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Commissioner

FEB 20 2002

MARC SPITZER
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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

[PUBLIC VERSION]

**QWEST'S VERIFIED RESPONSE TO AT&T'S MOTION TO REOPEN
AND SUPPLEMENT THE RECORD ON CHECKLIST ITEM 7 (911)**

INTRODUCTION

Qwest submits this Response to AT&T's Motion to Reopen and Supplement the Record on Checklist Item 7 (access to 911).¹

AT&T seeks to reopen the record relating to checklist item 7(I), access to 911/E911 services, claiming that Qwest has failed to unlock "hundreds" of records in the E911 database where AT&T has captured the customer and the customer has chosen to port its telephone number to AT&T. AT&T further claims that Qwest cannot be found in compliance with checklist item 7(I) until it puts processes in place to address AT&T's claims.

¹ The factual information in this response is verified by Ms. Margaret S. Bumgarner, who testified in the workshop proceedings on Qwest's compliance with checklist item 7.

Qwest does not dispute the importance of ensuring that 911/E911 services are provided reliably and in a nondiscriminatory fashion. It has demonstrated its commitment to do so in the SGAT and the workshop proceedings in which all issues relating to this checklist item were resolved collaboratively by the parties. However, AT&T's Motion to Reopen and Supplement the Record does not raise the public interest issues AT&T claims. Based upon records Qwest has obtained from Intrado, AT&T does not have "hundreds" of locked records that it is unable to update. AT&T's claims are significantly overstated and, in fact, only nine AT&T records are locked to Qwest.

As Intrado's records demonstrate, AT&T has only 37 locked records. Roughly 65% of those records are for numbers that have not been ported. In other words, for the majority of these records, AT&T did not complete the provisioning work for these customers, and the number was not activated in the number portability database. Such incomplete processing can occur for a variety of reasons: because the customer cancelled the order, the customer delayed the due date, or AT&T personnel were unable to complete their provisioning of the service. Whatever the reason, for these numbers that were not ported, there is no completed work and, therefore, the E911 database should not be updated. For four of the locked records, the records are locked to another CLEC, not Qwest. Only nine records that have been ported are locked to Qwest, and Qwest has asked Intrado to unlock those records. Thus, AT&T has significantly overstated the number of records that are locked to Qwest in Arizona.

Putting aside AT&T's unsupported assertions, Qwest still believes that it is important to permit carriers to update the E911 database in a timely fashion. Indeed, this is an issue that affects all carriers, since some of the "locked" AT&T records are locked to other carriers. Accordingly, Qwest is already in the process of implementing December 2001 draft recommendations of the National Emergency Number Association ("NENA") to address locked records. Qwest has contracted with Intrado to implement the NENA-recommended process to unlock Qwest records based on validation in NeuStar's number portability database that the

CLEC has activated the number port. Intrado will implement that solution by February 25, 2002. Qwest has also arranged with Intrado for Intrado to unlock CLEC records (upon CLEC authorization to do so) at no charge to CLECs. Thus, Qwest has demonstrated its commitment to provide 911/E911 services in a reliable and nondiscriminatory manner and is already implementing an industry-recommended process to address locked records. Because Qwest is proactively addressing this issue, there is no reason for the Commission to reopen this checklist item.

DISCUSSION

A. Background on E911.

As discussed in the workshops on checklist item 7(I), the E911 database in Qwest's region is managed by Intrado, Inc. (formerly SCC Corp.). E911 service provides carriers with the ability to aggregate, switch, and transport end user emergency calls to a Public Service Answering Point ("PSAP"), which is operated by the government agency legally responsible for public safety in the state. This government agency determines the type of emergency service (i.e., Basic 911 or Enhanced 911), specifications and configurations, trunking arrangements, and funding that will be implemented. End users originate emergency calls that reach the PSAP by dialing the three-digit emergency telephone number, 9-1-1.

Enhanced 911, or E911, service incorporates the Automatic Number Identification ("ANI") feature to forward the end user's telephone number to the PSAP. The E911 service uses the ANI information to retrieve the end user's name and street address from the Automatic Location Identification ("ALI") database and then forwards it to the PSAP.

The E911 database contains information regarding the end user's name, telephone number, address, and the local exchange carrier serving the customer. When a customer changes service providers, the customer's record is not removed from the ALI or E911 database. For reseller CLECs and CLECs that use Qwest's unbundled local switching, the end user's existing

database record will remain unchanged, unless the end user is changing its telephone number, name, or address.

For facilities-based CLECs with their own switching facilities, Intrado has instituted an industry-developed procedure for ensuring that records are not removed from the ALI or E911 database when a customer changes carriers. Instead of removing the customer record when Qwest sends a disconnect (or "migrate") order indicating that an end user has changed service providers, Intrado "unlocks" the record in the ALI database. The "unlocked" record remains unchanged in the database. The new service provider then sends a corresponding connect ("migrate") order to Intrado that "locks" the record and makes the new service provider responsible for the record. *These Intrado procedures ensure that an end user's information will not be removed from the E911 database for any period of time when the end user changes service providers.* In addition, these procedures ensure that future updates to the end user's record can only be generated by the new service provider.

If there are unsuccessful or incomplete migrates as a result of records being locked in the E911 database, the process has been for the new service provider (Qwest or CLEC) to send the information via email to the old service provider to unlock the record. If the order is valid and the port has been activated, the old service provider sends an email to Intrado to unlock the record and process the migrate order update. Specifically, if the "unlock" has not occurred, Intrado currently generates what is called a "755" error. This is a "soft error," meaning that the record is not rejected back to the provider for investigation. Intrado recycles "soft errors" the next day and will continue to do so for 14 days. After 14 days, the error becomes a "760" error – or a "hard error." The hard error tells the service provider that Intrado cannot unlock the record, and the service provider needs to investigate the error and if it has in fact completed the port, contact the previous service provider to unlock the record. As discussed below in Section C, Qwest has contracted with Intrado to revise this process in response to draft industry recommendations. Under the new process, the first time a 755 error is encountered on a

customer record (i.e., a CLEC has requested a change to a 911 record, but the record is locked by the previous carrier), Intrado will validate that the port has been activated (and, thus, service is being provided by the CLEC) and upon validation, immediately unlock the Qwest record to process the migrate order. Only unsuccessful migrates, such as where Intrado finds that the new service provider has not activated the service, will be returned to the new service provider for investigation. In this instance, the new service provider will need to investigate why it has sent a migrate record update for a telephone number that has not been ported. This revised process is discussed further below.

Although changes to customer records are sent in to the database manager (Intrado) on a daily basis, there can be timing differences in the processing of the batch updates of different carriers to the E911 database. This is one reason why PSAPs are trained to ask for name, address and telephone number, even in the E911 environment.

It is important to understand that the industry process for migrate-type orders was designed to ensure that no E911 record is removed from the E911 database if a customer changes carriers. As discussed above, the process developed for "migrate" orders (a customer transferring service from one carrier to another) does not remove the customer's record from the E911 database. Rather, the former carrier "unlocks" the E911 record so that the new carrier can update the record if any information has changed and then "lock" the record with the new carrier's company ID. This process does not affect an end user's ability to dial 9-1-1 and reach the PSAP for assistance.

B. AT&T Has Significantly Overstated The Number Of Records Locked By Qwest.

In the Affidavit of Kenneth Wilson, AT&T alleges that it has experienced 1,700 locked E911 records in the past year. Qwest notes that AT&T did not include any documentation to support these allegations and, therefore, the Commission cannot quantify the number of locked records in 2001. Similarly, it is impossible for the Commission to draw any conclusions on

whether the alleged "locks" are due to Qwest performance failures, or failures of the CLEC, or simply normal business processes.

As discussed above, E911 database updates are processed in batch file updates via file transfer protocol ("FTP"). As a result of batch processing, the sequencing of the batch files of different carriers can lead to a "soft" 755 error. For example, if Qwest sends its daily batch to Intrado at 10:00 p.m., but another facilities-based provider sends its batch file at 9:00 p.m., the new provider's "migrate" order may be processed by Intrado before Intrado receives and processes the Qwest batch update containing the order to "unlock" the record. This is simply a timing difference between providers, but it will result in a "soft" 755 error message from Intrado. Such timing issues are generally resolved within 24 hours. Mr. Wilson provides no information to permit Qwest to determine if any of his alleged errors are due to such timing differences.

In addition, in April-May, 2001, Qwest installed an update of IMA. During this update, there was a system error in IMA that prevented certain records from being "unlocked." Upon discovery of this software error, Qwest fixed the problem in May 2001. It then reprocessed any outstanding AT&T orders. Again, because Mr. Wilson provides no support for his claim of 1,700 locked records in 2001, it is impossible to know what percentage of alleged locked records is attributable to this single error that was quickly identified and fixed.

Similarly, the Commission cannot determine if any of these 1,700 alleged locked records were, in fact, locked to another carrier. As discussed below, although AT&T appears to assume that they are all locked by Qwest, this assumption is not valid. For example, some of the AT&T records that are locked now are locked by other carriers, not Qwest. Thus, some of these alleged 1,700 locked records could have been locked to other carriers.

In investigating similar allegations in other states, Qwest has determined the following regarding AT&T's claims: (1) AT&T is significantly overstating the number of locked records; (2) AT&T has attributed locks to Qwest when another CLEC is responsible for the locked

record; and (3) many locked orders are the result of AT&T failing to complete the number port. Arizona is no different.

Mr. Wilson claims that AT&T has "hundreds" of telephone numbers that it has ported and for which Qwest has failed to "unlock" the records. Attached hereto as Confidential Exhibits 1 and 2 are reports Qwest requested from Intrado showing the total locked records in Arizona for AT&T and AT&T's local services arm, TCG.² Confidential Exhibit 1 and 2 show only 37 locked records for these two AT&T entities combined, far fewer than the "hundreds" Mr. Wilson alleges. Exhibit 3 is a summary of this data. More important, of the 37 locked records, 24 of them (or roughly 65%) are locked not because Qwest failed to "unlock" the records upon completion of the AT&T port but because the numbers have not been ported. As discussed above, there may be a number of reasons why these numbers have not been ported (e.g., a cancelled order or failure by the CLEC to complete provisioning). However, until the port is completed, Qwest should not unlock the record. Of the remaining 13 records, four of them are locked to other CLECs. In other words, another CLEC, not Qwest, has failed to unlock the record at issue. Thus, there are currently only nine telephone numbers locked to Qwest for AT&T in Arizona.³ As Intrado's data demonstrates, AT&T's claims regarding its unlocked records are simply not accurate. Qwest has notified Intrado to unlock these nine records.

² There were no 911 records for AT&T Broadband or MediaOne in Arizona.

³ AT&T has made similar exaggerated claims in other states that have proven to be wrong. In Colorado, for example, AT&T claimed it had 2,500 locked records. Based upon information Qwest requested from Intrado to investigate AT&T's claims, Qwest discovered that AT&T had only 134 telephone numbers that have not been unlocked. Of the 134, 83 (or 62%) had not been activated or ported by AT&T. (This is slightly more than the number discussed during Colorado technical workshops, as Qwest had inadvertently under-calculated the number of Colorado records that had not been ported). Seven of the records were locked to another CLEC, and 19 of the records were mismatched. In other words, the wrong AT&T company sent in the migrate order. Thus, just as in Arizona, AT&T's claims of "hundreds" of locked records proved unsupportable.

Furthermore, under the revised process discussed below, these records will be immediately unlocked upon validation that a CLEC has completed the port activation.

C. Qwest Is Already In The Process Of Implementing NENA-Recommended Processes For Addressing Record Locks/Unlocks. Accordingly, There Is No Reason To Reopen The Record.

Although AT&T's numbers simply do not bear out its claims, this does not mean that Qwest does not take its responsibilities to provide 911/E911 services very seriously. Because Qwest does recognize the importance of this public safety service, Qwest has not waited to take action. Unlocking of customer records has been an issue discussed in the national industry meetings for both the Local Number Portability Administration - Working Group ("LNPA") and for the National Emergency Number Association ("NENA"). In its most recent meeting on December 6-11, 2001, NENA reached agreement on a draft standard recommendation for handling the unlocking of records by database administrators so that the migrate orders from the new service provider can be processed in a more timely manner. The draft NENA standard is attached hereto as Exhibit 4. The draft NENA standard is currently in the approval process by the NENA membership. It has passed two levels of the approval process, and Qwest anticipates final approval of the standards by the end of the first quarter of 2002. When NENA approves the new standard, it will also be incorporated into the LNPA's documentation for the number portability process flows and industry LNP guidelines.⁴

Even though the NENA standard has not yet been approved and published, nor incorporated into the LNPA's industry guidelines, Qwest began discussions with Intrado in mid-December 2001, following the NENA meeting, and reached agreement January 30, 2002 with Intrado to implement the new process for unlocking the records for the new service provider's migrate orders. A redacted copy of this Letter of Agreement and an implementation timeline provided by Intrado is attached hereto as Confidential Exhibit 5. Under this process, if the new

⁴ The LNPA Working Group's Problem/Issue Identification & Management ("PIM"), PIM-006.
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Supplement the Record on Checklist Item 7 (911) -8-
1273109/67817.150

service provider's database E911 update (i.e., migrate order) is unsuccessful due to a locked record, Intrado will access the Local Number Portability ("LNP") database, NeuStar's Number Portability Administration Center ("NPAC") database, to determine if the new service provider has activated the port. If the CLEC has activated the port subscription in the NPAC, Intrado will then unlock the record and process the migrate order to update the E911 database. Intrado will implement the new process by February 25, 2002. Qwest has authorized Intrado to unlock Qwest's customers' records based on validation of a port activation in the NPAC.

CLECs will also benefit from Qwest's proactive efforts. Intrado has agreed to unlock a CLEC's customer records, *for no additional charge*, if authorized to do so by the CLEC. In addition, Intrado will send notification to all of the service providers' (CLECs and incumbent LECs) 911 database administrator contacts regarding this process. Thus, Qwest has not only anticipated the draft NENA requirements, it has ensured that CLECs are also able to take advantage of this process improvement at no extra cost. Given that some of the AT&T records are locked to other CLECs, and not Qwest, it appears that CLECs can benefit from this process change as well.

Qwest also has developed documentation for the new unlock procedures Intrado is implementing. On February 15, 2002, Qwest provided notification to CLECs of the new unlock and posted documentation on the process in the Qwest wholesale PCAT website. *See Exhibit 6* (PCAT excerpt). In addition, Intrado will be sending notification to all service providers, including incumbent LECs, regarding the enhanced process for migrate orders. Accordingly, Qwest is ahead of the curve in addressing the issue of locked/unlocked records.

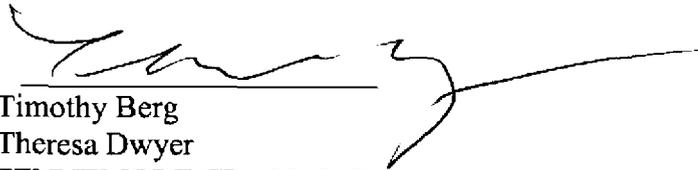
CONCLUSION

There is no need to reopen the record on checklist item 7. As Qwest has demonstrated, AT&T has significantly overstated its claims regarding the number of Qwest locked records and the magnitude of the "problems" it has encountered. Furthermore, Qwest is already in the process of implementing an industry-recommended solution to this issue. That solution will be

in place as of February 25, 2002. Qwest has documented this process change in the PCAT, and it has arranged with Intrado to permit CLECs to take advantage of this process improvement too at no cost. Qwest respectfully requests that Staff and the Commission deny AT&T's motion.

DATED: February 20, 2002

Respectfully submitted,



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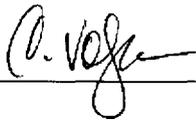
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EXHIBITS

February 20, 2002

Contains Confidential and Proprietary Information

(Redacted Version)

QWEST EXHIBIT 1

CONFIDENTIAL AND PROPRIETARY

(Redacted Version)

QWEST EXHIBIT 2

CONFIDENTIAL AND PROPRIETARY

(Redacted Version)

EXHIBIT 3

Intrado Report as of 2-12-02

	Arizona All AT&T Total	AT&T	AT&T-BB	TCG	MediaOne
Not Ported	24	0	-	24	-
Locked to Another CLEC	4	0	-	4	-
Qwest Locked	9	5	-	4	-
Total Unsuccessful Migrates	37	5	0	32	0

New Acronyms/Terms:

<i>Term</i>	<i>Definition</i>
<i>Failed Migrate Record</i>	A Function of Change (M) migrate service order sent to the E911 database by the Recipient Company which fails to process because the DBMS E911 record is still locked.
<i>LSMS Database</i>	The LSP owned network database which holds down-loaded ported number information. The NPAC SMS (service management system) downloads information to the LSMS; the LSMS supplies porting data to the SCP (service control point) used for the routing of phone calls.
<i>NPAC Database</i>	The eight (8) regional Number Portability Administration Center Databases which contain current Service Provider switching specific information about TNs involved in porting activity.
<i>NPAC - IVR</i>	Porting data is available throughout the U.S. from the NPAC database via IVR access. Throughout this document, referrals to accessing porting data, DOES NOT MEAN IVR ACCESS.
<i>Service Provider Identifier (SPID)</i>	A 4 character numeric service provider identification code assigned by the National Exchange Carrier Association (NECA) to Local Exchange Carriers. It does not include resellers, private switch owners or others not acting as LEC and that are sending customers' transaction record data to the 9-1-1 databases.
<i>Stranded Unlock Record</i>	A record in the E911 database unlocked by the Donor Company via a Function of Change (U) migrate service order for more than seven (7) days for which a migrate order has not sent by the Recipient Company. Once unlocked, a record remains unlocked until a (M)migrate order is received, or that the system's permissive migrate transition time as expired [THERE ARE SYSTEMS OUT THERE THAT AUTOMATICALLY DELETE A STRANDED UNLOCK AFTER XX DAYS, AS THE UNLOCK IS BASICALLY TREATED AS A TRANSIENT DELETE], and no other changes shall be made to the record.
<i>Stand Alone Database</i>	A database system created, maintained and located at a 9-1-1 Jurisdiction.

22. STANDARDS FOR LOCAL NUMBER PORTABILITY

22B. RESOLUTION OF FAILED MIGRATES (See Charts A, B and C)

22B.1 E911 Database Providers will compare "failed migrates" to the NPAC (or LSMS database) at a minimum once each business day. (See Chart A)

- a. If the NPAC Service Provider owner is the Recipient company, the current E911 DBMS record shall be unlocked without donor company participation and the (M) migrate record processed. Both the Donor Company and the Recipient Company are sent notification of the DBMS actions taken.
- b. If the NPAC owner is the Donor company, the (M) migrate record shall be placed in an error status and/or in a waiting file. During the Migrate recycle period, the NPAC database shall be referenced daily to determine if the record has been Activated by the Recipient company. If so, the (M) migrate record shall be unlocked and the (M) migrate record processed. If, at the end of ten (10) days, the NPAC database shows ownership remains with the Donor Company, the (M) migrate record shall be deleted. Only the Recipient Company is sent notification of the actions taken.
- c. If the NPAC database shows the owner is neither the Recipient nor the Donor Company, the (M) migrate record shall be placed in an error status and/or in a waiting file. During the Migrate recycle period, the NPAC database shall be referenced at a minimum once each business day to determine if the record has been Activated by the Recipient company. If so, the (M) migrate record shall be processed. If, at the end of the ten (10) days, the NPAC database shows ownership remains with a Service Provider that is not the Recipient company, the (M) migrate record shall deleted. The

EXHIBIT 4

NENA 02-011
DRAFT Section 22
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Recipient company and the NPAC identified Service Provider are sent notification of this activity. The NPAC identified Service Provider is responsible for assuring the update information is correct for the telephone number in question.

- d. If the E911 DBMS record does not exist, the NPAC database shall be referenced to determine if the record has been Activated by the Recipient company. If so, the (M) migrate record shall be processed as an (I) insert record. If, at the end of the ten (10) days, the NPAC database shows ownership remains with a Service Provider that is not the Recipient company, the (M) migrate record shall be deleted. The Recipient company and the NPAC identified Service Provider are sent notification of this activity. (See Chart B)

The reporting activities by the DBMS Provider detailed above should occur no less than weekly.

IMPORTANT NOTES:

When the NPAC is accessed and a condition of "Record Does Not Exist" is identified for the telephone number being queried, the telephone number is not a ported or pooled number. The Service Provider which owns the NPA/NXX-X is the provider of record.

The above actions shall in no way absolve the Donor Company of their responsibility for following normal procedures for submitting (U) unlock or (D) delete records.

In areas where the Company ID used by the 9-1-1 database systems is other than the SPID used by the NPAC-SMS / LSMS, it is understood that the above recommendations cannot apply.

- 22B.2 If an (I) insert record is received by the E911 DBMS and a record already exists in the DBMS belonging to a different Service Provider, the NPAC database shall be referenced at a minimum once each business day to determine if the record has been Activated by the Recipient company. If so, the (I) insert record shall be processed as a (M) migrate record. If, at the end of the ten (10) days, the NPAC database shows ownership remains with a Service Provider that is not the Recipient company, the (I) insert record shall be deleted. The Recipient company and the NPAC identified Service Provider are sent notification of this activity. (See Chart C)
- 22B.3 Until the DBMS Service Provider has implemented standards 22B.1 and 22B.2 the following standards must be complied with:
 - a. Create a unique informational message code if a migrate (M) function code transaction record is processed and the corresponding embedded database record remains locked.
 - b. Create a unique informational message code if a migrate (M) function code transaction record is attempting to process and the corresponding embedded database record is locked with the recipient LEC Company ID.
 - c. Create a unique error condition code identifying when a migrate (M) function code transaction record reprocessing fails in the attempt to update the 9-1-1 database.
 - d. The DBMS Provider should make an exception report(s) available on a daily basis to the donor LEC if their embedded telephone number records are in an unlocked state.
 - e. The DBMS Provider will reprocess all migrate (M) function code transaction records that did not successfully process because the record is still locked, a minimum of one additional time in one additional business day. Migrate (M) function code transaction records needing to be reprocessed by the DBMS will generate an informational error. If the final migrate (M) function code transaction update attempt fails, the transaction will be treated as an error. Pursuant to local regulations, it is recommended that the Company ID of the locked telephone number record in the DBMS be identified in the error record.
 - f. It is recommended that the DBMS Provider change a record with a migrate (M) function code to an insert (I) function code when there is no existing unlocked (U) telephone number record in the ALI database to be migrated for the telephone number being ported.

EXHIBIT 4

**NENA 02-011
DRAFT Section 22
November 29, 2001**

- g. The donor LEC shall be responsible for identification and referral to the recipient LEC of all records unlocked (U) by their company that have not been migrated within 7 business days. Written notification should be sent to the recipient LEC with potential escalation to the appropriate regulatory authorities.
- h. The recipient LEC shall be responsible for successful resolution of all migrated (M) function code transaction records produced by their company which have not processed due to the unlock (U) function code transaction record not being generated by the donor LEC. Written notification should be sent to the donor LEC with potential escalation to the appropriate regulatory authorities.
- i. The DBMS administrator shall never re-lock a record previously unlocked by a donor LEC. The donor LEC can re-lock its own unlocked records, only if it is determined that the end-user is still a customer of the donor LEC. If the donor LEC relocks the embedded record the migrate (M) function code transaction record should be used.

QWEST EXHIBIT 5

CONFIDENTIAL AND PROPRIETARY

(Redacted Version)

EXHIBIT 6

[TO BE POSTED TO WEBSITE 2-15-02]

ACCESS TO EMERGENCY SERVICES (911/E911)

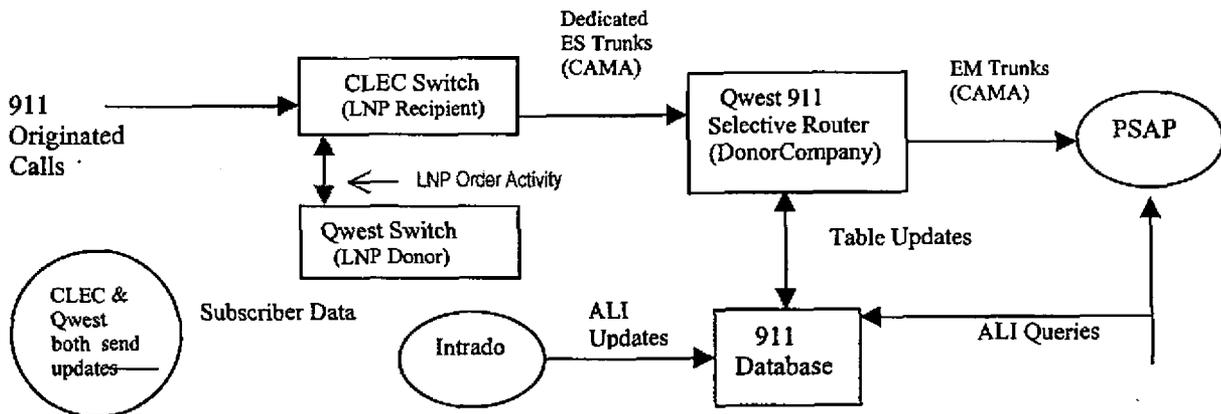
911/E911 WITH LOCAL NUMBER PORTABILITY

Local Number Portability

Local Number Portability (LNP) allows a customer the ability to retain their same telephone number when switching from one local telecommunications carrier to another (see LNP Section of the PCAT for more information on LNP). Where telephone number porting occurs the E911 database record must be updated to reflect the new service provider for the telephone number being ported. With LNP, the Company ID must be passed to the E911 database, along with the Service Provider Company ID and other data elements from the Service Order. The data structure that is to be followed, along with specific function indicators (Unlock, Modify, etc.), are found in the NENA document for LNP at their web site: "http://www.nena9-1-1.org". Process flows regarding 911/E911 impacts on Interim Number Portability (INP), and INP to LNP Conversions are also available under the Ordering section of this document. The CLEC is responsible to ensure the 911 ALI database is updated for number portability activity per industry processes and contractual agreements with Intrado.

Refer to Figure 1. Qwest is the Donor Company (company the telephone number is being ported from), and the CLEC is the Recipient Company (company the telephone number is ported to). All Donor/ Recipient Companies must connect to the 911 network, as required by the state or municipality. Interconnection includes trunking arrangements, default routing, data generation and adherence to the standard LNP National Emergency Number Association (NENA) requirements.

Figure 1
LNP (Recipient/Donor) E911 Configuration



Database Updates

Once the LNP order activity is completed, and a customer moves from a Donor Company to a new Recipient Company, the Donor will disconnect (migrate) the existing 911 record via a service order. Intrado does not remove the customer record but creates an "unlocked record" in the E911 database. The "unlocked record" remains unchanged in the E911 database until the CLEC sends a corresponding migrate order to Intrado. As the owner of the account, the CLEC is then

EXHIBIT 6

responsible for updating the E911 database record and "locking" the customer's record. The following steps should be followed for processing E911 database updates:

- CLEC should send the migrate order to Intrado with the same due date as the associated "Activate" date in the Number Portability Administration Center (NPAC). If a migrate order is sent before the port is complete, an error occurs and an error report is sent to the CLEC.
- If the database update is rejected due to a Qwest record that is locked, Intrado will access the NPAC records to verify the activation of the port. If the CLEC has activated the port subscription in the NPAC, Intrado will then unlock the record and process the migrate order. If the CLEC has not activated the port subscription in the NPAC, Intrado will continue to send the new service provider an error message during the ten-day migrate recycle period until the port subscription is activated in the NPAC. If, at the end of ten business days, the NPAC database continues to show ownership with Qwest, the migrate record shall be deleted and returned to the CLEC.
- If LNP was successfully implemented, and the CLEC continues to experience failed migrate orders that are not resolved with the steps identified above, the CLEC should contact the Qwest E911 Data Maintenance Center at 1-800-357-0911.

This process is available for CLECs acting as the donor switch upon written permission from the CLEC to Intrado unlock their records based on NPAC data. For information on E911 database error codes that can occur when porting telephone numbers, please contact the Intrado Data Integrity Unit (DIU) manager at 303-581-6481 and request the CLEC Informational Packet (CIP).

.INP

Where INP is still in place, it is not technically possible for the CLEC's switch to use the same ANI that the Qwest switch used, even though the customer's dialed telephone number remains the same. Consequently, the end user's ANI will change when served by the CLEC's switch. Therefore, it is essential that the CLEC place the customer's new ANI, with its associated name and street address, in the E911 database when the customer begins to utilize the CLEC's service. Similarly, Qwest must remove the customer's disconnected ANI from the E911 database. The Qwest database ANI record is deleted with the disconnect order and the CLEC creates a new record containing the customer's new ANI (network address number) and the ported telephone number.