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BEFORE THE ARIZONA CORPORATION COMMISSION

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

DOCKET NO. T-00000A-97-0238

QWEST'S EXCEPTIONS AND COMMENTS ON THE ALJ'S RECOMMENDED OPINION AND ORDER REGARDING CHECKLIST ITEM 4

INTRODUCTION

Qwest Corporation submits these Exceptions and Comments on the Administrative Law Judge's Recommended Opinion and Order regarding Qwest's compliance with Checklist Item 4. Qwest appreciates the time and attention the ALJ has devoted to reviewing the comments and reports submitted by Staff and the parties in this proceeding. For the most part, Qwest takes no exception with the ALJ's recommendations. As set forth below, Qwest challenges only one recommendation: the ALJ's recommendation that Qwest submit to CLEC audits relating to loop qualification data. Given Qwest's agreement to provide a manual loop qualification process that provides CLECs with access to Qwest's back office records, systems, and databases in the event the tools Qwest provides do not return loop make up information or return unclear or incomplete

information, an audit is simply unnecessary. Accordingly, Qwest respectfully requests that the Commission decline to adopt the ALJ's recommendation on this issue.[1]

EXCEPTIONS AND COMMENTS

A. The Commission Should Not Impose The Audit Requirement.

Qwest opposes the ALJ's recommendation that the SGAT include a provision permitting CLECs to audit Qwest's loop qualification tools and processes.[2] Neither the *UNE Remand Order* nor any Section 271 Order imposes an obligation that an incumbent subject itself to numerous, duplicative audits as a condition of meeting its legal obligations. Indeed, the ALJ does not point to any FCC order that requires such audits either as a condition of satisfying the *UNE Remand Order* or as a condition of Section 271 relief. Qwest reiterates that Section 271 proceedings are limited in scope and are not the proper forum to create new obligations.[3] Nor are Section 271 proceedings designed to require BOCs to accede to every demand of CLECs as a condition of 271 approval.[4]

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[1] Qwest notes that in paragraph 119 of the Recommended Opinion and Order, regarding the Colorado xDSL FOC trial, that Staff was unaware whether Qwest had brought the "process improvements" from the xDSL trial forward to Arizona. The overriding purpose of the xDSL FOC trial in Colorado was to determine whether the PO-5 Performance Indicator Definition for xDSL loop types should be changed from 24 to 72 hours. During the 72 hours, Qwest could perform additional investigation to determine whether it could provide the facilities ordered so that Qwest could provide the CLEC with an accurate FOC. As a result of the trial, Qwest and CLECs agreed that the FOC interval should be changed to 72 hours. In October 2001, the Arizona TAG members approved the modification of the PO-5 PID to incorporate the 72-hour FOC for xDSL loop types and DS-1 loops. On February 1, 2002, Qwest notified CLECs through the Change Management Process that the 72-hour FOC would be effective regionwide as of March 4, 2002. The PCAT reflects this modification. This is the principal process improvement from the trial.

[2] Recommended Opinion and Order ¶ 48.

[3] Memorandum Opinion and Order, *Application of SBC Communications, Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In Region, InterLATA Services in Texas*, CC Docket No. 00-65, 15 FCC Rcd 18354, ¶ 22-26 (2000) ("*SBC Texas Order*").

[4] *Id.*

As set forth in previous comments, requiring Qwest to include an audit provision is particularly inappropriate because Qwest has already had its loop qualification systems audited by an independent third party, KPMG Consulting, and KPMG found that Qwest provides CLECs with loop qualification information at parity with itself. KPMG's Second Revised Discrete Test Report 12.7, which confirms after opportunity for CLEC comment that Qwest provides access to loop qualification information at parity, is attached hereto as Attachment 1.[5]

Furthermore, Qwest commits in SGAT Section 9.2.2.8 to provide nondiscriminatory access to loop qualification information:

> These and any future Loop qualification tools Qwest develops will provide CLEC access to Loop qualification information in a nondiscriminatory manner and will provide CLEC the same Loop qualification information available to Qwest.

Accordingly, an audit requirement is not necessary and not a condition of Qwest's compliance with Section 271.

In addition, the SGAT is a document that any Arizona CLEC can elect to execute. Under the ALJ's proposal, Qwest apparently would be subject to a mandatory audit by every CLEC that executes the SGAT or opts into the loop provisions of the SGAT every 18 months. Accordingly, Qwest would be subject to multiple, continuous, and seriatim audits of its loop qualification tools by individual CLECs, auditing the same tools over and over.

An audit is unnecessary in light of the tools and manual process Qwest agrees to provide. Qwest provides access to the detailed loop make up information from its back office systems (the

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[5] Staff in its comments on Qwest's compliance with checklist item 4 and the ALJ in her Recommended Opinion and Order questioned the finality of KPMG's analysis of Qwest's loop qualification process and suggested that CLECs had not yet had an opportunity to comment on KPMG's Revised Discrete Test Report 12.7. Since Qwest submitted the Revised Discrete Test Report 12.7, KPMG has conducted technical conferences and answered questions from AT&T on that report. Attachment 1 is KPMG's Second Revised Discrete Test Report 12.7, dated April 14, 2002, that confirms that Qwest provides access to loop qualification data at parity. This version was included in the ROC Draft Final Report issued on April 19, 2002. Comments are due on the Draft ROC Report on May 1, 2002.

LFACS database) in the Raw Loop Data tool and the new IMA 9.0 Loop Qualification tool.[6] Because the LFACS database has proprietary information and is not easily searchable, the Raw Loop Data tool provides detailed loop make up information in a searchable format. The tool provides the following information: (i) telephone number, (ii) address, (iii) Common Language Location Identification (CLLI), (iv) MLT distance, (v) terminal ID, (vi) cable name, (vii) pair gain type, (viii) pair number, (ix) load type, (x) number of load coils per segment, (xi) bridged tap offset by segment, and (xii) cable gauge and length by segment. It is important to note that disputes arose regarding access to loop qualification information because CLECs, particularly AT&T, complained that the Raw Loop Data tool did not contain information on spare facilities. Qwest responded to that concern and proactively enhanced the Raw Loop Data tool to include information on spare facilities connected through to the switch and partially connected facilities that are not connected back to the switch. This is the only specific loop make up information that CLECs claimed they needed.

At the end of February 2002, Qwest introduced in IMA Release 9.0 a substantially enhanced IMA Loop Qualification tool that incorporates many of the Local Service Ordering Guideline, version 5 ("LSOG 5") industry guidelines. The IMA 9.0 Loop Qualification Tool reveals two levels of data. First, there is a Loop Qualification Tab, which provides the following information:

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[6] Qwest recently discovered a link to a tool in the Facility Check tool that had loop information. This tool was the precursor to the Qwest "Megabit" qualification tool and was not in active use. Although the Qwest Methods & Procedures and training contained no reference to this tool, the access button was mistakenly not disabled. Qwest has disabled the tool, and no Qwest employee has access to it.

Loop Qualification Tab

Field Label	Field Name	Description/Values
LOOPSTAT	Loop Status	A = Facilities Qualified B = Facilities Not Qualified C = Construction Job Required D = Bona Fide Request (BFR) Required E = Conditioning Required F = Not Qualified due to Length
Loop Qual Message	Loop Qualification Message	Message returned to indicate that a product was or was not qualified and why.
LPAC	Loop Product Availability Code	Identifies which products are available for resale based on loop length. QDSL (Qwest DSL) UADSL (Unbundled ADSL) Blank, Not Populated (EDI Only) = Loop Level Data

Behind that tab is a "Loop Data" tab. The table below shows the meaning of the 12 response field descriptors provided on the Loop Data tab in the IMA Loop Qualification tool.

Loop Data Tab

Field Label	Field Name	Description/Values
LST	Local Service Termination	Identifies the CLLI code of the end office switch
PGPRES	Pair Gain/DLC (Digital Loop Carrier) presence	A = Actual B = Estimated Blank, Not Populated (EDI Only)
ELL	Equivalent Loop Length	Returned only if present. The 26- gauge equivalent loop length for the total distance from the end-user to the wire center in kilofeet.
RSUIND	Remote Switching Unit Indicator	If there is a unit, then the value is Y, otherwise, the field is blank

Field Label	Field Name	Description/Values
LLT	Loop Length Type	Identifies the process used to determine the loop length. A = Actual B = Estimated C = Electrical
LL	Loop Length	Loop measurement in kilofeet
LLG	Loop Length Gauge	Identifies the segment loop lengths by gauge
LCQ	Load Coil Quantity	Identifies the quantity of load coils present on the loop
LCT	Load Coil Type	Identifies the type of load coil present on the loop
BTQ	Bridge Tap Quantity	Identifies the quantity of bridge taps on the loop
F1LPCP	F1 Loop Composition	Identifies the composition of the feeder loop facility A = Coaxial B = Copper C = Fiber Y = PG (Qwest specific) Z = UDC (Qwest specific)
F2LPCP	F2 Loop Composition	Identifies the composition of the distribution loop facility(ies) A = Coaxial B = Copper C = Fiber Y = PG (Qwest specific) Z = UDC (Qwest specific)

Thus, in addition to the Raw Loop Data tool, CLECs now have an additional tool that provides loop make up information in a format that is consistent with LSOG 5 guidelines.

Most important, as discussed in full below, Qwest has agreed to implement a manual loop make up request process if the Qwest tools do not return loop make up information or return inconsistent loop make up information. In the event the Qwest loop qualification tools do not return information or return unclear or incomplete information, Qwest will provide the CLEC with loop make up information from its records and back office systems and databases. Given

that Qwest's tools include loop make up information from Qwest's LFACS database, and Qwest will provide additional back office information if the tools do not return loop qualification information, there is simply no basis for an audit to ensure that Qwest provides loop qualification information from its back office systems. In other words, because Qwest commits to provide loop make up information from its "records, back office systems and databases where loop information resides" when its tools do not return complete loop make up information, there is no reason to order an audit to ensure that CLECs have access to this identical information. Because the commitment to provide the back office information CLECs seek is in the SGAT, an audit is simply unnecessary.

The ALJ's proposal goes too far. As proposed, the SGAT would require a periodic audit, as often as every 18 months, regardless of any showing of need. For example, the SGAT language the ALJ recommends does not appear to require the CLEC to make any showing before demanding an audit of Qwest's tools. Thus, a CLEC could request an audit even if it has never placed an order for an unbundled loop, does not provide DSL services, has made no demonstration of need for an audit, or has no need for additional loop qualification information. Even if the Commission were to ignore that no FCC order requires an audit and Section 271 does not require Qwest to submit to such a request, an audit request must be conditioned on a demonstration that the CLEC actually uses the Qwest loop qualification tools, orders DSL services, and must be predicated on a good faith showing that Qwest is not providing or will not provide loop qualification information to CLECs. At a minimum, there must be a demonstration of need before an audit can be requested.

Finally, although Qwest disputes that an audit provision is necessary, if the Commission were to retain this requirement, it should also require the CLEC to retain an independent third party to conduct the audit. Without such a requirement, CLECs have a strong incentive to demand "audits for the sake of audits" and to manufacture "noncompliance" in hopes of creating contractual violations. Indeed, without such a requirement, the individual conducting the audit, a

CLEC employee has every motivation to conduct the audit in a manner that would favor the CLEC. An independent third party has no such incentive and will exercise reasonable restraint in the auditing process. Such a requirement is hardly unprecedented: this Commission has turned to independent third parties to act as intermediaries between Qwest and CLECs in the OSS test to ensure that a balanced approach is taken. A similar requirement should attach to audits of Qwest's loop qualification tools.

Because neither the *UNE Remand Order* nor any Section 271 Order requires an incumbent LEC to submit to audits of its loop qualification tools as a condition of satisfying the Act, and Qwest has committed to provide information from its "records, back office systems and databases" when its tools do not return loop make up information or return unclear or incomplete information, the Commission should decline to adopt the ALJ's recommendation on this point.

As set forth in Qwest's previous comments, Qwest does not contend that CLECs cannot request enhancements to Qwest's loop qualification tools. To the extent a CLEC has a request for Qwest to provide specific additional loop make up information, that request should be addressed in the CMP process where Qwest can provide a single response and all CLECs can benefit from the process. In the alternative, the SGAT should provide that the CLEC could take such requests to the Commission for resolution there. Either alternative is more workable than the recommended audit requirement. For these reasons, the Commission should decline to follow the ALJ's recommendation on this issue.

B. The Commission Should Approve Qwest's Proposed Manual Loop Make Up Process.

In response to Staff's Final Report on Qwest's Compliance with Checklist Item 4, Qwest agreed that it would implement a manual process for CLECs to obtain loop make up information in the unlikely event Qwest's Raw Loop Data tool and enhanced IMA 9.0 Loop Qualification tool do not return loop make up information or return inconsistent loop make up information. In

the ALJ's Recommended Opinion and Order, the ALJ recommends that Qwest submit its manual loop qualification language for review.

In proceedings in other states, Qwest has proposed language for Section 9.2.2.8 to incorporate a manual loop qualification process. Although Qwest believes the language it submitted creates the necessary contractual obligation, AT&T in those jurisdictions has recommended modifications to that language to clarify the process Qwest will follow when performing a manual search of loop make up information. Qwest has reviewed those comments, and can agree to most of AT&T's language suggestions. In addition, Qwest has sent its proposed language to AT&T for its review. As of this filing, Qwest has not heard whether AT&T concurs with Qwest's suggestions. Qwest's proposal is set forth below.

> 9.2.2.8 Loop Qualification Tools. Qwest offers five (5) Loop qualification tools: the ADSL Loop Qualification Tool, Raw Loop Data Tool, POTS Conversion to Unbundled Loop Tool, MegaBit Qualification Tool, and ISDN Qualification Tool. These and any future Loop qualification tools Qwest develops will provide CLEC access to Loop qualification information in a nondiscriminatory manner and will provide CLEC the same Loop qualification information available to Qwest. If the Loop make-up information for a particular facility is not contained in the Loop qualification tools, or if the Loop qualification tools return unclear or incomplete information, then CLEC may request that Qwest perform a manual search of the company's records, back office systems and databases where loop information resides. Qwest will provide the CLEC via email the loop information identified during the manual search within forty-eight (48) hours of Qwest's receipt of the CLEC's request for manual search. The email will contain the following loop makeup information: composition of the loop material; location and type of pair gain devices, terminals, bridge tap, and load coils; loop length, and wire gauge. After completion of the investigation, Qwest will load the information into the LFACS database, which will populate the fields in the Loop qualification tools.

In other jurisdictions, AT&T has opposed this language because Qwest did not identify the information that would be returned in the manual process. Qwest has addressed that concern in the language proposed above, and has confirmed that this information will be provided to the CLEC directly via email, as AT&T requested. Qwest has also included AT&T's requested

language stating that the manual loop make up search will include a search of Qwest's "records, back office systems and databases where loop information resides." Qwest has also revised the interval to a standard 48 hours, as requested by AT&T.

There is only one aspect of AT&T's recommended language to which Qwest cannot agree. In other jurisdictions, AT&T has suggested that Qwest should perform a manual loop qualification if the CLEC "questions the accuracy of the information" in the Qwest tools. AT&T's suggestion is overly broad for several reasons. First, as shown in Attachment 1, KPMG has confirmed in its Second Revised Discrete Test Report 12.7 that the database underlying the CLEC and Qwest loop qualification tools, the Loop Qualification Database, is the same and shares the same underlying source (the LFACS database). KPMG further confirmed that the CLEC and Qwest retail tools are updated with the same frequency. Accordingly, Qwest shares in any inaccuracies in the Loop Qualification Database. The FCC has determined that where inaccuracies in loop data affect CLECs and the BOC alike, there is no basis for finding a lack of Section 271 compliance.[7] Furthermore, the most recent reported performance data for the OP-5 performance measure in Arizona shows that for 2-wire non-loaded loops (the unbundled loop type frequently used for xDSL services) and line shared loops, CLECs are experiencing very few troubles within 30 days of installation.

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[7] Memorandum Opinion and Order, *Joint Application by SBC Communications Inc., Southwestern Bell Telephone Company, and Southwestern Bell Communications Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region, InterLATA Services in Kansas and Oklahoma*, CC Docket No. 00-217, FCC 01-29 at ¶ 126 (rel. Jan. 22, 2001) ("*SBC Kansas-Oklahoma Order*") ("As we noted above, when searching for loop qualification information, both competing carriers and SWBT utilize the LFACS system. Thus, any inaccuracies in SWBT's database, because they affect SWBT in the same fashion as competing carriers, are not discriminatory"); Memorandum Opinion and Order, *Application of Verizon New England Inc., Bell Atlantic Communications, Inc. (d/b/a Verizon Long Distance), NYNEX Long Distance Company (d/b/a Verizon Enterprise Solutions) And Verizon Global Networks Inc., For Authorization to Provide In-Region, InterLATA Services in Massachusetts*, CC Docket No. 01-9, FCC 01-130 ¶ 66 (rel. Apr. 16, 2001) ("*Verizon Massachusetts Order*") (same).

Second, as described in the *SBC Kansas/Oklahoma*[8] and *Verizon Massachusetts Orders*,[9] those BOCs perform manual loop qualifications when the tools they offer do not return loop make up information, not simply because the CLEC "questions the accuracy of the information" the tools return. By demanding that Qwest conduct a manual loop qualification every time a CLEC "questions the accuracy of the information" in the loop qualification tools, AT&T is demanding more than other BOCs appear to offer.

Furthermore, Qwest has already agreed to perform a manual look up of loop information if the tools return unclear or incomplete information – that is, if there is a demonstrable issue with the loop make up information returned. By committing to perform a manual look up when the information returned is demonstrably suspect, Qwest has gone far already to meet AT&T's demands.

Finally, such a process is unnecessary. Regardless whether a CLEC uses the loop qualification tools, disagrees with the information returned, or receives information that shows that the loop would not support DSL service, the CLEC can still submit an order and Qwest will use its 11-step assignment process described in previous filings to search for facilities to fill the order. If compatible facilities are available, the CLEC will receive an FOC within 72 hours that will provide a due date. Qwest retail, on the other hand, does not have this option. If the Qwest DSL tool returns a "red" answer, meaning that the facility will not support Qwest DSL service, Qwest processes provide that the retail representatives cannot sell DSL to that customer. Thus, CLECs already have the option of submitting an order, even if they "question the accuracy" of the tools results, and Qwest will attempt to assign facilities to the order.

In short, Qwest has attempted to respond to all of AT&T's issues regarding the language for Section 9.2.2.8. Where it has drawn the line, it has done so reasonably and consistently with

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[8] *See SBC Kansas-Oklahoma Order* ¶ 122.

[9] *See Verizon Massachusetts Order* ¶ 58.

the processes of other BOCs. The Commission should find that Qwest has complied with the ALJ's recommendations on this point and satisfies its obligations under checklist item 4.

CONCLUSION

For the foregoing reasons, the Commission should not impose the audit language the ALJ recommended and should approve Qwest's proposed language for Section 9.2.2.8.

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Respectfully submitted,

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12.7. Test Results: Loop Qualification Process Evaluation (Test 12.7)

1.0 Description

The Loop Qualification Process Evaluation was a review of the Digital Subscriber Line (DSL) loop qualification processes and procedures developed and employed by Qwest to support both retail and wholesale customers. Operational analysis techniques were used to determine if parity exists in the design, implementation, and use of Qwest's loop qualification process. Additionally, the Loop Qualification Evaluation assessed remedial[1] options available for both the retail and wholesale processes.

2.0 Method

This section summarizes the test execution method.

2.1 Business Process Description

This section provides an overview of the Qwest retail and wholesale loop qualification processes.

2.1.1 Qwest Retail Loop Qualification Process

Qwest retail customers are able determine whether or not a loop qualifies for Digital Subscriber Line (DSL) service by using one of the following methods:

- Qwest retail Web site tool (orderdsl.qwest.com)
- Telephone inquiry
- Email or fax inquiry.

The retail Web site tool allows Qwest's end-user customers to submit a query by entering their existing telephone number (TN) to determine whether the loop dedicated to that TN qualifies for DSL service. If the customer receives a positive response, the customer can then request DSL service.

Retail customers can submit requests for DSL service via telephone, email, or fax. In these cases, a Qwest retail customer service representative performs the loop qualification by using the QCity/QServ Loop Qualification Tool.

The QCity/QServ tool allows the Qwest representative to submit a query using either the customer TN or street address. The customer TN is used for most requests. QServ returns a positive or negative response:[2]

[1] Remedial options are those available to a CLEC for instances in which the loop that it is trying to qualify for Digital Subscriber Line (DSL) service does not. Examples include auto qualification capabilities and loop conditioning services for facility-based CLECs.

[2] Prior to December 18, 2001, QServ included an additional "Not Determined" response. The "Not Determined" response indicated that the database did not contain sufficient information for QCity to determine whether or not the customer qualified for service.

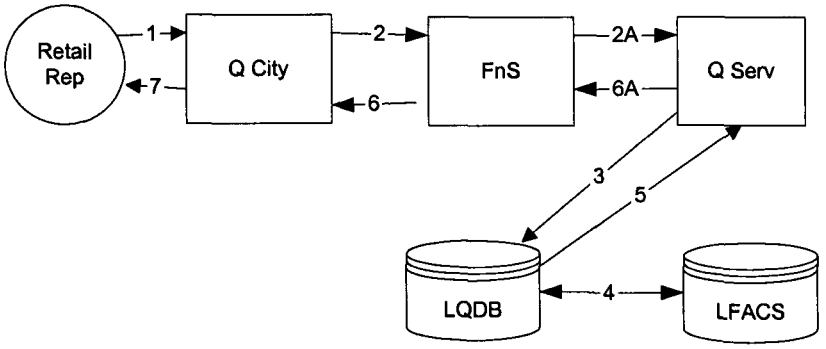
- *YES* – indicates that the customer's loop qualifies for Qwest DSL service at given available data transmission speed(s), and that an order for DSL service can be submitted.
- *NO* – indicates that the customer's loop does not qualify for DSL service. A brief explanation is provided in the query response (e.g., distance from Central Office [CO] is too great).

Qwest retail customers do not have remedial options available to them when the specified loop does not support DSL service. For example, Qwest does not provide conditioning services[3] in order to qualify customers for DSL service if the specified loop does not support DSL service. In such instances, customers are informed that their TNs are not currently eligible for the service.

2.1.2 Qwest Retail Loop Qualification System Description

The diagram below illustrates the systems and flow that comprise Qwest's retail loop qualification query process:

Figure 12.7-1: Qwest Retail Loop Qualification Query Process



1. Representative accesses QCity Loop Qualification by telephone number (TN); Representative enters TN.
2. QCity sends telephone number to QServ.

2A. Data is transferred from QCity to QServ via Fetch 'n Stuff (FnS).

3. QServ pulls Raw Loop Data (RLD) to make loop qualification determination from Loop Qualification Data Base (LQDB).
4. LQDB checks Loop Facilities Assignment & Control System (LFACS) to verify that data is current.
5. LQDB returns RLD for TN(s).
6. QServ uses RLD to determine loop qualification, and sends loop qualification results to QCity.

6A. Data is transferred from QServ to QCity via FnS.

7. QCity sends loop qualification results to representative.

Process Description: The QCity interface submits the query information to QServ. QServ is a middleware application that collects raw loop data from the LQDB, and uses an algorithm to determine whether or not the loop qualifies, based on the technical specifications for Qwest DSL service.

System Performance/Database Updates: The LFACS database is Qwest's central repository for loop data. It serves as the source database for the loop data in the LQDB, which is updated

[3] Conditioning services include removal of bridge taps and/or load coils.

with revised LFACS data on a nightly basis. The two databases are synchronized each month. As part of the loop qualification query process, the LQDB also queries a "recent changes" field in the LFACS database. If this query indicates that the LFACS information has been updated, the new LFACS information is populated into the LQDB, and is used as the basis for the loop qualification query.

2.1.3 Qwest Wholesale Loop Qualification Process

CLECs can determine whether a loop qualifies for DSL service by using one of the following methods:

- Qwest Interconnect Mediated Access (IMA)
- Qwest wholesale Web site tool
- Telephone inquiry to the Interconnect Service Center (ISC)
- Email or fax inquiry to the ISC.

IMA is the primary tool used by CLECs to perform loop qualifications. The other methods serve as backups, in the event that a CLEC experiences difficulty with the IMA tools, described below. Qwest makes several loop qualification tools available through IMA. They include:

- Qwest DSL Qualification Tool – used by resellers to qualify loops, based on the specific technical parameters for Qwest DSL service
- Asymmetrical Digital Subscriber Line (ADSL) Unbundled Loop Qualification Tool – used by facility-based CLECs to qualify loops, based on industry standard technical specifications for ADSL service
- Raw Loop Data Tool – used to access specific loop makeup characteristics, including specific loop modifications, segment characteristics, distance from the CO, and presence of load coils or bridge taps.

CLECs use the appropriate IMA tool to qualify a customer loop prior to submitting an order to Qwest for DSL service. Raw loop data can be used to examine the specific loop makeup characteristics for a discrete TN or address. In addition to using the Raw Loop Data Tool, CLECs can download bulk raw loop data in comma-delimited format, from Qwest's Web site, for use in their own loop qualification applications.

The Qwest DSL and ADSL Unbundled Loop Qualification tools allow CLECs to submit queries by either TN or address. The IMA response for both tools indicates whether or not the specified loop qualifies for DSL service, and provides a brief description of the loop make-up characteristics.

The Qwest DSL tool provides the same response as the QCity tool described above: "yes" or "no." The result is based on the same data and algorithms that are used in the retail loop qualification process (see Section *2.1.4* below for further detail).

Resellers of Qwest DSL service who receive a "no" response can request an auto qualification feature through IMA. This tool allows CLECs to establish an automatic query that periodically

checks a loop to determine if its qualification status has changed. If a loop becomes eligible at a later date, the CLEC is notified via email. As is the case with the retail process, Qwest does not provide resellers of Qwest DSL service conditioning services in order to qualify customers for DSL service.

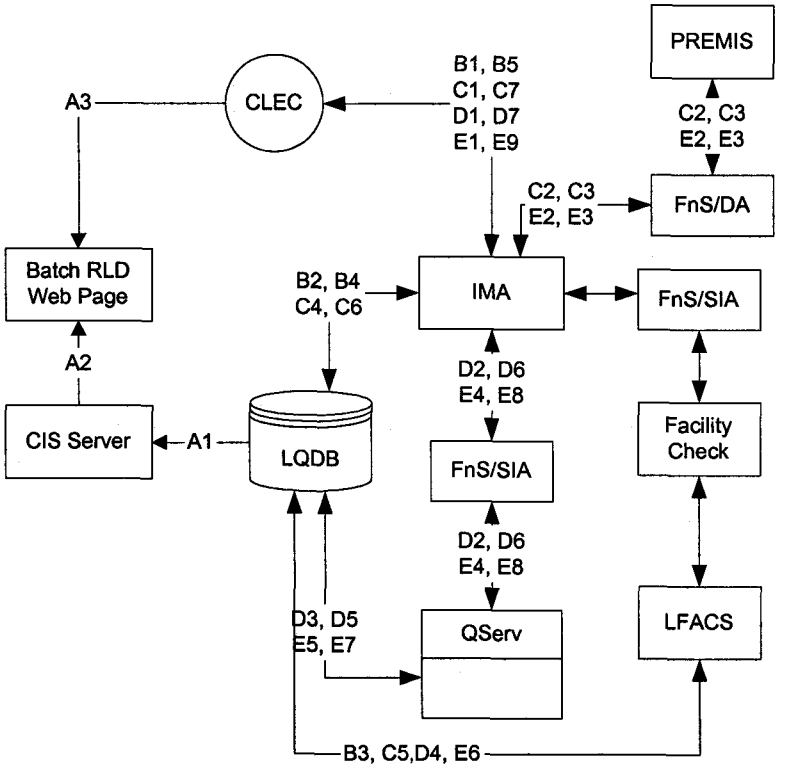
Facility-based CLECs who order unbundled loop products do have the remedial option (in addition to the auto qualification feature) of ordering loop-conditioning services from Qwest in order to qualify customers for DSL service. Examples of such options include the removal of load coils and bridge taps from a specified loop.

Qwest provides support to CLECs through its ISCs. Resellers receive support from the Complex Resale ISC in Minneapolis, MN. Facility-based DSL providers receive support from the Unbundled Loop ISC in Duluth, MN. These ISCs are staffed by Service Delivery Coordinators (SDCs), who are trained to process orders for DSL-related products and services. Resale SDCs perform loop qualifications on DSL orders using the Qwest DSL Qualification Tool, which returns loop results in the same manner ("yes" or "no" as the tools used by CLECs. The Qwest DSL Qualification Tool is the same tool used by Qwest retail representatives.

2.1.4 Qwest Wholesale Loop Qualification System Description

The diagram below illustrates the systems and flow that comprise the CLEC loop qualification query processes:

Figure 12.7-2: Wholesale Loop Qualification System Process



A1-A3 – Batch Raw Loop Data: Raw loop data is updated nightly to the CIS server. CLECs can access this data via the Qwest Web site using a digital certificate.

B1-B5 – IMA Raw Loop Data: Raw loop data for individual TNs is accessed via IMA. Data is drawn from the LQDB. LQDB queries a field in the LFACS database to determine whether any recent updates have been made to the database. Query results are returned to the CLEC via the IMA interface.

C1-C7 – IMA Raw Loop Data: Raw loop data address queries are validated in PREMIS. The query is then submitted to the LQDB, and Raw Loop Data results are returned to the CLEC via the IMA interface.[4]

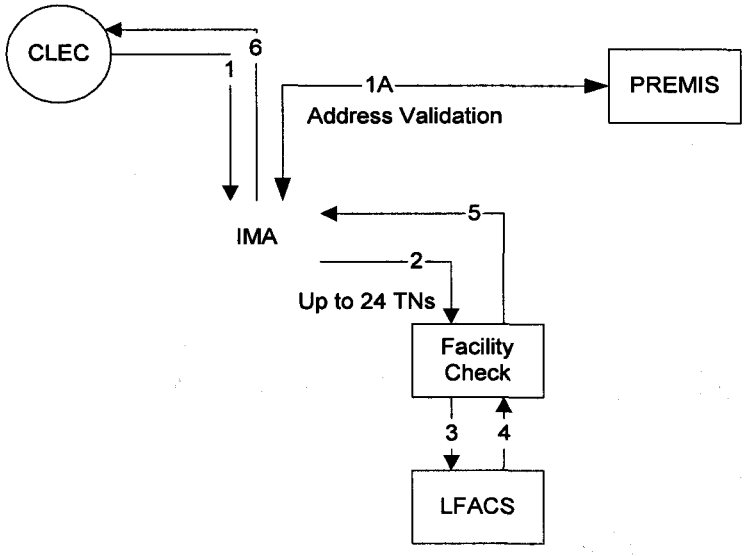
D1-D7 – Qwest DSL (Resale) Loop Qualification: Queries are submitted via IMA to QServ. QServ collects loop data from the LQDB and executes the algorithms to determine whether the specified loop qualifies based on the technical parameters for Qwest DSL service.[5]

E1-E9 – Qwest DSL (Resale) Loop Qualification: Queries based on customer address follow the same process as the Resale telephone number query (D1 – D7) above, except that the query first validates the given address in PREMIS.

System Performance/Database Updates: The LFACS and LQDB databases are the same databases used for retail loop qualification. The update procedures described in Section 2.1.2 also apply to this section.

The flow for the Unbundled ADSL Loop Qualification process is depicted below. The ADSL Loop Qualification Tool is used prior to submitting a Local Service Request (LSR) for an Unbundled Local Loop. This tool enables the CLEC to verify the type of facility and the loop make-up of the Unbundled Local Loop prior to order submission.

Figure 12.7-3: Unbundled ADSL Loop Qualification Process



[4] FnS/DA is an acronym for Fetch 'n Stuff / Data Arbitor
[5] FnS/SIA is an acronym for Fetch 'n Stuff / Safe Information Access

1. CLEC accesses IMA for loop qualification by TN; CLEC enters TN.
1A. IMA accesses PREMIS to validate addresses or working TNs; PREMIS returns results.
2. IMA sends TN to Facility Check.
3. Facility Check queries LFACS to verify that data is current.
4. LFACS returns data to Facility Check for loop qualification determination.
5. Facility Check sends loop qualification result to IMA.
6. IMA sends loop qualification result to CLEC.

CLECs submit queries via IMA. Address-based queries determine the validated addresses or working TNs in PREMIS. PREMIS is the system used by IMA GUI, IMA EDI, and other applications as a source of address validation information. It is used by Qwest retail and wholesale operations. TN data is submitted to Facility Check. Facility Check draws loop make-up characteristics from the LFACS database, and performs algorithms to determine whether the loop will support DSL service. Results are then returned to the CLEC via IMA.

2.2 Scenarios

Scenarios were not applicable to this test.

2.3 Test Targets & Measures

The test targets were the loop qualification processes and procedures used by Qwest to support both retail and wholesale customers. Processes, sub-processes, and evaluation measures are summarized in the following table.

Table 12.7-1: Test Target Cross-Reference

Process	Sub-Process	Evaluation Measure	Test Cross-Reference
Loop Qualification Pre-Order query process	Pre-Order Receipt and Logging	Consistency between wholesale and retail processes	12.7-1-1, 12.7-1-2, 12.7-1-4, 12.7-1-7
Assemble Pre-Order Response	Delivery of Error Messages and Queries	Consistency between wholesale and retail processes	12.7-1-3
	Delivery of Response	Consistency between wholesale and retail processes	12.7-1-6, 12.7-1-8
Escalation Process	User-initiated Escalation	Consistency between wholesale and retail processes	12.7-1-3, 12.7-1-5, 12.7-1-9
Process Management	General Management Practices	Consistency between wholesale and retail processes	12.7-1-2, 12.7-1-3, 12.7-1-4
	Performance Measurement Process	Consistency between wholesale and retail processes	12.7-1-11

Process	Sub-Process	Evaluation Measure	Test Cross-Reference
Capacity Management	Capacity Management Processes and Procedures	Consistency between wholesale and retail processes	12.7-1-10

2.4 Evaluation Methods

KPMG Consulting utilized three methods of data collection for this evaluation. The evaluation included review of Qwest documentation of processes and procedures, management practices, and pre-order processes. Interviews and observations were held with Competitive Local Exchange Carriers (CLECs) to evaluate their collective experiences. KPMG Consulting used findings from Hewlett-Packard Consulting (HPC), which held the role of pseudo-CLEC (P-CLEC) during execution of Test 12, Evaluation of POP Functionality and Performance Versus Parity Standards and Benchmarks. In addition, KPMG Consulting conducted interviews and on-site observations with Qwest staff responsible for loop qualification processing.

2.5 Analysis Methods

Information gathered during on-site visits, through data requests, and from HPC's P-CLEC experience was evaluated against criteria defined by KPMG Consulting during the planning phase of the test. One component of this evaluation compared Qwest personnel, processes, and systems used to for wholesale loop qualification to those employed for retail loop qualification, in order to determine whether or not consistencies exist. Another component evaluated data gathered to determine if essential elements of Qwest's processes and systems are present, and whether or not defined process steps are followed.

3.0 Results Summary

This section identifies the discrete evaluation criteria and test results.

3.1 Results & Analysis

The results of this test are presented in the table below. Definitions of evaluation criteria, possible results, and exceptions are provided in Section II.

Table 12.7-2: Evaluation Criteria and Results

Test Cross-Reference	Evaluation Criteria	Result	Comments
12.7-1-1	The end-user information that is required prior to the submission of a loop qualification is the same for wholesale and retail orders.	Satisfied	End-user information that is required prior to the submission of a loop qualification is the same for wholesale and retail orders. Both retail and wholesale loop qualifications can be performed using either an end-user telephone number (TN) or street address. KPMG Consulting confirmed these submission requirements during interviews and observations with CLEC subject matter

Test Cross-Reference	Evaluation Criteria	Result	Comments
			experts (SMEs) who are responsible for qualifying loops. Requirements are documented and made available to CLECs and Qwest personnel. CLEC information is available on the Qwest Web site at http://www.qwest.com/wholesale/ima/gui/document.html, and in the *IMA* Loop *Qualification and Raw Loop Data Job Aid*. Loop qualification information for Qwest retail customers is available at: https://orderdsl.qwest.com/order/welcome.asp. KPMG Consulting also observed the loop qualification process in the Qwest retail and wholesale work centers in order to confirm that these activities were accurately and consistently practiced, as defined and documented above.
12.7-1-2	The loop qualification query process is consistent for retail and wholesale customers.	Satisfied	The loop qualification query process is consistent for retail and wholesale customers. Qwest retail customers can determine whether they qualify for DSL service through one of the following means: • Telephone inquiry • Qwest Web site query • Email or fax inquiry. Qwest wholesale customers use various loop qualification tools, via IMA, to obtain comparable information for their end-user customers. Wholesale customers can also obtain loop qualification information from Qwest's ISCs via the same means listed above. Qwest retail processes are documented on the retail Web site at https://orderdsl.qwest.com/order/welcome.asp. Qwest wholesale processes are documented on the wholesale Web site at http://www.qwest.com/wholesale/ima/gui/document.html. Qwest wholesale SDCs have access to additional process documentation via InfoBuddy, a Qwest internal, online job aid. During observations of Qwest retail and wholesale work center representatives, KPMG Consulting confirmed that the loop qualification process activities were accurately and consistently practiced, as defined and documented above. KPMG

Test Cross-Reference	Evaluation Criteria	Result	Comments
			Consulting also observed CLEC representatives submitting loop qualification queries using the processes documented above.
12.7-1-3	Processes and procedures are defined for addressing errors regarding loop qualifications in the retail and wholesale environments.	Satisfied	Processes and procedures are defined for addressing errors regarding loop qualifications in the retail and wholesale environments. If a CLEC receives a questionable "no" response from a loop qualification query to the Qwest DSL or ADSL Unbundled Loop Tools, it may check loop make-up information in the Raw Loop Data Tool. A retail customer who receives a "no" response when inquiring about DSL availability is informed that the relevant TN is not currently eligible for the service. KPMG Consulting observations of representatives in the Qwest retail and wholesale work centers confirmed that these activities were accurately and consistently practiced, as defined and documented. KPMG Consulting also observed CLECs using the procedures defined for addressing errors regarding loop qualifications.
12.7-1-4	The internal process flow used for loop qualification is consistent for retail and wholesale customers.	Satisfied	Qwest's internal process flow used for loop qualification is consistent for retail and wholesale customers. During interviews with CLEC SMEs, KPMG Consulting confirmed that the internal process flow used for wholesale loop qualifications is consistent with defined and documented Qwest processes. Requirements are documented and made available to CLECs and Qwest personnel. CLEC information is available on the Qwest Web site at https://orderdsl.qwest.com/order/welcome.asp, and in Qwest's document, *IMA Loop Qualification and Raw Loop Data CLEC Job Aid.* During initial testing, KPMG Consulting identified apparent discrepancies with Qwest's back-end systems that provide loop qualification results. KPMG Consulting issued Exception 3038. After completing additional interviews and document analysis, KPMG Consulting determined that internal process flows are consistent for both retail and wholesale

Test Cross-Reference	Evaluation Criteria	Result	Comments
			operations, and that back-end systems provide consistent results for both wholesale and retail queries. See Exception 3038 for additional information on this issue. Exception 3038 is closed.
12.7-1-5	Qwest contact information is readily available for retail and wholesale customers.	Satisfied	Qwest contact information is readily available for retail and wholesale customers. Interviews with CLEC SMEs verified that Qwest contact information is available on Qwest's Web site, and in documentation provided to CLECs by Qwest account managers. KPMG Consulting confirmed the availability of contact information with SMEs at CLECs. Documentation that describes the various Qwest departments and related SMEs is available to CLECs at https://www.qwest .com/wholesale/, and in the Qwest document, *Frequently Called Numbers – ISC – Wholesale.* KPMG Consulting verified the availability of this contact information during observations at both the Qwest wholesale and retail work centers. KPMG Consulting also observed SDCs providing contact information to end-users and CLECs. KPMG Consulting also observed CLECs accessing Qwest contact information on the Web site identified above.
12.7-1-6	The customer receives confirmation of the completion of a loop qualification, or can access the status of loop qualifications.	Satisfied	The customer receives confirmation of the completion of a loop qualification, or can access the status of loop qualifications. CLECs and retail end-users receive completion confirmations via the same vehicle through which they query. That is, if submitted in IMA, the customer will receive confirmation via IMA. During observations with CLEC SMEs who are responsible for receiving confirmation of loop qualification query completion, KPMG Consulting observed receipt of such confirmations. KPMG Consulting also observed receipt of loop qualification confirmations in the Qwest retail and wholesale work centers, to confirm that these activities were accurately and consistently practiced.

Test Cross-Reference	Evaluation Criteria	Result	Comments
12.7-1-7	Systems and processes are in place to allow wholesale and retail loop qualification queries to be performed using the customer address.	Satisfied	Systems and processes are in place to allow wholesale and retail loop qualification queries to be performed using the customer address. The database(s) used to qualify loops is the same for both the wholesale and retail organizations. All tools (the Qwest DSL Tool, the ADSL Unbundled Loop Tool, and the Raw Loop Data Tool for wholesale and the QCity/QServ Tool for retail) may be used to conduct loop qualifications based on the customer address. During on-site visits with CLECs, KPMG Consulting observed loop qualification queries being performed using the customer address. KPMG Consulting also observed loop qualification queries being performed with customer addresses in the Qwest retail and wholesale work centers, and confirmed that these activities were accurately and consistently practiced, as defined and documented above. [6]
12.7-1-8	Loop qualification response types that are provided are consistent between retail and wholesale customers.	Satisfied	Loop qualification response types that are provided are consistent between retail and wholesale customers. Loop qualification queries, by both retail and wholesale customers, result in one of the following response types: • Yes • No. Interviews with both CLEC SMEs and Qwest representatives verified that loop qualification response types that are provided are consistent between retail and wholesale customers. KPMG Consulting observations at Qwest retail and wholesale centers, and CLEC centers verified that personnel receive the same qualification response types. Identical query types for loop qualification resulted

[6] During the execution of Test 12, Evaluation of POP Functionality and Performance versus Parity and Standards and Benchmarks, Hewlett-Packard Consulting (HPC) identified an issue with Raw Loop Data Query pre-order functionality; see HPC's Exception 2063 for additional information. The specific discrepancy identified in E2063 is not addressed in the Test 12.7 Test Report because the issue in question has no comparable Retail equivalent. HPC Exception 2063 is closed. HPC subsequently issued Observation 2078 to monitor the above issue. The issue in question is scheduled to be resolved following Qwest's IMA version 9.0 implementation.

Test Cross-Reference	Evaluation Criteria	Result	Comments
			in the same response types.
12.7-1-9	The escalation process for loop qualifications is consistent for retail and wholesale customers.	Satisfied	The escalation process for loop qualifications is consistent for retail and wholesale customers. For loop qualification queries for which the qualification tools return a "no" response, CLECs can request an auto qualification feature, which periodically checks a loop to determine whether its qualification status has changed. In addition, facility-based CLECs may request loop conditioning services. In addition to the specific loop qualification remedial option escalations, the general escalation process is documented and made available to CLECs and Qwest personnel. CLEC information is available on the Qwest Web site at http://www.qwest.com/wholesale/clecs/exescover.html. Additional escalation process descriptive information is available in the Qwest documents, Escalation *Management Process for Design Services Bulletin Number: PB97028-5* and *Service Delivery Escalation/Status Process*. KPMG Consulting interviews with CLEC SMEs who are responsible for escalating orders confirmed that the Qwest escalation process, as defined and documented, is consistently practiced. At visits to Qwest work centers, KPMG Consulting also observed direct use of the escalation process.
12.7-1-10	The capacity management process for loop qualification is consistent for retail and wholesale customers.	Satisfied	Qwest's capacity management process for loop qualification is equivalent for retail and wholesale customers. Qwest's process for loop qualification capacity management is encompassed within its overall work center capacity management process. Qwest work center order volume is tracked, and is used to forecast future work volumes. Qwest uses this information to schedule resources for the retail and wholesale centers. Load and Resource Managers (LRM) are responsible for managing and monitoring order and/or call volumes, staffing levels, product trends, and capacity utilization. LRMs regularly compile various reports:

Test Cross-Reference	Evaluation Criteria	Result	Comments
			actual vs. projected volumes, in today/out today, and Automatic Call Distributor (ACD) logs. Qwest's capacity management procedures are documented and made available to CLECs and Qwest personnel. CLEC information is available on the Qwest Web site at http://www.qwest.com/wholesale /guides/forecasting.html.
12.7-1-11	Loop qualification performance measurement processes are consistent for retail and wholesale operations.	Satisfied	Qwest's performance measurement processes for loop qualification are consistent for retail and wholesale operations. Processes are in place to measure and report on the timeliness of loop qualification query responses. Qwest uses "time in" and "time out" as measurement indicators of system timeliness. For the Raw Loop Data Tool, the measurement is divided into two measurements: Retrieve Request Screen and Receive Response. The Qwest DSL Tool measurement begins with the Qwest DSL Facility Request and ends with the Loop Qualification Response. For the ADSL Tool, there are three types of loop qualification transactions measured: a request for one line by address, a request for one line by TN, and a request for 25 lines by address. The address request measures the ADSL Request Screen and ADSL Response Screen. The request by TN and the ADSL Loop Qual for 25 lines measures the Loop Qualification Request window appearing in IMA and the Loop Qualification Response window appearing. The performance measurement process is consistent for wholesale and retail organizations at Qwest. Both organizations use the process of monitoring "time in" and "time out" to measure performance. The wholesale and retail center managers are responsible for the performance measurement process. Actual data and benchmarks for Qwest DSL and ADSL loop qualification are available on the Qwest Web site at http://www.qwest.com/wholesale/results/index.html. Performance measurement data for the Raw Loop Data Tool is available in

Test Cross-Reference	Evaluation Criteria	Result	Comments
			the Qwest document *Performance Measurement Criteria for RLD Tool version 1.00.* Interviews with both CLEC SMEs and Qwest system SMEs verified that processes for performance measurement of loop qualification systems operate as defined and documented.

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