



0000109949

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED

WILLIAM A. MUNDELL
COMMISSIONER
JIM IRVIN
COMMISSIONER
MARC SPITZER
COMMISSIONER

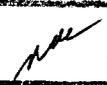
Arizona Corporation Commission

DOCKETED

MAY 10 2002

2002 MAY 10 P 4: 27

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY 

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 VERIFICATION OF COMPLIANCE WITH ITS
CHANGE MANAGEMENT PROCESS**

Qwest Corporation ("Qwest") submits this Verification of Compliance with its Change Management Process, as follows.

I. BACKGROUND

In its Supplemental Report on Qwest's Compliance with Checklist Item 2 -- Access to Unbundled Network Elements (UNEs), Change Management Process and Stand-Alone Test Environment, dated May 7, 2002 ("Staff's Report"), the Arizona Corporation Commission ("Commission") Staff recommended that Qwest submit a verification filing that "more fully demonstrates its compliance with all of the processes and procedures set forth in its [Qwest Wholesale Change Management Process ("CMP")¹] since implementation of the various

¹ Qwest's Wholesale Change Management Process Document ("Wholesale CMP") can be found on the "What is CMP?" page of Qwest's wholesale web site at the following URL: <http://www.qwest.com/wholesale/cmp/whatiscmp.html>

processes and procedures.² Staff further stated that the filing should address any variances. Accordingly, Qwest includes in this filing information regarding the status of test exceptions relating to Qwest's CMP that arose during the Regional Oversight Committee's ("ROC") test of Qwest's OSS, along with responses to the instances of alleged noncompliance raised by the CLECs in their Joint CLEC Brief regarding Qwest's Change Management Process, dated April 9, 2002 ("Joint CLEC CMP Brief").

In addition, Staff recommended that Qwest submit verification that "it has updated its [Product Catalogs ("PCAT")] and Technical Publications [("TechPubs")] so that they are all consistent with the Statement of Generally Available Terms and Conditions ("SGAT")."³ Qwest submits this filing, supported by the Affidavits of Judith M. Schultz, William M. Campbell, and Dennis Pappas, to satisfy Staff's recommendations.

II. THE EVIDENCE DEMONSTRATES THAT QWEST HAS ESTABLISHED A PATTERN OF COMPLIANCE WITH ITS CMP.

Qwest's Wholesale CMP is set forth on the "What is CMP?" page of Qwest's wholesale web site.⁴ Significantly, most of the substantive provisions of the redesigned CMP have been in place for more than five months. The following core provisions have been implemented for more than five months: scope, types of changes, CR processing, introduction/change/retirement of OSS interfaces, prioritization, SATE, and the escalation and dispute processes. The Affidavit of Judith M. Schultz ("Schultz Affidavit"), attached as **Exhibit A**, sets forth substantial, detailed

² Staff's Report at 15.

³ Staff's Report at 15.

⁴ The URL for the "What is CMP?" page on Qwest's wholesale web site is <http://www.qwest.com/wholesale/cmp/whatiscmp.html>

evidence that Qwest is complying with its redesigned CMP. The evidence establishes that Qwest has compiled a strong record of compliance with the redesigned CMP.

Qwest tracks its compliance with various milestones set forth in the process. To date, Qwest has amassed an impressive compliance rate with the CMP:

- In processing CRs, Qwest has met more than 99% of its commitments.
- In introducing a new GUI, Qwest has met 100% of the milestones.
- In changing an application-to-application interface, Qwest has met 100% of the milestones reached thus far.
- In changing a graphical user interface ("GUI"), Qwest has met 100% of the milestones.
- In processing escalations, Qwest has met 98% percent of its commitments.

The information in this section is derived from Attachment 1 to the Schultz Affidavit, which is a matrix showing when each section of the redesigned CMP was implemented and describing Qwest's record of compliance. For each section of the redesigned CMP, the matrix sets forth the following columns of information:

- Process,
- Date Process was Baselined by the Redesign Team,
- Date Process was Implemented,
- Qwest's Record of Compliance, and
- Supporting References

More detail regarding Qwest's implementation and compliance with the redesigned process is set forth below.

Section 1--Introduction and Scope.⁵ Qwest implemented the expanded scope more than six months ago. Between October 3, 2001 and March 26, 2002, Qwest has processed 154 new OSS interface CRs and 43 new product and process CRs. Qwest has rejected only a single process CR because it did not properly fall within the scope of the redesigned CMP. The CR requested a change to the method by which one of Qwest's performance indicator definitions ("PIDs") is measured. The redesign team subsequently agreed that changes to relating to PIDs and how they are measured are not within the scope of CMP.

Section 2 -- Managing the Change Management Process.⁶ The redesigned provisions have been in place for more than seven months. In fact, many of the requirements specified in this section have been in place for much longer. For example, CMP Managers have been in place since the inception of CMP in 1999. Qwest has modified the processes as agreements were reached by the redesign team. For example, CR Project Managers have been in place and fulfilling the roles and responsibilities described in this section since August 2001. Escalation/Dispute Resolution Managers have been in place and fulfilling the roles and responsibilities described in this section since September 2001.

Section 3 -- Meetings.⁷ The redesigned provisions have been in place for more than six months. In fact, many of the requirements specified in this section have been in place for much longer. For example, Qwest has conducted at least one CMP monthly meeting per month and provided meeting materials, referred to as distribution packages, since the inception of CMP in 1999. In October 2001, CMP monthly meetings were extended to two full day sessions at the

⁵ Schultz Affidavit, Attachment 1 at 1.

⁶ Schultz Affidavit, Attachment 1 at 2.

⁷ Schultz Affidavit, Attachment 1 at 3.

request of the CLEC participants. An improved distribution package format was introduced in September 2001 for the product/process CMP meetings and in October 2001 for the systems CMP meetings. Qwest has recorded meeting minutes since August 15, 2001 for product/process CMP meetings, and since September 19, 2001 for systems CMP meetings. In addition, Qwest has made a number of improvements to its CMP web site as a result of the redesign effort.

Qwest also has met its obligations to (1) track and document the status of change requests ("CRs"); (2) hold regular CMP meetings; (3) provide meeting materials in advance of the meetings; and (4) record meeting discussion, action items, and issues. This information may be found on Qwest's CMP web site.⁸

Section 4 -- Types of Change.⁹ The redesigned provisions have been in place for more than seven months. Further, CLECs have had the ability to submit CRs since the inception of Qwest's CMP in 1999.¹⁰ Indeed, between January 1, 2000 and September 30, 2002 Qwest processed and closed 68 OSS Interface CRs. The redesigned process provides for Regulatory, Industry Guideline, CLEC Originated, and Qwest Originated CRs. Qwest has processed CRs in all of these categories.

Section 5 -- Change Request Initiation Process.¹¹ Qwest has complied with the redesigned process for over five months. Qwest processed 103 new OSS Interface CRs in

⁸ See, e.g., <http://www.qwest.com/wholesale/cmp/changerequest.html> (linking to status of change requests); <http://www.qwest.com/wholesale/cmp/calendar.html> (linking to CMP calendars, meeting materials, and minutes).

⁹ Schultz Affidavit, Attachment 1 at 4-5.

¹⁰ The redesign team reached impasse regarding an issue relating to the definition of Regulatory CRs. As discussed in Qwest's Brief regarding Change Management, that issue has been resolved. However, the redesign team had reached agreement on the other aspects of the Regulatory Change definition and the impasse resolution did not change the language contained in the definition.

¹¹ Schultz Affidavit, Attachment 1 at 6.

accordance with the redesigned process between November 1, 2001 and March 26, 2002. Qwest tracks nine milestones for each such CR. For the time period specified, Qwest is responsible for missing only four out of a possible 599 milestones. This equates to an average compliance rate of more than 99%.

Of these four missed milestones for system CRs, three are attributable to instances where Qwest timely sent responses to CLECs, but did not post the response on its web site until the following day. Thus, in these three instances, although the CLECs received Qwest's response on time, Qwest missed the web-posting milestone by a single day.¹² The last of these four missed milestones occurred because Qwest and the CLECs agreed that, where the functionality the CLEC requested was not feasible, Qwest would conduct an ongoing analysis of issues identified by the CLEC rather than issuing a final response to the CR. Thus, this milestone was missed because Qwest and the CLECs agreed to continue to investigate the requested change.

During the same period mentioned above, between November 1, 2001 and March 26, 2002, Qwest also processed 36 new product/process CRs in accordance with the redesigned process. Qwest tracks nine milestones for each such CR. For the specified time period specified above, Qwest is responsible for missing only seven out of a possible 231 milestones. This equates to an average compliance rate of 97%.¹³

Six of the seven missed milestones for product/process CRs relate to the timeframe in which the clarification meeting regarding a change request was held.¹⁴ In four of those six instances, the date by which the clarification meetings should have been held conflicted with the

¹² Schultz Affidavit, Attachment 1 at 6-8.

¹³ Schultz Affidavit, Attachment 1 at 9.

¹⁴ Schultz Affidavit, Attachment 1 at 10-11.

monthly CMP meetings, so the clarification meetings were held after the CMP meeting. In the other two instances of missed clarification meeting milestones, the milestone was missed by two days when a manager failed to assign the CR to a backup employee when the employee responsible was ill and another clarification meeting was held three days late. The seventh missed milestone related to a two day delay in contacting a customer that occurred when a manager failed to assign the CR to a backup employee when the employee responsible was ill.¹⁵

Thus, Qwest's overall compliance rate for processing these 830 CRs exceeds 98%.

Section 6 -- OSS Interface Release Calendar.¹⁶ Qwest has complied with the improved OSS Interface Release for over five months. Qwest already provided a calendar that set forth OSS release information. The redesigned process provides additional customer-facing system information on the calendar. The revised OSS Interface Release Calendar was posted on the web in November 2001. Quarterly updates were posted on the web in January 2002 and April 2002.

Section 7 -- Introduction of a New OSS Interface.¹⁷ The redesigned process for the introduction of a new OSS interfaces -- both application-to-application interfaces and GUIs -- has been in place for more than five months. Qwest has not introduced a new application-to-application OSS interface since agreement was reached. However, Qwest introduced a new GUI called FORCAST on March 8, 2002. There are six milestones Qwest tracks with the introduction of a new GUI. Qwest has complied with all six milestones, demonstrating 100% compliance with the end-to-end process for introducing a new GUI.

¹⁵ Schultz Affidavit, Attachment 1 at 11.

¹⁶ Schultz Affidavit, Attachment 1 at 12.

¹⁷ Schultz Affidavit, Attachment 1 at 12-13.

Section 8 -- Change to Existing OSS Interfaces.¹⁸ The redesigned process incorporated many requirements that Qwest had already implemented for some time. For example, for more than two years, Qwest has implemented not more than three major IMA releases and three IMA point releases within a calendar year, spaced at least three months apart. Similarly, Qwest has provided versioning -- pursuant to which Qwest supported the previous major IMA release for six months after the subsequent major IMA EDI release has been implemented -- for more than two years.

More specifically, the process for changes to application-to-application interfaces pursuant to Section 8.1 has been in place for more than five months. Qwest introduced changes to an existing OSS application-to-application interface (IMA) on April 4, 2001. Qwest tracks six milestones for such changes. Qwest has complied with 100% of the first four milestones.¹⁹ The remaining two milestones have not yet occurred.²⁰

Similarly, the process for changes to GUIs pursuant to Section 8.2 has been in place for more than five months. Qwest introduced changes to an existing GUI, Customer Electronic Maintenance and Repair ("CEMR"), on April 7, 2001. Qwest tracks four milestones for such changes. Qwest has complied with all of these milestones, demonstrating 100% compliance with the end-to-end process for changing an existing GUI.

¹⁸ Schultz Affidavit, Attachment 1 at 14-17.

¹⁹ Schultz Affidavit, Attachment 1 at 16.

²⁰ Schultz Affidavit, Attachment 1 at 16.

Qwest has implemented a performance indicator, PO-16, to measure the timeliness of release notifications for specified OSS interfaces. Results for PO-16 have been reported for November 2001 through March 2002. Qwest met the benchmark for all but one month.²¹

Section 9 -- Retirement of Existing OSS Interfaces.²² The redesigned process for the retirement of an existing OSS interfaces has been in place for more than five months. However, Qwest has not retired any OSS interfaces since agreement was reached.

Section 10 -- Prioritization.²³ Much of the redesigned prioritization process has been in effect for more than eight months. Beginning in August 2001, CLECs began prioritizing Qwest Originated CRs. In August 2001, and again in October/November 2001, CLECs and Qwest jointly prioritized CLEC-Originated CRs and Qwest-Originated CRs for the IMA 10.0 Release. In February 2002, CLECs and Qwest jointly prioritized CLEC-Originated CRs, Qwest-Originated CRs, and Industry Guideline CRs for the IMA 11.0 Release. At that time, there were only nine outstanding CLEC-initiated IMA CRs. Thus, CLECs have been able to prioritize Industry Guideline CRs, in addition to Qwest Originated and CLEC Originated CRs.

Section 11 -- Application-to-Application Interface Testing.²⁴ SATE has been available to the CLECs since August 2001 and was used by CLECs to migrate their systems to

²¹ See Regional Commercial Performance Results at 66 (PO-16), available at <http://www.qwest.com/wholesale/results/roc.html>. PO-16 measures the timeliness of release notifications based on the intervals set forth in the Wholesale CMP. The redesign team agreed that the intervals for release notifications would apply beginning with the IMA 10.0 release. Thus, Qwest met the benchmark in all but one month even though the intervals only recently took effect with the April 4, 2002 release of the draft technical specifications for IMA Release 10.0.

²² Schultz Affidavit, Attachment 1 at 17.

²³ Schultz Affidavit, Attachment 1 at 18-19.

²⁴ Schultz Affidavit, Attachment 1 at 20.

the IMA 8.0 Release and later releases. Specifically, ten CLECs – five individually and an additional five through a service bureau -- have tested in SATE and are now in production.

Section 12 -- Production Support.²⁵ Qwest has complied with the redesigned process for more than two months. Between February 2, 2002 and April 15, 2002, there were three planned outages. In each instance, Qwest met the specified notification intervals. Further, it has been Qwest's practice for some time to conduct post-deployment meetings, as it did to review the recent IMA 9.01 Release. Between February 1, 2002 and March 31, 2002 Qwest processed no trouble tickets with a severity level of 1, eleven tickets with a severity level of 2, 496 tickets with a severity level of 3, and three tickets with a severity level of 4.

Section 14 -- Escalation Process.²⁶ Qwest has complied with the redesigned escalation process for over five months. Between November 16 and March 26, Qwest processed one OSS Interface escalation and four product/process escalations in accordance with the redesigned process. Qwest tracks eight milestones for each escalation. Qwest is responsible for missing one out of a possible 40 milestones. This equates to an average compliance rate of 98%. The single missed milestone occurred when Qwest posted an escalation on its web site on the day after it was due -- thus, Qwest missed the milestone by a single day.²⁷

Section 15 -- Dispute Resolution.²⁸ The redesigned dispute resolution process has been in place for over five months. However, the process has not been invoked since agreement on the process was reached.

III. QWEST HAS ADEQUATELY ADDRESSED ALL SIGNIFICANT ROC TEST ISSUES.

²⁵ Schultz Affidavit, Attachment 1 at 21.

²⁶ Schultz Affidavit, Attachment 1 at 22.

²⁷ Schultz Affidavit, Attachment 1 at 22.

During the ROC test, the test vendors issued "Exceptions" when they encountered situations that could result in negative findings in their final reports. The ROC established a process for resolution of Exceptions, which provided that Qwest would respond to an Exception and the test vendor considered Qwest's response. CLECs were provided an opportunity to comment, and public calls were held to discuss open Exceptions. In many circumstances, Qwest implemented revised processes or systems modifications to address the issues raised in an Exception. When appropriate, the test vendor evaluated the new process or conducted additional testing. When the test vendor was satisfied that the issues it had raised were resolved, it closed the Exception in a "resolved" status.

Just as they did in establishing the Arizona OSS test, the parties to the ROC OSS Test agreed that Qwest had the option to close any Exception in an "unresolved" status when Qwest determined that further modifications or testing would not be productive.

During the test, the ROC vendors issued a total of 256 Exceptions relating to all areas of testing. Qwest made numerous systems and process changes to resolve the vast majority of Exceptions. Virtually all of the Exceptions are now closed. Qwest elected the closed/unresolved status for only nine Exceptions. Only one of those Exceptions -- Exception 3094 -- relates to the evaluation of Qwest's change management process.²⁹ Exceptions 3094, along with two Exceptions that KPMG initially closed in an inconclusive status -- Exceptions 3110 and 3111 --

²⁸ Schultz Affidavit, Attachment 1 at 23.

²⁹ Exception 3094 is the only closed/unresolved Exception that relates to Test 23, which sets forth the evaluation of Qwest's change management process. While the FCC evaluates the test environment as part of its change management evaluation, the Arizona and ROC tests include the evaluation of Qwest's SATE as part of OSS testing, rather than the CMP evaluations. As a result, the closed/unresolved Exceptions relating to SATE are not addressed here.

are discussed below. These Exceptions do not preclude Qwest from complying with the FCC's evaluation criteria.

A. Exception 3094

This exception relates to the product/process provisions of Qwest's CMP. In this exception, KPMG contended that Qwest did not adhere to its change management process in notifying CLECs about a particular proposed change.³⁰ Exception 3094 was issued before the redesign team reached agreement on the Qwest-initiated product/process language that has been incorporated in the Wholesale CMP. Thus, the proposed change at issue in that Exception was submitted pursuant to a prior interim process for product/process changes.

As an initial matter, it is important to note that the FCC has focused solely on OSS systems -- not product or process -- change management processes in its section 271 orders. Verizon has no formal change management process for product or process issues, yet it has received several 271 approvals. SBC has a forum for process issues, known as the CLEC User Forum, but the FCC has not even mentioned that forum in its discussion of SBC's change management process.

Exception 3094 resulted from uncertainty in connection with the previous interim process for product/process changes that Qwest and CLECs developed during the early redesign sessions. The uncertainty relating to those issues has been resolved by the redesign team's agreement on a detailed process for product/process changes. As described in Qwest's Brief regarding Change Management, the parties reached final agreement on -- and Qwest has implemented -- the process

³⁰ Links to the KPMG Disposition Report for Exception 3094, issued April 4, 2002 ("E3094 Disposition Report"), along with Qwest's Response to KPMG's Disposition Report, KPMG's Fourth Response, and Qwest's Response to KPMG's Fourth Supplemental Recommendation, can be found on the ROC OSS test web site at the following URL: <http://www.nrri.ohio-state.edu/oss/master/exceptions/exceptions.htm>

for Qwest-initiated product/process changes.³¹ However, KPMG was unwilling to close this Exception in a resolved status because it was unable to evaluate the new process in practice. Accordingly, KPMG initially closed Exception 3094 in an unresolved status.

At Qwest's subsequent request, KPMG confirmed that the process for Qwest-initiated product/process changes had been incorporated in the Wholesale CMP. The process that gave rise to this Exception has been eliminated. Because the new product/process procedures apply to all Qwest-initiated changes, there should be no future confusion relating to the appropriate process that applies to a particular change. Moreover, with the implementation of the new process, Qwest's CMP provisions for product/process changes are more complete and comprehensive than those in any other change management process in the country.

KPMG's only remaining issue is its ability to observe the new process in action. Qwest agreed in the redesign sessions that it would implement the new process for changes initiated within Qwest on or after April 1, 2002. Qwest advised the parties that some changes initiated prior to April 1, 2002 would not fall within the new process. No party objected to the fact that the new process would not apply to these changes that were "in the pipeline" before April 1, 2002.

Nonetheless, KPMG stated that it "has been unable to observe the documented process in practice due to a lack of change activity to which the revised Product and Process CMP has been applied." On April 25, 2002, KPMG recommended that the status of Exception 3094 be changed from "closed/unresolved" to "open" pending full implementation, *i.e.*, until all "pipeline" changes to which the new process does not apply have been made.

³¹ The Qwest-Initiated Product/Process Change Process is set forth in Section 5.4 of the Wholesale CMP, which can be found on Qwest's wholesale web site at the following URL: <http://www.qwest.com/wholesale/cmp/whatiscmp.html>

The status of this Exception does not affect the Commission's evaluation of Qwest's CMP for section 271 purposes because the FCC has not required an RBOC to establish a change management process for product/process changes.

B. Exception 3110

In Exception 3110, KPMG expressed concern that Qwest's CMP managers do not employ a centralized mechanism to track and ensure that documentation release intervals are followed for upcoming software releases. In its Disposition Report regarding this Exception, KPMG stated that it had "reviewed Qwest internal process documents and verified that software and product/process documentation teams have procedures to prepare documents and distribute them in accordance with the intervals specified in the *Master Redlined CLEC-Qwest CMP Redesign Framework*."³² Thus, KPMG was satisfied that Qwest had implemented procedures to ensure that it complies with its release notification intervals. However, because KPMG had not observed adherence to the documented process for notification interval management, KPMG recommended that Exception 3110 be closed as inconclusive.

In response to the E3110 Disposition Report, Qwest noted that the notification timelines for IMA Release 10.0 began to run on April 4, 2002. KPMG responded by confirming that Qwest has met the first two major release interval milestones for IMA Release 10.0. KPMG also confirmed that Qwest met seven of eight total notification dates, but believed that Qwest may

³² Links to the KPMG Disposition Report for Exception 3110, issued April 2, 2002 ("E3110 Disposition Report"), along with Qwest Response to Focused O&E Call and KPMG Third Response, can be found on the ROC OSS test web site at the following URL: <http://www.nrri.ohio-state.edu/oss/master/exceptions/exceptions.htm>

have missed the eighth distribution date relating to an IABS change.³³ Regardless, KPMG stated that it was unable to determine if Qwest adheres to the CMP software release notification intervals because of the "relatively few" notifications available for observation. KPMG recommended that the status of Exception 3110 be changed from "closed, inconclusive" to "open" pending verification of adherence to notification intervals.

As noted above, Qwest has an overall 98% compliance rate on its CMP obligations. More to the point, Qwest has adhered to 100% of the OSS interface release documentation interval notification milestones it has reached thus far. Qwest's record of compliance, coupled with its success in adhering to the very notification intervals that are the subject of the Exception, demonstrate that Qwest's tracking and verification procedures are adequate.

C. Exception 3111

Exception 3111 relates to Qwest's process for prioritizing and packaging CRs for major IMA releases. In its Disposition Report, KPMG noted that it had "verif[ied] that Qwest had adequately addressed each of the five issues raised in the Exception through documentation modifications and enhancements to the process."³⁴ KPMG observed the prioritizing and packaging process for IMA Releases 10.0 and 11.0. However, because it observed portions of the processes for each release, KPMG believed that Qwest did not comply with the CMP processes in the following respects: (1) Regulatory Changes were not prioritized for IMA Release 10.0, (2) Qwest did not provide CLECs with total capacity information prior to the

³³ The change for which KPMG believed Qwest may have missed a distribution date did not change the system functions that support or affect the billing capabilities for local services provided by CLECs to their end users. Therefore, the IABS change does not fall within the scope of CMP and the notification timeline does not apply.

prioritization votes on IMA 10.0, and (3) Qwest did not participate in the prioritization process for IMA 10.0. In its responses to this Exception, Qwest addressed all three of these issues.

First, KPMG was able to observe Regulatory CRs in both the IMA 10.0 and 11.0 Releases that were subject to the prioritization process as defined for Regulatory CRs, which included "above the line" treatment -- meaning that Regulatory CRs appeared at the top of the list of CRs to which resources are assigned. In addition, both the IMA 10.0 and 11.0 Releases included ordinary normal CRs that were subjected to the prioritization process as ranked CRs -- meaning that those CRs were ranked below the Regulatory CRs. Thus, KPMG had ample opportunity to review the prioritization process for both types of CRs.

The fact that Qwest and the CLECs were at an impasse over whether changes required to meet performance measures should be treated as Regulatory CRs or as ordinary Qwest- or CLEC-originated CRs during the prioritization process for the IMA 10.0 and 11.0 Release did not affect KPMG's ability to evaluate Qwest's adherence to the prioritization process. The resolution of this issue did not change the prioritization process itself, but simply determined which path ("above the line" or ranked) an individual CR will take through the process. KPMG has already observed both paths. The Colorado Commission has resolved the issue impasse issue, deciding that the OBF language that treats changes required to meet performance measures should not be adopted.³⁵ Qwest agreed that this resolution will apply in all states. The Colorado Commission also ordered that, because development of IMA Release 11.0 is well underway, this

³⁴ A link to the KPMG Disposition Report for Exception 3111, issued April 2, 2002 ("E3111 Disposition Report"), can be found on the ROC OSS test web site at the following URL: <http://www.nrri.ohio-state.edu/oss/master/exceptions/exceptions.htm>

³⁵ Colorado Commission Decision regarding Statement of Generally Available Terms and Conditions, Change Management Process Impasse Issue, and SGAT Compliance with §271, adopted

resolution will not apply to IMA Release 11.0.³⁶ However, for releases after IMA Release 11.0, Qwest will submit changes that are required to meet performance measures as Qwest-originated CRs.³⁷

Second, Qwest provided the CLECs with the total capacity of the IMA 11.0 Release prior to the packaging. Thus, KPMG was able to observe Qwest's adherence to the process in that respect.

Third, Qwest demonstrated that it actually had participated in the prioritization process for IMA 10.0.

Thus, the issues KPMG raised did not prevent KPMG from observing Qwest's adherence to the various aspects of the prioritization and packaging process. However, because KPMG had not observed Qwest's adherence to the complete end-to-end prioritization and packaging process for a single major system release, KPMG recommended that this Exception be closed as inconclusive. KPMG has already observed Qwest's adherence to each phase of the prioritization and packaging processes for major system releases that were agreed to through the CMP redesign process and in place at the time prioritization and packaging occurred. These observations demonstrated Qwest's compliance with the process. No further showing is necessary.

IV. QWEST IS ADHERING TO THE PROCEDURAL SAFEGUARDS CONTAINED IN THE REDESIGNED CMP.

The evidence set forth above establishes that Qwest is adhering to its redesigned CMP. The Joint CLECs have raised only four situations in which they claim Qwest failed to adhere to

March 13, 2002 and mailed April 11, 2002 ("Colorado Impasse Resolution Order"), which is attached as **Exhibit D**, at 22-27.

³⁶ Colorado Impasse Resolution Order at 26.

³⁷ Colorado Impasse Resolution Order at 27

its established processes. Of these, two do not involve any deviation from Qwest's established CMP and one is not supported by the facts. Thus, the Joint CLECs could only point to a single instance where Qwest did not meet its obligations under the CMP. This single instance provides little support for the CLECs' claims because it arose outside of the ordinary CMP processes. This scant showing is consistent with the evidence that, as discussed above, establishes that Qwest's overall compliance rate exceeds 98%.

A. Qwest Adheres to its Notification Provisions.

In an odd twist, the Joint CLECs attack Qwest's compliance record by attempting to recast Qwest's actual compliance with the CMP's production support provisions as a failure to comply with the product/process provisions. Not surprisingly, this attempt falls short.

Exhibit I to the Joint CLEC CMP Brief is an "Event Notification" dated April 4, 2002. The Joint CLECs claim that this notification failed to comply with the Qwest-initiated product/process change process, which Qwest agreed to implement for new product/process changes initiated on or after April 1, 2002, by changing NC/NCI codes without notice, i.e., effective immediately. This claim is misguided because the Event Notification neither changed NC/NCI codes, nor was it effective immediately.

This Event Notification was plainly sent in accordance with the CMP's production support provisions. The Event Notification indicates that it is a closure notification and that the initial notification was sent on March 4, 2002. The March 4, 2002 notification, which is attached to the Schultz Affidavit,³⁸ states:

Qwest has discovered several outdated NC/NCI Code combinations in the IMA NC Code Validation database. Effective April 4, 2002, these code

³⁸ See Schultz Affidavit at ¶ 3 and Attachment 2.

combinations will no longer be considered valid and the code sets as documented in Technical Publication 77384 will be required.

Thus, in the March 4, 2002 Event Notification, Qwest notified the CLECs that it had discovered a problem. This notice did not purport to change any NC/NCI codes, but simply advised that outdated codes that do not appear in the relevant TechPub would no longer be considered valid. Indeed, these codes had been removed from the TechPub more than a year and a half earlier, in June 2000.³⁹ Because this was not a notice that changed the NC/NCI codes, but only identified NC/NCI codes that were invalid, the product/process change provisions the Joint CLECs cite do not apply.

A cursory review of the Joint CLECs' Exhibit I plainly indicates that it is an Event Notification pursuant to Section 12, Production Support, of the Wholesale CMP, which describe such notifications in detail. Indeed, the words "Event Notification" appear in large, bold letters across the top of the notice. The Event Notification also states that it was sent to advise that Qwest had experienced trouble with specified systems, contains a Ticket Number, and identifies the Ticket Severity as 3, all in accordance with Sections 12.4 and 12.5 of the CMP relating to production support trouble tickets and event notifications.

Moreover, the April 4, 2002 Event Notification clearly references the initial notification and indicates that it is a closure of that initial notification. And, contrary to the Joint CLECs' claim that the Event Notification was effective immediately, the April 4, 2002 Event Notification was actually issued 31 days after the initial notification -- thus providing the CLECs the 31 calendar day notification they complained that they did not receive.

³⁹ Schultz Affidavit at ¶ 3.

The April 4, 2002 Event Notification represents Qwest's adherence to the CMP's production support provisions. The Commission should reject the Joint CLECs attempt to recast Qwest's compliance as noncompliance.

B. The Facts Show that Qwest has Provisioned ISDN Loops for CLECs where Integrated Pair Gain is Present.

Qwest developed a checklist that is reviewed when changes are made to Qwest's retail products, processes, center operations, or systems to determine whether any action is necessary to maintain retail and wholesale parity. Qwest discussed the checklist and associated methods and procedures with the CLECs during a redesign meeting and the CLECs agreed the process was adequate. Indeed, the Joint CLECs concede that Qwest has implemented "adequate processes to ensure timely and adequate notification to wholesale customers of retail changes that impact[] [the CLECs] as well as to ensure parity between Qwest's retail and wholesale customers."⁴⁰

In their brief, the Joint CLECs now claim that Qwest has not adhered to the process, claiming that Qwest failed to notify its wholesale customers of a "change in retail product and process" relating to the availability of ISDN loops on which there is integrated pair gain ("IPG").⁴¹ As set forth below, there was no change in Qwest's retail product or process. Qwest has continuously provisioned such loops for CLECs for more than three years.

The Joint CLECs' claim is supported solely by the Affidavit of Sheila Hoffman, a Covad employee. Covad claims that, in March 2000, Qwest informed Covad that Qwest could not provision ISDN loops where there was IPG on the loop. As a result, Covad claims that it

⁴⁰ Joint CLEC CMP Brief at 15.

decided not to place orders for ISDN loops with IPG. Covad claims that it only recently learned that Qwest could provision ISDN loops when IPG is present and had been provisioning such loops for its retail customers. The facts -- and Covad's order history -- tell a very different story.

First, there is no basis for the claim that Qwest could not provision ISDN loops when IPG is present. While Qwest initially experienced difficulties with the provisioning of loops for DSL services, Qwest's Held Order group worked directly with the CLECs, *including Covad*, throughout 2000 to implement alternative solutions. In fact, Qwest met with Covad regarding this issue in February and April 2000.⁴² Covad clearly knew that Qwest could provision ISDN capable loops with IPG.

More importantly, the lynchpin of this claim is Covad's contention that it decided not to place orders for ISDN loops where IPG was present because it believed that Qwest could not provision such a loop. Contrary to this claim, Covad has in fact placed orders for and Qwest has provisioned such loops for Covad. Moreover, Qwest began provisioning ISDN loops for Covad where IPG was present in early 1999 and continues to do so through the present time.⁴³ Contrary to the statements in Ms. Hoffman's affidavit, Covad has ordered and Qwest has provisioned ISDN loops where IPG is present continuously for more than three years.

Thus, Covad's own order history establishes that there was no "change" in Qwest's provisioning ISDN loops where IPG is present. Indeed, the discussions during the workshops established that Qwest employs the same eleven-point process to assign facilities for wholesale

⁴¹ In this context, IPG also refers to integrated digital loop carrier ("IDLC"). See Affidavit of Dennis Pappas ("Pappas Affidavit"), attached as **Exhibit B**, at ¶ 2.

⁴² Pappas Affidavit at ¶ 4.

⁴³ Pappas Affidavit at ¶ 5.

and retail.⁴⁴ Consequently, no notification to CLECs relating to the availability of ISDN loops with IPG was required or appropriate. The Joint CLECs' claim to the contrary has no merit.

Moreover, Qwest has provisioned 15,143 ISDN loops for at least six different CLECs across its region that were in service as of March 2002. Of those 15,143 loops, Qwest has provisioned 2,260 ISDN loops -- or approximately 15% -- with IPG for CLECs, including Covad, that were in service as of March 2002.⁴⁵ More specifically, Qwest has provisioned more than 140 ISDN loops where IPG was present for CLECs in Arizona, including Covad.⁴⁶ In contrast to the 15,143 loops Qwest provisioned for CLECs, Qwest had only 2,302 IDSL retail subscribers across the region.⁴⁷ Thus, Qwest has provisioned for its retail customers only 15% of the total number of IDSL loops it has provisioned for CLECs. These facts plainly establish that Qwest has not violated its obligation to provide nondiscriminatory access to ISDN loops where IPG is and is not present.

C. Qwest is Working with CLECs through the CMP to Address the Issues Relating to its Preferred Local Carrier Freeze.

The Joint CLECs concede that changes in processes will not always occur seamlessly and without impacts to CLECs. Nonetheless, they point to one particular issue in an attempt to discredit Qwest's CMP. Rather than support their claims, however, the Joint CLECs' contentions regarding Qwest's Local Service Freeze ("LEFV") actually establish that Qwest's CMP is working properly to address the CLECs' issues.

⁴⁴ Pappas Affidavit at ¶ 11.

⁴⁵ Pappas Affidavit at ¶ 6.

⁴⁶ Pappas Affidavit at ¶ 6.

⁴⁷ Pappas Affidavit at ¶ 6-7.

Qwest's LEFV removal process has been in place for many months. The process provided that a CLEC can submit a local service request ("LSR") to convert a Qwest retail customer to a CLEC customer the day after the customer removed its LEFV. In late February 2002, AT&T began experiencing problems with the process. Qwest now believes that the problems AT&T experience may have been due in part to customer confusion in requesting to remove a "PIC" freeze, rather than the Local Service Freeze, and to a backlog of orders to add a local freeze that were worked by Qwest's vendor during mid-February.

Regardless of the nature of the problems, however, AT&T's own recitation of the events establishes that Qwest worked with AT&T both in and outside of the CMP forum to address AT&T's issues.⁴⁸ The following brief chronology of events summarizes how AT&T's change request ("CR") regarding the process for removing the LEFV from Qwest residential accounts has been processed through CMP:⁴⁹

- March 8, 2002 -- AT&T submitted a CR regarding the process for removing the LEFV from Qwest residential accounts.
- March 18, 2002 -- Qwest held a clarification call with AT&T to discuss the CR. Section 5.3 of the Wholesale CMP requires this call to be held within eight business days after receiving the CR. In this case, Qwest held the clarification call on the sixth business day after AT&T submitted the CR.
- March 20, 2002:
 - At the March 20, 2002 monthly CMP meeting, AT&T presented the CR as a walk-on item because this CR was not submitted three weeks before that meeting, as required by Section 5.3 of the Wholesale CMP. Otherwise, under the agreed process, the CR would not have been discussed until the April 17, 2002 monthly meeting. At the March 20, 2002, AT&T also requested that this

⁴⁸ See Joint CLEC CMP Brief, at Exhibit E and attachments.

⁴⁹ In addition to the events listed, Qwest has responded to various oral and written inquiries from AT&T regarding the LEFV issue submitted in through the CMP and on a business-to-business basis.

CR be processed under the exception process, which refers to a process by which any request for a deviation from the normal process is requested. The CLEC community agreed that this CR could be processed as an exception to normal procedures. Exception processing does not specify particular timeframes, but allows the parties to determine the appropriate course of action on a case-by-case basis.

-- On March 20, 2002, Qwest established a toll-free number for AT&T and its customers to call to remove the LEFV to address AT&T's concern that multiple calls were required to remove the LEFV. This number is still in effect and can be used by all CLECs and their customers.

- March 22, 2002 -- Qwest established a process that allowed CLECs to include the removal order number on their LSRs to allow those LSRs to be processed on the same day the LEFV was removed, rather than the next day.
- March 26, 2002 -- Qwest held a general clarification call with CLECs regarding AT&T's CR. On this call, AT&T requested that the toll-free number be maintained and that Qwest appoint a point of contact to deal with LEFV removal issues.
- On April 4, 2002, Qwest held a follow-up call with CLECs regarding this issue.

Thus, through the existing CMP procedures, Qwest quickly responded to AT&T's most pressing concerns by establishing a toll-free number for LEFV removal and a process by which the CLEC can include the removal order number on its LSR so the LSR can be processed the same day the LEFV is removed. In addition, Qwest established a point of contact for LEFV escalations. While the parties continue to work through all of AT&T's concerns relating to this issue, the existing CMP procedures were adequate to quickly address AT&T's most immediate concerns.

D. Qwest has Observed the CMP Production Support Process.

The Joint CLECs have identified a single circumstance in which Qwest failed to notify the CLECs of changes made in conjunction with the Arizona third party OSS test. The third party tester in Arizona identified issues relating to the information Qwest sends to CLECs in the

daily usage feed ("DUF"). Under normal circumstances, a CLEC would contact Qwest's help desk and open a trouble ticket to report such issues. However, because the issues arose during the third party test, the tester notified Qwest of the issues through the incident work order process established for purposes of the OSS test. While the closure of the trouble ticket would ordinarily trigger Qwest's issuance of a production support notification, these DUF issues arose during the third party test, outside of the normal CMP process. Accordingly, the production support notification was not triggered.

It is important to note that, despite this isolated occurrence, Qwest has complied with more than 98% compliance rate for its production support obligations. This occurrence is one of the few that fall within the remaining less than 2%.

V. **QWEST'S PRODUCT CATALOGS AND TECHNICAL PUBLICATIONS ARE CONSISTENT WITH COMMISSION IMPASSE ISSUE RESOLUTIONS AND THE SGAT.**

Qwest submits the Pappas Affidavit and the Affidavit of William M. Campbell ("Campbell Affidavit"), attached as **Exhibits B and C**, respectively, demonstrating that Qwest has revised its PCATs and TechPubs to reflect the Commission's resolution of impasse issues arising from workshops. Specifically, as set forth in the Campbell Affidavit, Qwest has tracked the Commission's impasse resolutions and changes made to the SGAT.⁵⁰ Qwest has made the changes to its PCATs necessary to reflect both the resolutions and SGAT changes. Similarly, as set forth in the Pappas Affidavit, Qwest has made changes to its TechPubs to reflect the Commission's impasse resolutions and changes made to the SGAT.⁵¹

⁵⁰ Campbell Affidavit at ¶¶ 2-3.

⁵¹ Pappas Affidavit at ¶ 13.

Specifically, the TechPubs listed by the Joint CLECs in their brief are consistent the SGAT, with only a single exception.⁵² That exception relates to Technical Publication 77391, UNE Switching, issue E. In accordance with the redesigned CMP, Qwest posted Technical Publication 77391 to the TechPub review web site to allow CLECs to review and comment the Qwest proposed changes on December 28, 2001. In response to this posting, AT&T submitted comments suggesting several changes. Qwest agreed to incorporate two changes based on AT&T's comments, in addition to making several other clarifications in this TechPub. Thus, this single exception demonstrates that Qwest's process for managing changes to its TechPubs, and receiving CLEC comments regarding those changes, is functioning properly.

In compliance with its commitments during section 271 workshops, Qwest has also substantially revised or created 231 PCATs and 27 TechPubs.⁵³ Qwest notified CLECs of the opportunity for CLECs to provide comments or feedback regarding all of these PCATs and TechPubs.

VI. CONCLUSION

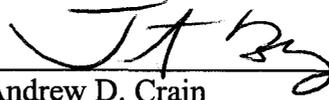
As discussed above, the core provisions of Qwest's CMP have been implemented for more than five months, during which Qwest has compiled an impressive overall compliance rate that exceeds 98%. Thus, the evidence overwhelmingly establishes that Qwest has demonstrated a pattern of compliance with its CMP. Moreover, Qwest has verified that its PCATs and TechPubs are consistent with the Commission's impasse resolutions and Qwest's SGAT.

Respectfully submitted this 10th day of May, 2002.

⁵² Pappas Affidavit at ¶¶ 13-15.

⁵³ Schultz Affidavit, ¶ 4.

RESPECTFULLY SUBMITTED,



Andrew D. Crain
QWEST CORPORATION
1081 California Street
Suite 4900
Denver, CO 80202
(303) 672-2926

Timothy Berg
Theresa Dwyer
FENNEMORE CRAIG
3003 North Central Avenue
Suite 2600
Phoenix, AZ 85012-2913

ATTORNEYS FOR QWEST CORPORATION

**ORIGINAL +10 copies filed this 10th day
Of May, 2002, with:**

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington
Phoenix, AZ

COPY of the foregoing delivered this day to:

Maureen A. Scott
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Ernest Johnson, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

Lyn Farmer, Chief Administrative Law Judge
Jane Rodda, Administrative Law Judge
Hearing Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington
Phoenix, AZ 85007

Caroline Butler
Legal Division
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

COPY of the foregoing mailed this day to:

Eric S. Heath
SPRINT COMMUNICATIONS CO.
100 Spear Street, Suite 930
San Francisco, CA 94105

Thomas Campbell
LEWIS & ROCA
40 N. Central Avenue
Phoenix, AZ 85004

Joan S. Burke
OSBORN MALEDON, P.A.
2929 N. Central Ave., 21st Floor
PO Box 36379
Phoenix, AZ 85067-6379

Thomas F. Dixon
WORLDCOM, INC.
707 N. 17th Street #3900
Denver, CO 80202

Scott S. Wakefield
RUCO
2828 N. Central Ave., Ste. 1200
Phoenix, AZ 85004

Michael M. Grant
Todd C. Wiley
GALLAGHER & KENNEDY
2575 E. Camelback Road
Phoenix, AZ 85016-9225

Michael Patten
ROSHKA, HEYMAN & DEWULF
400 E. Van Buren, Ste. 900
Phoenix, AZ 85004-3906

Bradley S. Carroll
COX COMMUNICATIONS
20402 North 29th Avenue
Phoenix, AZ 85027-3148

Daniel Waggoner
DAVIS, WRIGHT & TREMAINE
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101

Traci Grundon
DAVIS, WRIGHT & TREMAINE
1300 S.W. Fifth Avenue
Portland, OR 97201

Richard S. Wolters
Maria Arias-Chapleau
AT&T Law Department
1875 Lawrence Street, #1575
Denver, CO 80202

Gregory Hoffman
AT&T
795 Folsom Street, Room 2159
San Francisco, CA 94107-1243

David Kaufman
E.SPIRE COMMUNICATIONS, INC.
343 W. Manhattan Street
Santa Fe, NM 87501

Diane Bacon, Legislative Director
COMMUNICATIONS WORKERS OF AMERICA
5818 N. 7th St., Ste. 206
Phoenix, AZ 85014-5811

Philip A. Doherty
545 S. Prospect Street, Ste. 22
Burlington, VT

W. Hagood Bellinger
5312 Trowbridge Drive
Dunwoody, GA 30338

Joyce Hundley
U.S. DEPARTMENT OF JUSTICE
Antitrust Division
1401 H Street N.W. #8000
Washington, DC 20530

Andrew O. Isar
TELECOMMUNICATIONS RESELLERS ASSOC.
4312 92nd Avenue, NW
Gig Harbor, WA 98335

Raymond S. Heyman
ROSHKA, HEYMAN & DEWULF
400 N. Van Buren, Ste. 800
Phoenix, AZ 85004-3906

Thomas L. Mumaw
SNELL & WILMER
One Arizona Center
Phoenix, AZ 85004-0001

Charles Kallenbach
AMERICAN COMMUNICATIONS SVCS, INC.
131 National Business Parkway
Annapolis Junction, MD 20701

Gena Doyscher
GLOBAL CROSSING SERVICES, INC.
1221 Nicollet Mall
Minneapolis, MN 55403-2420

Andrea Harris, Senior Manager
ALLEGIANCE TELECOM INC OF ARIZONA
2101 Webster, Ste. 1580
Oakland, CA 94612

Gary L. Lane, Esq.
6902 East 1st Street, Suite 201
Scottsdale, AZ 85251

Kevin Chapman
SBC TELECOM, INC.
300 Convent Street, Room 13-Q-40
San Antonio, TX 78205

M. Andrew Andrade
TESS COMMUNICATIONS, INC.
5261 S. Quebec Street, Ste. 150
Greenwood Village, CO 80111

Richard Sampson
Z-TEL COMMUNICATIONS, INC.
601 S. Harbour Island, Ste. 220
Tampa, FL 33602

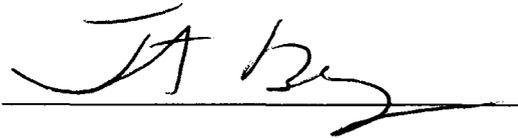
Megan Doberneck
COVAD COMMUNICATIONS COMPANY
7901 owry Boulevard
Denver, CO 80230

Richard P. Kolb
Vice President of Regulatory Affairs
ONE POINT COMMUNICATIONS
Two Conway Park
150 Field Drive, Ste. 300
Lake Forest, IL 60045

Janet Napolitano, Attorney General
OFFICE OF THE ATTORNEY GENERAL
1275 West Washington
Phoenix, AZ 85007

Steven J. Duffy
RIDGE & ISAACSON, P.C.
3101 North Central Ave., Ste. 1090
Phoenix, AZ 85012

Teresa Tan
WorldCom, Inc.
201 Spear Street, 9th Floor
San Francisco, CA 94105

A handwritten signature in black ink, appearing to read "J. Tan", is written over a horizontal line.

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
COMMISSIONER
JIM IRVIN
COMMISSIONER
MARC SPITZER
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

AFFIDAVIT OF JUDITH M. SCHULTZ

1. My name is Judith M. Schultz. I am a Director in the Qwest Corporation wholesale service delivery organization. My office is located at 1005 17th Street, Denver, Colorado. I am currently Director -- Change Management and am responsible for directing the change management process redesign effort and managing the implementation of Qwest's Change Management Process ("CMP").

2. Qwest's record of actual compliance with the redesigned CMP is set forth in the matrix entitled Change Management Improvements, which is attached as Attachment 1. My team and I prepared this matrix.

The information contained in the matrix is true and correct to the best of my knowledge and belief.

3. The Event Notification regarding NC/NCI codes attached as Exhibit I to the Joint CLEC Brief is not an example of a Qwest-originated product or process change and, therefore, is not subject to the Qwest-Initiated Product/Process Change Process. The example provided refers

to an Event Notification regarding a production support issue. It simply listed outdated NC/NCI code combinations Qwest had found on the IMA NC Code Validation database. These outdated NC/NCI codes had been removed from Technical Publication 77384 in June 2000. The Event Notification attached to the Joint CLEC Brief is a closure notification. It refers to the initial notification that Qwest sent to CLECs on March 4, 2002. A copy of the March 4, 2002 Event Notification is attached as Attachment 2.

4. Since 2001, Qwest has substantially revised or created 231 product catalogs ("PCATs") and 27 technical publications ("TechPubs"). Qwest notified CLECs of the opportunity for CLECs to comment or provide feedback regarding all of these PCATs and TechPubs.

PHX/1300577.1/67817.150

Change Management Improvements
04-15-02

Process	Date Process was Baseline by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 1 Introduction and Scope</p> <p>Qwest implemented Section 1 as agreed to by the Redesign Team on October 2, 2001.</p>	<p>October 2, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p>	<p>October 3, 2001</p>	<p>Qwest has complied with this process for over 6 months.</p> <p>Qwest processed 154 new OSS Interface CRs between October 3, 2001 and March 26, 2002.</p> <p>Qwest processed 43 New Product Process CRs between October 3, 2001 and March 26, 2002.</p> <p>Qwest rejected only 1 Process CR on the grounds that it was deemed to be out of scope because the CR called for a change to how a specific PID is measured. The redesign team has subsequently agreed that changes to PIDs, how PIDs are measured, and changes to PAPs are out of scope for CMP.</p>	<p>Supporting data can be found at the following URL: http://www.qwest.com/wholesale/cmp/changerequest.html (Select either CLEC Change Request – Product/Process Interactive Reports or CLEC Change Request – Systems Interactive Reports.)</p>

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

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 3 Meetings</p> <p>Qwest implemented Section 3 as agreed to by the Redesign Team on August 8, 2001.</p>	<p>August 8, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p>	<p>See Qwest's Record of Compliance column.</p>	<p>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 2 full day sessions per the request of the CLEC participants.</p> <p>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.</p> <p>Qwest has recorded meeting minutes since August 15, 2001 for Product and Process CMP meetings, and since September 19, 2001 for Systems CMP meetings.</p> <p>Qwest has made a number of improvements to its CMP website as a result of the Redesign effort.</p>	<p>Supporting data can be found at the following URLs:</p> <p>http://www.qwest.com/wholesale/cmp/tmarchive.html (CMP meeting material, including dates of meetings, distribution packages and meeting minutes)</p> <p>http://www.qwest.com/wholesale/cmp/index.html (Qwest's CMP web site)</p>

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 4 Types of Change</p> <p>Qwest implemented Section 4 as agreed to by the Redesign Team on September 20, 2001.</p>	<p>September 20, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p>	<p>September 20, 2001</p>	<p>Qwest has complied with this process for over 7 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 Master Red-line document.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>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.pdf http://www.qwest.com/wholesale/downloads/2002/020215/systemsfebdistpackage.pdf</p>

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 5</p> <p>Sections 5.1 and 5.2 CLEC-Qwest OSS Interface Change Request Initiation Process</p> <p>Qwest implemented Section 5.1 as agreed to by the Redesign Team on September 5, 2001.</p> <p>Qwest implemented the process improvements that were agreed to by the Redesign Team on October 16, 2001.</p> <p>It should be noted that Qwest has proposed language to address process improvements (specific to the treatment of Regulatory and Industry Guideline Changes) that were developed by the Redesign Team. Qwest is prepared to implement these improvements once the Redesign Team accepts the proposed language.</p>	<p>September 5, 2001 (Original)</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p> <p>October 16, 2001 (Revised)</p> <p>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.)</p>	<p>October 1, 2001(Original)</p> <p>October 30, 2001 (Revised)</p>	<p>Qwest has complied with the revised process for over 5 months.</p> <p>Section 5.1 Between November 1, 2001 and March 26, 2002 Qwest processed 103 new OSS Interface CRs in accordance with the CLEC-Qwest OSS Interface Change Request Initiation Process. There are 9 milestones Qwest tracks 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 4 milestones out of a possible 599 milestones. This equates to an average compliance rate of 99% Following is a description of the missed milestones:</p> <p>1.) SCR012802-1 Milestone Missed: Initial Response Posted to Web</p>	<p>Supporting data can be found at: Http://www.qwest.com/wholesale/cmp/changerequest.html (Select CLEC Change Request – Systems Interactive Reports.)</p>

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: See 3 above.

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.

Correction: Qwest originally

reported that it was responsible for missing 5 milestones. It actually missed 4 milestones. The other was missed because the CLEC did not show up for the clarification meeting so the meeting had to be rescheduled.

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 5.3 CLEC Product/Process Change Request Initiation Process</p> <p>Qwest implemented Section 5.3 as agreed to by the Redesign Team on September 5, 2001.</p> <p>Qwest implemented the process improvements that were agreed to by the Redesign Team on October 16, 2001.</p>	<p>September 5, 2001 (Original)</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p> <p>October 16, 2001 (Revised)</p> <p>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.)</p>	<p>October 1, 2001(Original)</p> <p>October 30, 2001 (Revised)</p>	<p>Qwest has complied with the revised process for over 5 months.</p> <p>Between November 1, 2001 and March 26, 2002, Qwest processed 36 new Product/Process CRs in accordance with the CLEC Product/Process Change Request Initiation Process. There are 9 milestones Qwest tracks 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 7 milestones out of a possible 231 milestones. This equates to an average compliance rate of 97%</p> <p>Following is a description of the missed milestones:</p> <p>1.) PC110201-2 Milestone Missed: Customer</p>	<p>Supporting data can be found at: Http://www.qwest.com/wholesale/cmp/changerequest.html (Select CLEC Change Request – Product and Process Interactive Reports.)</p>

			<p>2.) PC110201-2 Milestone Missed: Clarification Meeting Held Explanation: Employee 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.</p> <p>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.</p> <p>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.</p> <p>5.) PC120301-4 Milestone Missed: Clarification Meeting Held</p>	
--	--	--	--	--

			<p>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.</p> <p>6.) PC120301-5 Milestone Missed: Clarification Meeting Held</p> <p>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.</p> <p>7.) PC110201-1 Milestone Missed: Clarification Meeting Held</p> <p>Explanation: The clarification meeting was held 3 days late.</p>	
--	--	--	---	--

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 6 OSS Interface Release Calendar</p> <p>Qwest implemented Section 6 as agreed to by the Redesign Team on November 1, 2001</p>	<p>October 16, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p>	<p>November, 2001</p>	<p>Qwest has complied with the improved OSS Interface Release for over 5 months.</p> <p>The Calendar already provided OSS Release information, but was improved with the inclusion of additional customer facing system information.</p> <p>The revised OSS Interface Release Calendar was posted on the web in November, 2001. Quarterly updates were posted on the web in January, 2002 and in April, 2002.</p>	<p>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</p>
<p>Section 7 Introduction of a New OSS Interface</p> <p>Section 7.1 Introduction of a New Application to Application Interface</p>	<p>November 1, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p>	<p>November, 2001.</p>	<p>Qwest has not introduced a new application to application OSS interface since agreement was reached</p>	

Process	Date Process was Baseline by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 7.2 Introduction of a New GUI Qwest implemented Section 7 as agreed to by the Redesign Team on November 1, 2001</p>	<p>November 1, 2001 Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p>	<p>November, 2001</p>	<p>Qwest introduced a new GUI (FORCAST) on March 8, 2002. There are 6 milestones Qwest tracks with the introduction of a new GUI: 1.) Release Notification; 2.) Release Announcement; 3.) Interface Overview; 4.) CLEC Comments and Qwest Response; 5.) Final Notification; and 6.) Deployment. Qwest demonstrated 100% compliance with these milestones. .</p>	<p>Supporting data can be found at the following URL: http://www.qwest.com/wholesale/notices/cnla/bysubcat/1_1834_38_00.html</p>

Process	Date Process was Baseline by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 8.0 Change to Existing OSS Interfaces</p> <p>Qwest implemented Section 8.0 as agreed to by the Redesign Team on November 1, 2001.</p>	<p>November 1, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.</p>	<p>See Qwest's Record of Compliance column.</p>	<p>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.</p> <p>In 2001, Qwest implemented 2 major and 3 point releases. In 2002, Qwest has implemented 1 major and 1 point release Y.T.D.</p> <p>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.</p> <p>IMA Release 6.0 was implemented December 8, 2000 and IMA Release 5.0 was retired June 8, 2001.</p> <p>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.)</p> <p>IMA Release 8.0 was</p>	

			<p>implemented August 18, 2001 and IMA Release 7.0 was retired March 16, 2002. (Qwest exceeded its commitment to the CLECs.)</p> <p>Qwest agreed 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.)</p>	
--	--	--	--	--

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 8.1 Application to Application Interface</p> <p>Qwest implemented Section 8.1 as agreed to by the Redesign Team on November 1, 2001.</p>	<p>November 1, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.</p>	<p>November, 2001</p>	<p>Qwest introduced Changes to an Existing OSS Interface – Application to Application Interface on April 4, 2002. There are 6 milestones Qwest tracks for changes to an existing application to application interface: 1.) Draft Interface Technical Specifications; 2.) Walk-through of Draft Interface Technical Specifications; 3.) Qwest Response to CLEC Comments; 4.) Final Interface Technical Specifications; 5.) Joint Testing; and 6.) Deployment. Qwest is 100% compliant with the first 4 milestones. The remaining 2 milestones have not yet arrived. Joint Testing runs from May 18 through June 16. Deployment is June 16, 2002.</p>	<p>Supporting data can be found at the following URL: http://www.qwest.com/wholesale/notices/cnla/bysubcat/1.1834.56.00.html</p>

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 8.2 Graphical User Interface</p> <p>Qwest implemented Section 8.2 as agreed to by the Redesign Team on November 1, 2001.</p>	<p>November 1, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.</p>	<p>November, 2001</p>	<p>Qwest introduced changes to an existing OSS Interface – GUI (CEMR) on April 7, 2002. There are 4 milestones Qwest tracks for changes to an existing GUI: 1.) 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.</p>	<p>http://www.qwest.com/wholesale/notices/cnla/bysubcat/1,1834.4 5.00.html (See CEMR Release 1.03.06 notices.0</p>
<p>Section 9 Retirement of Existing OSS Interface</p>	<p>November 1, 2001</p> <p>Meeting minutes that reflect that the Redesign Team discussed this section of the Master Red-line 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 Master Red-line document, which is indicative of acceptance.</p>	<p>November, 2001.</p>	<p>Qwest has not retired an existing application to application OSS interface since agreement was reached</p>	

Process	Date Process was Baseline'd by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 10 Prioritization</p> <p>Qwest implemented Section 10 and subsequent modifications to it as agreed to by the Redesign Team.</p>			<p>Even though the Redesign Team only recently reached conceptual agreement on the few remaining components of the Prioritization Process, the CLECs have been able to prioritize Regulatory CRs, Qwest Originated CRs and Industry Guideline Interface CRs in addition to their own CRs as described below:</p> <p>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.</p> <p>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</p>	<p>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/System_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.</p> <p>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/System_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.</p>

be treated as either CLEC
Originated CRs or Qwest
Originated CRs.

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 11 Application-to-Application Interface Testing</p> <p>Qwest implemented Section 11 as agreed to by the Redesign Team on February 7, 2002.</p>	<p>February 7, 2002</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p>	<p>February, 2002</p>	<p>Although the Redesign Team on recently 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.</p>	

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 12 Production Support</p> <p>Qwest implemented Section 12 as agreed to by the Redesign Team on December 10, 2001.</p>	<p>December 10, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p>	<p>February 2002</p>	<p>Qwest has complied with this process for over 2 months.</p> <p>Between February 2, 2002 and April 15, 2002, there were 3 planned outages. In each instance, Qwest met the notification intervals specified in the CMP.</p> <p>It has been Qwest's practice, even prior to the Redesign effort to conduct post-deployment meetings. The most recent example is the review of the IMA 9.01 Release.</p> <p>Between February 1, 2002 and March 31, 2002 Qwest processed 0 Severity 1s, 11 Severity 2s, 496 Severity 3s, and 3 Severity 4s.</p>	<p>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.)</p> <p>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</p>

Process	Date Process was Baselined by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 14 Escalation Process</p> <p>Qwest implemented Section 14 as agreed to by the Redesign Team on September 20, 2001.</p>	<p>September 20, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line 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.)</p>	<p>November 16, 2001</p>	<p>Qwest has complied with the Escalation Process for over 5 months.</p> <p>Between November 16 and March 26, Qwest processed 1 OSS Interface escalation and 4 Product/Process escalations in accordance with the CMP Escalation Process. Qwest tracks 8 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 40 milestones. This equates to an average compliance rate of 98%.</p> <p>Following is a description of the missed milestone:</p> <p>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</p>	<p>Supporting data can be found at: Http://www.qwest.com/wholesale/cmp/index.html (See Escalations and Disputes</p> <ul style="list-style-type: none"> - Initiation - Ongoing - Archive)

				milestone by 1 day for PC102301-2-E02.	
--	--	--	--	---	--

Process	Date Process was Baseline by the Redesign Team	Date Process was Implemented	Qwest's Record of Compliance	Supporting References
<p>Section 15 Dispute Resolution</p> <p>Qwest implemented Section 15 as agreed to by the Redesign Team on September 20, 2001.</p>	<p>September 20, 2001</p> <p>Meeting minutes that reflect that the Redesign Team reached agreement on this section of the Master Red-line document can be found at the following URL: http://QWEst.com/wholesale/cmp/re/design.html (see CMP Redesign Meeting Sept. 18 & 20 Final Minutes - 10-10-01, Page 5.)</p>	<p>November 16, 2001</p>	<p>This process has been in place for over 5 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.</p>	<p>Supporting data can be found at: http://qwest.com/wholesale/cmp/escdisp.html</p> <p>See Escalations and Disputes</p> <ul style="list-style-type: none"> - Initiation - Ongoing - Archive)



IT Wholesale Systems Help Desk

EVENT NOTIFICATION

To: Qwest Wholesale Customers
From: Qwest CLEC Implementation Team
Date: March 4, 2002
Subject: IMA GUI and EDI Notification – Outdated NC/NCI Code Combinations

Initial Date/Time: 3/4/02
16:30 MST

Update Date/Time:

Closure Date/Time:

This Event Notification is sent to advise you that Qwest had experienced trouble with the below system:

Ticket Number: 5868375 Ticket Severity: 3

Event Onset

Time: 09:30 MTN

AM PM

Date:

Description of Trouble: Qwest has discovered several outdated NC/NCI Code combinations in the IMA NC Code Validation database. Effective April 4, 2002, these code combinations will no longer be considered valid and the code sets as documented in Technical Publication 77384 will be required. The table below shows the outdated NC/NCI Code Combinations and the associated NC/NCI Code combinations from the Technical Publication.

Outdated Code Combinations			Technical Publication Code Combinations		
NC	NCI	SECNCI	NC	NCI	SECNCI
AD--	02QC5.OOS	02IS5	AD--	02QC5.OOS	02IS5.N
LX-N	02QC3.OOS	02IS5	LX-N	02QC3.OOS	02IS5.N
LX-N	02QC5.OOS	02IS5	LX-N	02QC5.OOS	02IS5.N

Business Impact: CLECs unable to submit orders using outdated NC/NCI combinations.

Work Around: Not Required.

System/Application:

- IMA-GUI
- IMA-EDI
- TELIS/EXACT
- E-Commerce Gateway
- CEMR
- Resale Product Database
- MEDIACC

Client Region:

- Eastern
- Central
- Western
- All Regions

Estimated resolution Time: 0600 MTN AM PM Date: April 4, 2002

Event Closure

Resolution: Documentation and system will be updated on 4/4/02.

Time: MTN

AM PM

Date:

This System Event Notification has been closed.

Escalation:

Additional questions may be directed to the Qwest IMA EDI Implementation Lead Project Manager at 303-896-4279.

[PHX/1300583.1/67817.150](#)

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
COMMISSIONER
JIM IRVIN
COMMISSIONER
MARC SPITZER
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

AFFIDAVIT OF DENNIS PAPPAS

1. My name is Dennis Pappas. I am a Director of Technical Regulatory in the Qwest Corporation Local Network Organization. My office is located at 700 W. Mineral Ave., Littleton, Colorado. I am responsible for the development of strategies to implement the unbundling of Qwest's network as required by the Telecommunications Act of 1996. I provide technical support regarding unbundling issues to the Qwest Network and Public Policy departments.

2. In this affidavit, I address CLEC claims regarding Qwest's provisioning of ISDN loops with integrated pair gain ("IPG") or integrated digital loop carrier ("IDLC"). In this context, the terms "IPG" and "IDLC" are interchangeable in describing the condition that presented difficulties for Qwest in provisioning ISDN loops.

3. The provisioning of ISDN where IDLC is present requires the use of an INA di-group solution.

4. In her affidavit, Ms. Sheila Hoffman states that Qwest informed Covad in March of 2000 that ISDN could not be provisioned if IDLC was present. She goes on to state that Covad has not placed any orders for ISDN where IPG was present to void unnecessary work and create false customer expectations. Attachment 1 displays an Action Item list from a February 24, 2000 meeting with Covad. Item 6 on the list clearly indicates that U S WEST, now Qwest, discussed the INA solution with Covad. Additionally, it indicates that Qwest would review the Covad held orders to determine if the INA solution could be used to provision any of the Held Orders. A follow-up meeting was held on April 26, 2000.

5. Qwest began provisioning ISDN loops for CLECs where IPG is present in early 1999. Qwest has continuously provisioned such loops for CLECs through the present time, although this process has not always been easy. Specifically, Qwest has continuously provisioned such loops for Covad since early 1999.

6. Based on Qwest's records of the ISDN loops that were provisioned for CLECs and in service in March 2002, there were 15,143 ISDN or xDSL-I capable loops in service across Qwest's region. Of these loops, 2260 -- or approximately 15% -- were served using the INA solution. These 2260 loops are provisioned to at least six different CLECs, including Covad. More specifically, Qwest has provisioned more than 140 ISDN loops where IPG was present for CLECs in Arizona, including Covad.

7. As of March 2002, there were only 2302 IDSL loops in service for Qwest's retail customers. This total of 2302 IDSL lines includes those with and without the INA technology.

8. To provide the Commission with some background facts, Qwest introduced retail IDSL in April 2000. Qwest retail DSL sales consultants are required to use a loop qualification tool prior to issuing a service order for DSL. If the customer cannot be served by DSL, the

qualification tool will attempt to qualify the customer for IDSL. The retail tool only indicates if the address could possibly be served by IDSL. If the customer is interested in the retail IDSL offering, an order is issued. The same facility assignment process is used for retail and wholesale requests. If the facility is served by IDLC, an INA di-group solution is needed to provision the retail service, the same is true for an ISDN capable loop. The retail sales representatives do not receive information regarding IDSL and IDLC, they are simply told that the facility may qualify for IDSL service.

9. Throughout 2000 and 2001, Qwest worked through the difficulties with the provisioning of loops for DSL services. Qwest's Held Order group worked directly with CLECs, including Covad, to implement alternative solutions recommended by engineering.

10. Discussions during the 271 workshops included the difficulties associated with unbundling a loop that is served using IDLC technology, engineering solutions for unbundling, installation intervals and Qwest's commitment to look for ways to provision these loops. Although much of the discussion related to general IDLC issues, whenever a specific loop type was discussed, it was the analog loop. However, the IDLC unbundling solutions presented during the workshops apply to all loop types.

11. The following is a summary of facts relating to this issue:

- For the provisioning of xDSL loops, the CLECs are not required to perform a pre-order loop qualification. Qwest encourages the CLECs to use the loop qualification tools, however it is not a requirement.
- For unbundled loops, Qwest does not perform a loop qualification process using the loop qualification tools. Instead, using the mechanized loop assignment process, LFACS, Qwest will assign compatible facilities. The same assignment process is used for Qwest retail and wholesale. If compatible facilities are not found, then Qwest will use an 11-step process to "look" for compatible facilities.
- Qwest encountered difficulties with the unbundling of IDLC. To help facilitate the provision process for these orders, Qwest created a specialized team within the

QCCC to coordinate the provisioning process for coordinated installations that involved IDLC.

- In addition to the dedicated team Qwest committed to unbundled IDLC, Qwest discussed an IDLC unbundling decision tree during the section 271 workshops. The Engineering decision tree was presented and revised during the workshop process. To the extent that Qwest created solutions to unbundle IDLC, the solutions apply to all unbundled loop types.
- During the section 271 workshops, the CLECs were informed that they were not required to perform a pre-order loop qualification before ordering a xDSL loop. Qwest encourages the CLECs to use the loop qualification tools, however it is not a requirement, see SGAT section 9.2.4.3.1 indicates that the CLEC "should" use one of the pre-order loop qualification tools. Based on workshop discussions, Qwest indicated that the CLECs are not required to use the tools.

12. During a discussion regarding this issue at the April 4, 2002 change management redesign meeting, Qwest witness Jean Liston committed to add information to the unbundled loop PCAT and the Loop Qualification CLEC job aide. This activity is already complete and is posted on the wholesale web-site.

13. Qwest has tracked the Arizona Corporation Commission's resolutions of impasse issues. Qwest has made all changes to its Technical Publications required by those resolutions. As of May 9, 2002, Qwest's Technical Publications, specifically including those listed below, are consistent with the SGAT, with one exception, which is described below.

Publication Number	Technical Publication Subject
77350	Installation guidelines
77383	Dark Fiber
77384	UNE Loop
77386	Collocation and Interconnection

77389	UNE Transport
77391	UNE Switching
77398	LIS Interconnection
77403	EEL
77405	Sub-Loop
77406	Shared Loop
77408	Packet Switching

14. The only technical publication that is not fully consistent with the SGAT is Technical Publication 77391, UNE Switching, issue E.

15. Qwest posted Technical Publication 77391 to the Change Management Process (CMP) web site to allow CLECs to review and comment the Qwest proposed changes on December 28, 2001. In response to this posting, AT&T submitted comments suggesting several changes. Qwest agreed to incorporate two changes based on AT&T's comments. Issues #2 and #3 provided by AT&T on January 21, 2002 will be incorporated into Issue F of Technical Publication 77391. Those changes relate to the "*DS3 and SONET port interfaces*" and "*reference to Direct Connection method*" to access Unbundled Switch. In addition, Qwest is clarifying language to address AT&T's Issue #4, as well as making several other changes to clarify the language in this Technical Publication.

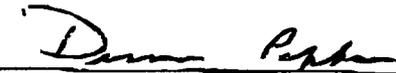
PHX/1300587.1/67817.150

Action Items
COVAD / U S WEST Operations Meeting
February 24, 2000

Item	Action Item	Party Responsible	Status	Comments
1	Send COVAD U S WEST's Loop Assignment Center (LPC) 11-step Held Order Process	USW	Completed (3/2/)	Process document sent to Steve Walden on March 2 nd .
2	Develop a formal trial contract for joint USW/COVAD Vendor Meets (MPO).	USW	Completed (4/6)	Brian Ashby developed a trial contract extending the Phoenix MPO trial to April 30, 2000. Brian Byrd has agreed and is in the process of signing the contracts. USW and COVADS are also planning a joint meeting to work on the same issue in the Denver area. This meeting is tentatively scheduled for the week of April 17 th .
3	Share with COVAD, U S WEST's policy on when orders are removed from "Held for Facilities".	USW	Completed (3/3)	U S WEST recommits "Held Orders" after a construction job is completed.
4	Review 25 missed orders "Pending Customer" in Minneapolis, Denver and Portland to identify specific reasons why missed	USW	Completed (3/8)	A list "held orders - pending customer" was forwarded via e-mail to Minda Cutcher, Dave Glenn and Steve Walden.
5	Sample "Local Market" orders in Littleton, Bellevue and Denver Main CO's and identify why orders are held.	USW	Completed (3/10)	USW will have a list of sampled "held orders - local markets" in Littleton, Denver Main and Bellevue. Report forwarded to Steve Walden.
6	Held Orders <ul style="list-style-type: none"> Review all COVAD Held Orders and identify Loop orders that the new "INA" solution will enable the order to be released. Process orders accordingly. Send to U S WEST a list recently cancelled orders to see if the IPG solution will enable the orders to be completed. 	USW COVAD	Completed (3/10) Open	USW will complete review of COVAD "held orders - local markets". Report forwarded to Steve Walden. Dave Glenn will forward a list of the cancelled orders to Ray Burton and Mike Goebel for review.
7	Load Coil and Bridge Tap Removal Billing	COVAD/USW	Open	U S WEST will not bill Co-Providers for the removal of bridge taps or load coils from the date of it's product announcement, 12/8/99, until process improvements are finalized and communicated to Co-Providers. USW is not waiving it's right to bill prior to 12/8/99.
8	Set up next Operations Meeting	USW	Completed (3/8)	Next meeting will be in Denver the afternoon of April 26 th . The meeting will be held from 2:00 PM - 5:00 PM (MST). The location is U S WEST, 1801 California, Executive Conference Room, 23 rd Floor, Denver, Colorado Additional information will be sent later.

Being first duly sworn upon oath, I, Dennis Pappas declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 10th day of May 2002.

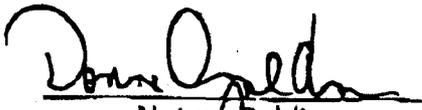


Dennis Pappas

STATE OF COLORADO

COUNTY OF ARAPAHOE

Subscribed and sworn to before me this 1st day of May 2002.



Notary Public

**DONNA GOLDMAN
STATE OF COLORADO
NOTARY PUBLIC**

My Commission Expires:

4/5/04

BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
COMMISSIONER
JIM IRVIN
COMMISSIONER
MARC SPITZER
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

AFFIDAVIT OF WILLIAM M. CAMPBELL

1. My name is William M. Campbell. I am a Director of Interconnection and UNE Services in the Qwest Product Marketing organization. My office is located at 1801 California Street, Denver, Colorado. I am responsible for the ideation, development and life-cycle management of products in support of the Interconnection, Resale and UNE requirements of the Telecommunications Act of 1996. In addition to my product management and marketing responsibilities, I provide technical support regarding unbundling issues to the Qwest Network and Public Policy departments.

2. Qwest has tracked the Arizona Corporation Commission's resolutions of workshop impasse issues. Qwest has made all changes to its Product Catalogs ("PCATs") required by those resolutions.

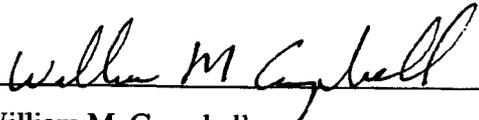
3. Qwest has also tracked the agreed upon changes to the SGAT. Qwest has made all changes to its PCATs necessary to reflect those agreed upon changes to the SGAT, so that the PCATs are consistent with the SGAT.

VERIFICATION OF WILLIAM M. CAMPBELL

William M. Campbell, being duly sworn, hereby state that I am a Director of Interconnection and UNE Services in the Qwest Product Marketing organization. I hereby verify that the factual assertions in my Affidavit are true and correct statements to the best of my knowledge and belief.

FURTHER AFFIANT SAYETH NOT.

Dated this 10th day of May, 2002.



William M. Campbell

STATE OF COLORADO)
) ss
CITY AND COUNTY OF DENVER)

SUBSCRIBED AND SWORN TO before me on this 10th day of May, 2002 by William M. Campbell, who certifies that the foregoing is true and correct to the best of his knowledge and belief.

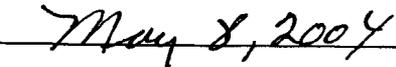


Witness my hand and official seal.



Notary Public

My commission expires:



Decision No. C02-406

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

DOCKET NO. 97I-198T

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

**COMMISSION DECISION REGARDING STATEMENT OF
GENERALLY AVAILABLE TERMS AND CONDITIONS,
CHANGE MANAGEMENT PROCESS IMPASSE ISSUE,
AND SGAT COMPLIANCE WITH § 271**

Mailed Date: April 11, 2002
Adopted Date: March 13, 2002

TABLE OF CONTENTS

I. BY THE COMMISSION	3
A. Background	3
II. Discussion	5
A. SGAT Language.	5
1. SGAT Sections 7.3.4.3 and 7.3.4.4 and SGAT Exhibit Z. .	5
2. SGAT Sections 2.3.1 and 12.0.	5
3. SGAT Sections 9.2.2.8 and 9.2.2.2.1.1.	5
4. SGAT Exhibit C (Maintenance and Repair Intervals For Unbundled Loops).	7
5. SGAT section 9.3.6.4.1 and SGAT Exhibit A.	8
6. SGAT Section 9.3.5.4.1.1.	8
7. MTE Access Protocol.	9
8. SGAT Section 2.2.	10
9. SGAT Section 5.8.2.	10
10. SGAT Section 5.4.6.	10
11. SGAT Sections 11.34.1 to 11.37.	11

12. Access to Inter-Network Calling Name Assistance (ICNAM) Database.	11
13. SGAT Section 8.2.6.3.	11
14. SGAT Section 8.2.1.23.	12
15. SGAT Section 8.4.1.9.	13
16. Section 9.4 (Generally) Regarding Line Sharing.	13
17. SGAT Section 9.2.2.2.1.1.	14
18. SGAT Sections 9.2.2.16 and 9.23.1.7.	14
19. Mechanized Loop Testing (MLT).	14
20. SGAT Sections 9.20.2.1.2 and 9.20.2.1.3.	15
21. SGAT Section 7.3.4.4.	15
22. SGAT Section 7.3.6.2.	15
23. SGAT Sections 10.8.2.6 and 10.8.1.5.	16
24. SGAT Sections 7.1.2.1 and 7.3.2.1.1.	16
25. Review of Technical Publications and The Wholesale Product Catalogue (PCAT).	17
26. Definition of The Loop.	18
27. SGAT Exhibit C (Interval For Provisioning Loops That Require Conditioning).	18
28. SGAT Section 10.2.5.3.1.	19
B. Certification.	20
C. Comments and Arguments Beyond Scope of This Decision. ...	21
D. Future Filings.	21
E. Commission Decision Regarding SGAT Compliance With § 271.22	
F. Change Management Process Impasse Issue	22
G. AT&T Motion	27
III. ORDER	27

I. BY THE COMMISSION

A. Background

1. On November 20, 2001, Qwest Corporation (Qwest) filed its comments demonstrating satisfaction of the requirements of § 271. On December 21, 2001, Qwest filed its Seventh Revised Statement of Generally Available Terms and Conditions (SGAT) in this docket. Qwest thereafter filed supplemental consensus language changes to that SGAT and an errata notice.¹ Qwest asserted that the SGAT, including the supplemental changes, complies with the requirements of § 271 of the federal Telecommunications Act of 1996 (the Act) insofar as those requirements are addressed in the SGAT.²

2. The other participants in this docket were given the opportunity to comment on, and to respond to, Qwest's filing and to request that the Commission review impasse issue

¹ Qwest supplemented the December 21 SGAT on January 7, February 6, February 26, and March 8, 2002. Qwest filed its errata notice on March 13, 2002. The Commission considered the December 21 SGAT as amended and supplemented by the subsequent filings.

² The Regional Oversight Committee (ROC) operations support systems (OSS) test now underway also addresses Qwest's compliance with provisions contained in § 271 of the Act. This Commission will consider the adequacy of the ROC-OSS test, and issue a decision concerning the ROC-OSS test, at a later time.

decisions made by the hearing commissioner.³ Several participants⁴ filed written comments in which they both addressed the SGAT, as filed, and proposed new or additional language to address issues they raised. Qwest replied to the participants' comments.

3. In addition to providing comment and argument concerning the sufficiency of the SGAT, Qwest and the other participants presented arguments concerning an issue that arose in the Change Management Process (CMP) redesign process. This issue reached impasse in the CMP redesign, and the parties seek Commission resolution of the issue.

4. The Commission held a hearing on, and heard argument concerning, the SGAT and the CMP redesign impasse issue on February 26-28 and March 1, 2002. This hearing was transcribed to submit as part of the § 271 record to the Federal Communications Commission (FCC).

³ In this docket the hearing commissioner has issued numerous decisions on SGAT language-related issues that reached impasse. See Decisions No. R01-651-I and No. R01-768-I (first workshop); No. R01-848-I and No. R01-990-I (second workshop) No. R01-1015-I, No. R01-1094-I, and No. R01-1095-I (third workshop); No. R01-846-I and No. R01-990-I (fourth workshop); No. R01-1141-I and No. R01-1253-I fifth workshop); No. R01-1193-I and No. R01-1283-I (sixth workshop); and No. R02-318-I (seventh workshop). In addition, the hearing commissioner issued two decisions addressing Qwest's demonstration of compliance with the hearing commissioner's resolution of impasse issues. See Decisions No. R02-3-I and R02-115-I.

⁴ The Office of Consumer Counsel (OCC) and Covad Communications Company (Covad) filed comments. AT&T Communications of the Mountain States, Inc., TCG Colorado, and WorldCom, Inc. (Joint Commenters) filed joint comments.

5. The participants' positions and arguments are set out in detail in their filings and in the transcript of the hearing. They will not be repeated here.

II. DISCUSSION

A. SGAT Language.

1. SGAT Sections 7.3.4.3 and 7.3.4.4 and SGAT Exhibit Z.

These sections have been amended to include consensus language from the Montana proceeding. The Commission finds the amended language satisfactory. Qwest has not yet provided SGAT Exhibit Z for review. Qwest shall provide this Exhibit at the time it files its final SGAT for Commission consideration. See discussion below.

2. SGAT Sections 2.3.1 and 12.0.

In the February 26, 2002, filing, section 2.3.1 has been deleted. The Commission finds this appropriate. Section 12 contains consensus language that is satisfactory.

3. SGAT Sections 9.2.2.8 and 9.2.2.2.1.1.

a. These sections address competitive local exchange carrier (CLEC) access to Qwest databases and internal records as part of the preordering process. The Joint Commenters request that the Commission reverse the decision of the hearing commissioner, which allowed mediated access, and require direct CLEC access to Qwest's databases. The Joint

Commenters assert that this access is necessary to ensure parity in access to the data and to ensure parity in the accuracy of the underlying data. The Commission affirms the decision of the hearing commissioner.

b. The Federal Communications Commission (FCC) has determined that an incumbent local exchange carrier (ILEC), at a minimum, must provide a requesting CLEC with the same underlying information the ILEC has in its databases or other internal records. In short, in the context of the preordering process, Qwest must provide any underlying information in any of its databases or internal records that can be accessed by any Qwest personnel. The ROC-OSS test has addressed this very issue. The Master Test Plan provides for third-party evaluation of whether, in the context of the preordering process, Qwest furnishes to CLECs the underlying data available to Qwest personnel. CLECs were intimately involved in determining the scope of the Master Test Plan and the criteria or standards to be applied. Qwest satisfactorily completed this third-party test in January, 2002. Thus, whatever data are available to Qwest personnel are also available to a requesting CLEC's personnel.

4. **SGAT Exhibit C (Maintenance and Repair Intervals For Unbundled Loops).**

a. The Joint Commenters request that the Commission reverse the decision of the hearing commissioner, which permits a 24 hour interval, and require an 18-hour interval to restore service. The Joint Commenters assert that this change is necessary to ensure that they will meet their retail service obligations, as contained in the Commission's rules pertaining to retail service. The Commission affirms the decision of the hearing commissioner.

b. The ROC OSS test Performance Indicator Definition (PID) MR-3 (out of service) establishes a 24-hour interval, measured from the time the CLEC reports the trouble to the time the CLEC closes the trouble ticket, within which Qwest must restore service. Commission Rule 4 *Code of Colorado Regulations* (CCR) 723-43-6.2, which governs carrier-to-carrier service, requires Qwest to restore service within 24 hours. On the retail side, Commission Rule 4 CCR 723-23-22.2 requires carriers to clear trouble within 24 hours. The start time for the repair is identical for Qwest and the CLECs. As a practical matter, a CLEC should determine that the problem has been fixed before it closes the trouble ticket with Qwest.

c. According to the Colorado performance results filed with this Commission, Qwest has been meeting the

MR-3 PID measure. In addition, the MR-3 PID is a Tier 1A measurement under the Colorado Performance Assurance Plan (CPAP). Thus, if a problem should develop, Qwest's poor performance will result in the highest level of payments to CLECs.

5. SGAT section 9.3.6.4.1 and SGAT Exhibit A.

a. This concerns Qwest's nonrecurring rate for conducting an inventory of CLEC facilities within a Multiple Tenant Environment (MTE). The Commission finds that no change is required. It appears that Qwest is performing a service that is required when a CLEC seeks access to a MTE. Specifically, it appears that Qwest must inventory CLEC facilities to determine availability and adequacy. Qwest should be able to charge for the service it performs when it inventories CLEC facilities at a specific location.

b. The October 29, 2001, version of SGAT Exhibit A shows a nonrecurring rate of \$287.96 and indicates that this rate will be trued-up in Phase II of Docket No. 99A-577T, the wholesale pricing docket. In that proceeding, CLECs can address whether the nonrecurring rate contained in SGAT Exhibit A is appropriate and can seek a true-up.

6. SGAT Section 9.3.5.4.1.1.

a. There is an inconsistency between SGAT section 9.3.5.4.1 and SGAT section 9.3.5.4.1.1, both of which

speak to the interval between CLEC submission of a MTE Ownership Request and CLEC access to a MTE. SGAT section 9.3.5.4.1.1 provides for a 20 day interval, and SGAT section 9.3.5.4.1 provides for a 10 day interval.

b. The Commission finds that SGAT section 9.3.5.4.1.1 should be changed to state that Qwest has 10 days within which to respond to a CLEC MTE Ownership Request and that, if Qwest fails to respond within that 10 day period, CLEC can access the on-premise wiring. This change makes the two SGAT sections consistent, clarifies Qwest's obligations, and eliminates what could be an opportunity for anti-competitive activity by Qwest.

7. MTE Access Protocol.

a. There are two issues concerning the MTE Access Protocol: first, was the hearing commissioner correct not to adopt a 1969 engineering standard that permitted wires to be capped off and left dangling in a MTE; and, second, is the language on page 7 of the MTE Access Protocol acceptable.

b. With respect to the first issue, the Commission affirms the hearing commissioner decision that the 1969 engineering standard does not provide sufficient protection of Qwest's network and personnel. The Commission agrees with the hearing commissioner that Qwest can take appropriate actions to protect its network.

c. Turning to the second issue, the Commission first notes that this section appears to be misnamed to the extent it lists activities Qwest may undertake when it receives a local service request (LSR). Second, Commission finds that the "CLEC Responsibilities" section does not clearly state that a CLEC can have access to an MTE immediately upon the CLEC's submission of an appropriate LSR. To clarify that a CLEC can have immediate access and that Qwest has a right to perform the three functions listed in the "CLEC Responsibilities" section, Qwest must add the following sentence after the three bullet points: "The Qwest activities outlined above do not have to take place before the CLEC obtains access to a Qwest owned terminal."

8. SGAT Section 2.2.

The consensus language contained in the March 8, 2002, filing is satisfactory. The Commission will not adopt the language change suggested by AT&T because it is contrary to Decision No. R01-1283.

9. SGAT Section 5.8.2.

The consensus language contained in the March 8, 2002, filing is satisfactory.

10. SGAT Section 5.4.6.

The consensus language contained in the March 8, 2002, filing is satisfactory.

11. SGAT Sections 11.34.1 to 11.37.

The March 8, 2002, filing deleted a duplicative page. The filing is satisfactory.

12. Access to Inter-Network Calling Name Assistance (ICNAM) Database.

In his decision on the impasse issues arising from the first workshop, the hearing commissioner determined that Qwest could provide CLEC access to the ICNAM database on a "per dip" basis. See Decisions No. R01-651-I and No. R01-768-I. WorldCom asks this Commission to reverse that decision and to allow CLECs to have bulk access to the ICNAM database. As the hearing commissioner found, the FCC decisions on this topic speak in terms of "per dip" access. In addition, WorldCom has not presented any new information that the Commission finds compelling. Accordingly, the Commission affirms the decision of the hearing commissioner.

13. SGAT Section 8.2.6.3.

a. The Commission finds that this section is satisfactory as written. The hearing commissioner required Qwest to amend SGAT sections 8.1.1.8, 8.2.7, and 8.4.6 to remove the word "physically", and also to amend any other SGAT section that restricted, or implied restrictions on, remote collocation to physical arrangements only. See Decision No. R01-848-I.

b. SGAT section 8.2.6.3 contains a reference to "physical", which the Commission finds appropriate. This section concerns adjacent collocation. If the word "physical" were removed, Qwest would be required to offer virtual collocation in adjacent structures. This would impose on Qwest an obligation to build facilities (*i.e.*, adjacent structures) for CLECs. Both the FCC and the hearing commissioner have found that there is no requirement to build unbundled network elements (UNEs) for CLECs. In the absence of a build requirement imposed by the FCC, this Commission declines to impose such a requirement on Qwest.

14. SGAT Section 8.2.1.23.

a. This section addresses when Qwest can charge for regeneration. As now worded, this section does not clearly state that Qwest must consider applicable American National Standards Institute (ANSI) standards for cable distance limitations. The Commission finds that Qwest must amend this section as follows: "... Qwest shall consider all information provided by CLEC in the Application form, including but not limited to, distance limitations of the facilities CLEC intends to use for the connection *and shall consider any applicable ANSI standards for cable distance limitations.*" This addition makes it clear that Qwest must use the ANSI cable distance limitations standard, which is an objective standard set by a third party.

This language will avoid confusion about the standard to be used.

b. The Commission finds that further amendment is not warranted. SGAT section 8.2.1.23 provides that Qwest shall use "the most efficient route and cable racking for the connection between CLEC's equipment in its collected spaces to the collocated equipment of another CLEC located in the same Qwest Premises; or to CLEC's own non-contiguous Collocation space." To the extent a CLEC believes that Qwest has not met this requirement and that ANSI standards have not been applied, or have been applied incorrectly, the CLEC can dispute the bill and, through resolution of that dispute, obtain a review.

15. SGAT Section 8.4.1.9.

The Commission directs Qwest to amend this SGAT section. In Decision No. R01-848-I, the hearing commissioner found that Qwest must accept all collocation applications filed and that the intervals may vary based on the volume of applications received. To make SGAT section 8.4.1.9 consistent with that decision and to eliminate confusion, Qwest must amend the relevant sentence to read: "Qwest shall accept more than five (5) Applications from CLEC per week per state."

16. Section 9.4 (Generally) Regarding Line Sharing.

a. The Commission finds that no changes are necessary. The hearing commissioner determined that Qwest must

offer line sharing wherever it is technically feasible and that the burden is on Qwest to establish that the requested access is not technically feasible. See Decision No. R01-1015-I. This decision is consistent with the FCC's requirements. SGAT section 9.4.1.1 accurately reflects that decision.

b. The Commission notes that the CLECs have an option available to them. They can use the *bona fide* request process to obtain a determination from Qwest about the technical feasibility of line sharing over fiber.

17. SGAT Section 9.2.2.2.1.1.

The language contains the consensus language and is acceptable.

18. SGAT Sections 9.2.2.16 and 9.23.1.7.

The language filed by Qwest on March 13, 2002, is consensus language and is satisfactory.

19. Mechanized Loop Testing (MLT).

In Decision No. R01-1141, the hearing commissioner determined that Qwest need not provide pre-order MLT. Covad requests this Commission to reverse the hearing commissioner and to require pre-order MLT. Covad asserts that MLT is necessary because it provides assurance that the loop delivered has data continuity and can support xDSL services. Covad has presented no new evidence in support of its request. In addition, the FCC has given no indication that pre-order MLT

is required. Finally, Qwest does not provide pre-order MLT for its own retail services. The Commission affirms the decision of the hearing commissioner.

20. SGAT Sections 9.20.2.1.2 and 9.20.2.1.3.

a. In Decision No. R01-1015-I, the hearing commissioner determined that Qwest need not provide unbundled access to its packet switched network. Covad requests that the Commission reverse the hearing commissioner's decision, order a new UNE not required by the FCC, and require Qwest to provide unbundled access to its packet switched network. The Commission affirms the hearing commissioner.

b. Covad has presented no new evidence in support of its request. In addition, as Covad acknowledges, the FCC has not required unbundled access to an ILEC's packet switched network. In this instance, the Commission will not create a UNE. The SGAT sections are satisfactory as written.

21. SGAT Section 7.3.4.4.

On March 11, 2002, AT&T proposed consensus language which Qwest accepted in its March 13, 2002, filing. The proposed language is satisfactory.

22. SGAT Section 7.3.6.2.

On March 11, 2002, AT&T proposed consensus language which Qwest accepted in its March 13, 2002, filing. The proposed language is satisfactory.

23. SGAT Sections 10.8.2.6 and 10.8.1.5.

These SGAT sections address CLEC access to Qwest's right of way (ROW) agreements with third-party private landowners. Of particular interest to CLECs is access to Multiple Tenant Environment ROW agreements which are now in effect and which are not recorded (*i.e.*, not available through public records). The Commission finds that, to effectuate the Act, it is not necessary to interfere in the existing bilateral ROW agreements between Qwest and the third party landowners who are not regulated. CLECs do not need access to Qwest's ROW agreements before they approach the landowners. The Commission further finds that it is not prudent to put these access rights in SGAT provisions. Thus, no change to these SGAT sections is necessary.

24. SGAT Sections 7.1.2.1 and 7.3.2.1.1.

a. In Decision No. R01-848, the hearing commissioner determined that Qwest need not extend its network to accommodate a CLEC's requested point of interconnection (POI). Therefore, Qwest may require the entrance facility method of interconnection to connect Qwest's serving wire center with the CLEC's switch or POI. One result of this decision is that Qwest may charge CLECs for the loop and transport between Qwest's serving wire center and the CLEC's switch or POI. AT&T asks the Commission to reverse this decision of the hearing

commissioner. The Commission finds that the present SGAT language is satisfactory.

b. The basic issue is cost causation. If the CLEC determines, as it can, the location of its POI, the CLEC should bear the financial consequences that flow from that siting decision. The hearing commissioner's decision recognized this fact. AT&T presented no new information. No change is required.

25. Review of Technical Publications and The Wholesale Product Catalogue (PCAT).

CLECs asserted that, before the Commission approves the SGAT, there must be a review of the technical publications and the PCAT to be sure that the underlying documentation is consistent with the SGAT. The Commission does not agree. First, there is a SGAT provision which states that the SGAT governs and prevails over all other documentation. Second, to the extent this is a concern, the Change Management Process is addressing it. The Commission is aware that, as documents are changed, they are distributed to the CMP participants and to the § 271 workshop participants. Through this process the documents, among other things, are reviewed for consistency with the SGAT. Thus, the Commission finds that it is not necessary to decide this issue at this time, and that

there is no need for language in the SGAT, because this issue is being addressed in CMP.

26. Definition of The Loop.

CLECs assert that the loop should include the splitter as part of the features and functions of the loop in those instances in which the splitter is already present in Qwest's network. The Commission will not order Qwest to include the splitter in the definition of the loop. First, the splitter is not necessary to provide basic local exchange service; it is necessary only to provide advanced services, such as xDSL. Second, the splitter is not included in the rate for the loop approved by the Commission in Docket No. 99A-577T, the wholesale costing proceeding. There is a separate rate element for the splitter. Third, the FCC is now investigating whether the splitter is or is not part of the loop. Should the FCC determine that the definition of the loop must include the splitter, Qwest can change the SGAT language, and the appropriate rate elements in SGAT Exhibit A, at that time.

27. SGAT Exhibit C (Interval For Provisioning Loops That Require Conditioning).

There is a Performance Indicator Definition for the interval within which Qwest must provision a loop that requires conditioning. See PID OP-3. Under this PID, the interval for provisioning such loops is 15 business days. Covad

asked this Commission to shorten this interval because Qwest consistently provisions these loops in six or fewer days. The Commission will not change the provisioning interval. The provisioning interval contained in the PID was developed in a collaborative process which included CLECs, among others. In addition, shortening the provisioning interval would create a perverse incentive to Qwest: To avoid having the interval "tightened" (*i.e.*, shortened), Qwest would reduce its level of performance whenever it was provisioning a service in less time than permitted under a PID interval.

28. SGAT Section 10.2.5.3.1.

a. This section pertains to local number portability (LNP) and the preconditions for Qwest's disconnection of an end user's service. As written, this section states that "Qwest agrees to try to ensure that the End User's service is not disconnected" until specified events occur. (Emphasis added.) The Commission finds that this language is unsatisfactory. End users are directly and adversely affected when a complete disconnection occurs due to a LNP failure. CLECs are correct when they state that end users whose telephone service is disconnected when they switch carriers are likely to blame the new carrier (*i.e.*, the CLEC) for the disconnection. Thus, it is imperative that the SGAT establish a clear liability rule rather than the best efforts

obligation it now contains. There is simply too great an opportunity for an anti-competitive effect and impact in the absence of a firm liability rule.

b. The Commission finds that SGAT section 10.2.5.3.1 as now worded is unsatisfactory. To make this section satisfactory, Qwest must delete the phrase "to try" from the language quoted above.

B. Certification.

The Joint Commenters requested that the Commission require Qwest to file an affidavit certifying that it has included all consensus language in the SGAT and that it will correct any omission or error immediately upon its discovery. On March 1, 2002, counsel for Qwest, Mr. Charles Steese, stated:

. . . to the extent that we have agreed to consensus language and we have some mistake, would we correct it? Absolutely. To the extent there is consensus language from another state, that is a little more complex because there's times that an individual state - it's rare - has some unique requirement that might force that. To the extent that it's consensus language that we agreed to bring to other states, would we bring it? Absolutely.

The Commission accepts this representation and promise in lieu of the requested affidavit. The Commission expects Qwest to comply with its counsel's statement in all particulars. In addition, the Commission expects Qwest to make all corrections necessary to clarify the SGAT language -- without, of course,

modifying the substance -- and to remove conflicts in SGAT language as they are discovered.

C. Comments and Arguments Beyond Scope of This Decision.

The participants made a number of arguments addressing issues not yet ripe for Commission decision. These include: the state of competition in Colorado's local exchange telecommunications market, the public interest, the Change Management Process in general, the effect of Qwest's entry into the interLATA market on the local exchange and long-distance markets, the Colorado Performance Assurance Plan, the Stand Alone Test Environment, and the ROC-OSS test. The Commission will hold at least one additional hearing, and at least two additional decision meetings, to address these and other issues as they pertain to the Commission's recommendation to the FCC concerning Qwest's entry into the interLATA market. The Commission will issue additional decisions which address these remaining areas.

D. Future Filings.

To this date Qwest has not filed a complete SGAT with this Commission. We have received and reviewed the language of the SGAT itself, but we have not seen all exhibits to the SGAT. In addition, as discussed above, we understand that Qwest will make changes to the SGAT language as review of the SGAT continues. To provide this Commission and interested persons

the opportunity to review the final SGAT, including all exhibits, Qwest must file with this Commission the SGAT as it will be filed with Qwest's § 271 application to the FCC. The Commission will issue a further procedural order in this docket. That order will set the date for Qwest's filing of its complete SGAT, including all exhibits. The SGAT filed in compliance with that Commission order will be final for § 271 review purposes in Colorado; and absent further order of the Commission, Qwest will not be able to make changes to the language or the exhibits after that filing.

E. Commission Decision Regarding SGAT Compliance With § 271.

The Commission preliminarily finds that, if Qwest makes the language changes discussed in this decision, the SGAT will meet the requirements of § 271 of the Act. The Commission will reserve final judgment concerning the SGAT until it reviews the yet-to-be-filed final version, including all exhibits.

F. Change Management Process Impasse Issue

1. In addition to the SGAT language, the parties addressed the only issue that had reached impasse, at the time of the filings, in the Change Management Process redesign process: the definition of Regulatory Change Request to be used in the prioritization process for change requests. The

Commission finds that the definition proposed by Qwest should not be adopted.

2. In the CMP any carrier, including Qwest, which desires a change to an interface, or other change which requires software development, must present a Change Request (CR) through the CMP. After Qwest provides specified information concerning all CRs submitted for consideration, the CMP participants "rank" each CR for inclusion in the next software release. This process is necessary because there are limited resources available for the development of each software release. In the event there are insufficient resources to accommodate all CRs in a given release, this ranking process determines which CRs are included and which are not.

3. The CMP redesign process participants have determined that a Regulatory Change Request, a special type of CR, will not be subjected to the ranking process. In view of the importance of the Regulatory Change Request, it will be included automatically in the software release. The CMP participants agreed on this definition of Regulatory Change Request:

A Regulatory Change is Mandated by regulatory or legal entity, such as the 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 a CLEC or Qwest may initiate the change request.

4. Qwest proposed to expand the definition of Regulatory Change Request to include a change to a Performance Indicator Definition included in a Performance Assurance Plan if the change is necessary to improve Qwest's performance under the PID. This would reduce Qwest's potential liability under the PAP. The CLEC CMP redesign process participants objected to this expanded definition. The matter reached impasse, and was brought to the Commission for resolution. The Commission finds that the Qwest proposal should not be adopted. Our decision prevents CLEC-originated CRs from being disadvantaged in the prioritization process and puts CRs submitted by Qwest on an equal footing with CRs submitted by CLECs.

5. First, there is a potential for harm to the CLECs if the Qwest definition is adopted. Qwest could consume an unlimited percentage (up to 100%) of a release by identifying its CRs as Regulatory Change Requests. In that event, implementation of CLEC-originated CRs could get delayed to a later software release even if those CRs, were they implemented, could gain efficiencies for the CLECs and cost them less money than the Qwest-originated Regulatory Change Requests. There is also the potential for confusion because, as we understand it, the persons most knowledgeable about the PIDs are not the participants in the CMP. Yet, the CMP participants would be the

individuals considering the PID-based Regulatory Change Requests, if Qwest's proposed definition were adopted.

6. Second, Qwest has alternative methods available to get its PID-based CRs included in a software release. Qwest can present these CRs for ranking in the normal course of the CMP software development procedure. In that process, it is most likely that CMP CLEC participants will place the PID-related CRs high in the ranking because such CRs are changes that directly affect the CLECs' business. The CLECs participated in the development of the PIDs; and the PIDs were developed precisely because they measure activities deemed most important by the CLECs. In addition, Qwest can request dispute resolution either under the CMP or the CPAP, if the CLECs consistently do not prioritize the PID-related CRs high enough to include them for packaging in a release. Further, if a PID-related CR is of sufficient importance, Qwest can use the Special Change Request Process (SCRIP) to assure that it is included in a release. Under the SCRIP, any carrier, including Qwest, can pay additional monies not already included in the resource allocation for a release to include its CR. This guarantees the CR will be in the release but requires that the carrier "foot the bill" for including the CR.

7. Third and finally, the definition of a Regulatory Change Request is clear that such a change must be mandated by a

regulatory entity or a court. Changes to PAP-related PIDs, which are the focus of Qwest's proposed definition, do not fit this definition. Qwest has repeatedly and consistently maintained that its entering into a PAP is a voluntary undertaking. See Docket No. 01I-041T. The contrary position argued here (*i.e.*, that the PAP mandated) is not availing.

8. Resolution of the impasse issue does not end the inquiry. The Commission understands that software Release 11.0 is due to be released in June, 2002, and contains two PID-related CRs included because they were Regulatory Change Requests under Qwest's proposed definition. These two PID-related CRs are for upgrades to the systems flow-through to meet the requirements of PO-2A and PO-2B, which have dates-certain by which Qwest must increase the amount of flow-through in its ordering systems. See Commission-approved Colorado PAP, Attachment A. CLECs and Qwest have already prioritized (*i.e.*, ranked) the CRs submitted for inclusion in Release 11.0. It appears that CLECs were content, for the most part, to permit these PID-related CRs to be treated as Regulatory Change Requests because, as one would expect, CLECs benefit from increased flow-through capability. Given the timing of the impasse issue reaching the Commission and the fact that development of Release 11.0 is well underway, we see no reason to require Qwest to redo the prioritization for that release.

In the future, however, Qwest must submit PID-related CRs for ranking as Qwest-originated CRs according to the CMP prioritization process.

G. AT&T Motion

On March 8, 2002, AT&T filed a Renewed Motion to Strike Qwest's Exhibit 16 and Its Attorney's Oral Argument Associated Therewith or in the Alternative to Bind Qwest to its Attorney's Representations and Request for Waiver of Response Time, admitted into the record during the Commission's hearing. We deny the motion. The exhibit is merely demonstrative; it is not substantive evidence. We based our decision on the evidentiary record. To the extent there may be inconsistency between the record and the exhibit, the Commission relied on the evidentiary record.

III. ORDER

A. The Commission Orders That:

1. The Commission it will make a favorable recommendation to the Federal Communications Commission concerning the compliance with § 271 of the Act of Qwest's Statement of Generally Available Terms and Conditions provided that Qwest makes the language changes specified in this decision. The Commission will make a final determination concerning the Statement of Generally Available Terms and

Conditions when it has the complete and final SGAT, including all exhibits, before it.

2. The definition of Regulatory Change Request proposed by Qwest for use in the Change Management Process is not adopted and shall not be implemented.

3. Release 11.0 may include the systems upgrades necessary to meet the flow-through requirements of PO-2A and PO-2B.

4. AT&T's Renewed Motion to Strike Qwest's Exhibit 16 and Its Attorney's Oral Argument Associated Therewith or, in the Alternative to Bind Qwest to Its Attorney's Representations and Request for Waiver of Response Time is denied. Response time is waived.

5. This Order is effective immediately upon its Mailed Date.

**B. ADOPTED IN COMMISSIONERS' DECISION MEETING
March 13, 2002**

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

Commissioners

PHX/1300593.1/67817.150