associated with the end user customer's telephone number will not be removed, nor will Qwest disconnect the customer's billing and account information, until 11:59p.m. (local time) of the next business day after the due date. Internal Qwest systems have been adjusted to accommodate this process change.

- Order completion and disconnect of translation's will **not** occur prior to 11:59 p.m. the next business day following the due date.
- The subscription date to ASMS is sent to match the CLEC requested due date as available per the standard interval guide.
- The FOC is sent and matches the ASMS subscription date requested by the CLEC as available per the standard interval guide.
- An effective billing date to discontinue account billing is added to the order to match the actual port subscription date as requested by the CLEC and as available per the standard interval guide.
- Additional notification and a reminder of this current process was sent to the Interconnect Center's through an internal communicator dated 10/29/01. The title was "Qwest response to Clec questions concerning the current LNP Port Out process of holding switch translations and order completion until the next business day at 11:59pm."

Exhibit 2

- The process agreement is as stated: The ten (10) digit unconditional trigger and switch translations associated with the end user customer's telephone number will not be removed, nor will Qwest disconnect the customer's billing and account information, until 11:59p.m. (local time) of the next business day after the due date.

**For due date changes or cancellation's on existing LSR's the following process should be followed:**

**Due Date Changes**

- You must notify Qwest via LSR supplement or notification to the ISC if you require a DD change for your port activity
- Notifications of DD changes via a LSR supplement should be made as soon as possible on the DD and prior to 8:00 PM Mountain Time.
- Late notification of DD changes will require that you call the ISC prior to 12:00 noon on the day after the DD (in the end-users' time zone) and issue a LSR supplement via IMA or IIS to confirm the request. If the port due date falls on a Saturday, the CLEC should notify the ISC no later than the following Monday by noon of the DD change.
- Late DD change notifications after 12:00 noon the day after the DD, will require you to contact the Call Center Representative at 888-796-9087 to initiate an escalation ticket for these late changes. The CLEC should also issue a LSR supplement via IMA or IIS to confirm the request. The CLEC should also issue a LSR supplement via IMA or IIS to confirm the request.

**Cancels**

- You must notify Qwest via LSR supplement or notification to the ISC if you require a cancel of the port activity.
- Notifications of DD cancels via a LSR supplement should be made as soon as possible on the DD and prior to 8:00 PM Mountain Time.
- Late notification of DD cancels will require that you call the ISC prior to 12:00 noon on the day after the DD (in the end-users time zone) and issue a LSR supplement via IMA or IIS to confirm the request. . If the port due date falls on a Saturday, the CLEC should notify Qwest no later than the following Monday by noon of the cancellation.
- Late cancel notifications after 12:00 noon the day after the DD will require you to contact the Call Center Representative at 888-796-9087 to initiate an escalation ticket for these late cancels. The CLEC should also issue a LSR supplement via IMA or IIS to confirm the request.

Qwest Interconnect Service Center hours of operation to support the functions described above are:  
6 AM to 8 PM Mountain Time, Monday-Friday  
7 AM to 5 PM Mountain Time on Saturday

With the implementation of this new process, the CLEC is still responsible for notifying Qwest if they are unable to meet their requested port due date. Service order completion and disconnect of switch translation's are not scheduled to occur anytime prior to the 11:59 p.m. time frame the next business day following the due date. However, the port subscription message was sent for the initial CLEC desired due date and changes or cancellation's must occur as outlined above or as noted in the supplement information listed in the Product catalog.

Sincerely,

Joan Wells  
Process Manager Local Number Portability

CC:  
Margaret Bumgarner  
Lorna Dubose

Exhibit 2

Constance Overly  
Kate Spry  
PHX/TBERG/1274016.1/67817.150