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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Qwest Communications	)	
International Inc.	)	
	)	WC Docket No. 02-148
Consolidated Application for Authority	)	
to Provide In-Region, InterLATA Services	)	
in Colorado, Idaho, Iowa, Nebraska	)	
and North Dakota	)	

REPLY DECLARATION OF LYNN M. V. NOTARIANNI
& CHRISTIE L. DOHERTY

Checklist Item 2 of Section 271(c)(2)(B)
Operations Support Systems

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REPLY DECLARATION OF LYNN M. V. NOTARIANNI
& CHRISTIE L. DOHERTY

Checklist Item 2 of Section 271(c)(2)(B)
Operations Support Systems

1. Pursuant to 47 C.F.R. § 1.16, Lynn M. V. Notarianni and Christie L. Doherty declare as follows:

2. My name is Lynn M. V. Notarianni. I am a Director in the IT Wholesale Systems organization at Qwest IT, a unit of Qwest. My business address is 930 15th Street, Denver, Colorado, 80202. I am the Declarant in connection with Sections II, III(G), V, VII and VIII of this Reply Declaration.

3. My name is Christie L. Doherty. I am Vice President – Wholesale Service Delivery at Qwest Services Corporation, a unit of Qwest. My business address is 1005 17th Street, Room 1750, Denver, Colorado, 80202. I am the Declarant in connection with Sections I, III(A-F, H), IV and VI of this Reply Declaration.

I. COMMERCIAL PERFORMANCE RESULTS (MAY/JUNE)

4. In January through April, Qwest's overall commercial performance for the vast majority of PIDs relating to OSS in the Application states was strong. [1] Qwest's strong performance in connection with these PIDs continued in May and June. [2] The few instances in which Qwest did not meet a PID in the past two months are explained below.

A. Flow-Through (PO-2)

1. Idaho

5. Qwest missed the LNP benchmarks for PO-2B-1 in both May and June and PO-2B-2 in June. [3] For PO-2B-1, which measures (LNP) LSRs

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[1] *See* OSS Decl. at ¶¶73-77, 80-84, 89-93, 97-101, 104-108, 120-129, 132-136, 142-146, 148-152, 170-174, 178-182, 188-192, 212-231, 236-250, 253-257, 262-300, 309-331, 335-339, 430-434, 439-444, 446-450, 532-536, 539-543, 546-554, 558-568, 572-576, 648-652, 692-695, 740-741.

[2] *See* Colorado Commercial Performance Results at 37 (GA-1), 38 (GA-2), 38 (GA-3), 38 (GA-4), 38 (GA-6), 39 (GA-7), 40-51 (PO-1), 56-57 (PO-3), 57-58 (PO-4), 59-65 (PO-5), 66 (PO-7), 73 (PO-16), 74 (PO-19), 76 (OP-2), 76 (MR-2), 77 (BI-1), 78 (BI-2), 79 (BI-3); Idaho Commercial Performance Results at 34 (GA-1), 35 (GA-2), 35 (GA-3), 35 (GA-4), 35 (GA-6), 36 (GA-7), 37-48 (PO-1), 53-54 (PO-3), 54-55 (PO-4), 62 (PO-7), 63-66 (PO-9), 69 (PO-16), 70 (PO-19), 72 (OP-2), 72 (MR-2), 73 (BI-1), 74 (BI-2), 75 (BI-3); Iowa Commercial Performance Results at 36 (GA-1), 37 (GA-2), 37 (GA-3), 37 (GA-4), 37 (GA-6), 38 (GA-7), 39-50 (PO-1), 56-57 (PO-4), 58-64 (PO-5), 65 (PO-7), 66-69 (PO-8), 72 (PO-16), 73 (PO-19), 75 (OP-2), 75 (MR-2), 77 (BI-2), 79 (BI-4); Nebraska Commercial Performance Results at 36 (GA-1), 37 (GA-2), 37 (GA-3), 37 (GA-4), 37 (GA-6), 38 (GA-7), 39-50 (PO-1), 55-56 (PO-3), 56-57 (PO-4), 58-63 (PO-5), 65-68 (PO-8), 71 (PO-16), 72 (PO-19), 74 (OP-2), 74 (MR-2), 76 (BI-2), 78 (BI-4); North Dakota Commercial Performance Results at 30 (GA-1), 31 (GA-2), 31 (GA-3), 31 (GA-4), 31 (GA-6), 32 (GA-7), 33-44 (PO-1), 45-48 (PO-2), 49-50 (PO-3), 50-51 (PO-4), 59-62 (PO-8), 65 (PO-16), 66 (PO-19), 68 (OP-2), 68 (MR-2), 69 (BI-1), 70 (BI-2), 72 (BI-4).

[3] *See* Idaho Commercial Performance Results at 51 (PO-2B-1, PO-2B-2).

received via IMA-GUI, the volume continued to be extremely low in May and June, with only six and nine LSRs respectively. [4] For PO-2B-2, which measures (LNP) LSRs received via IMA-EDI, only one flow-through-eligible LNP LSR has been received in Idaho over the past twelve months. [5] This order was received in June and did not successfully flow-through.

6. Because the benchmark for PO-2B-1 and PO-2B-2 is 90%, Qwest could have only satisfied the benchmark in May and June by achieving 100% flow through. Clearly, the misses in May and June are *de minimis* and not indicative of Qwest's capabilities.

2. Iowa

7. Qwest missed the benchmark for LNP for PO-2B-2 in June. [6] As in Idaho, only one flow-through-eligible LNP LSR has been received in Idaho via IMA-EDI over the past six months. This order was received in June and did not flow-through. As described above, the June result is not indicative of Qwest's capabilities of flowing through LNP orders.

3. Nebraska

8. Qwest missed the benchmark for PO-2B-2 for POTS Resale in June. [7] Sixty-four LSRs, from a single CLEC, fell out for manual handling and should have been rejected due to a mismatch between request type and

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4 *Id.*

5 *Id.*

6 *See* Iowa Commercial Performance Results at 53 (PO-2B-2).

7 *See* Nebraska Commercial Performance Results at 51 (PO-2B-2).

product. However, the LSRs were corrected and worked rather than rejected. The service center personnel involved have been coached, and Qwest has not seen the situation repeat.

B. LSR Reject Notice Interval (PO-3)

1. Iowa

9. Qwest missed the benchmark for PO-3C in June. This resulted from an error in Qwest's reporting that month. The error will be corrected effective with Qwest's July results, reported in August. However, Qwest manually re-calculated the June result adjusting for this error. This calculation showed that Qwest actually did meet the benchmark. Notably, Qwest met the benchmark for this PID in Iowa since September 2001. [8]

C. Firm Order Confirmations (PO-5)

1. Idaho

10. Although Qwest missed the benchmark for PO-5C(a) in June, the low volume of FOCs generated for Resale (only sixteen orders were received in June; Qwest provided FOCs on time for fifteen of them) suggests that the missed performance results in this month is *de minimis*. [9] The commercial data in June therefore are not truly indicative of Qwest's capabilities. With the

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8 *See* Iowa Commercial Performance Results at 56 (PO-3C).

9 *See* Idaho Commercial Performance Results at 57 (PO-5C(a)).

exception of this miss, Qwest met the benchmark for PO-5C(a) in Idaho since November 2001. [10]

2. North Dakota

11. Qwest missed the benchmark for PO-5D in May and PO-5C in June. [11] Qwest missed the benchmark for PO-5D in May despite the fact that it issued timely FOCs on four of the five ASRs that month. [12] Because the benchmark for PO-5D is 85%, Qwest could have satisfied the benchmark in May only if it had returned timely FOCs for all five ASRs (*i.e.*, 100% performance that month). Volumes of ASRs have varied between one and 12 a month over the past year, and, with the exception of May, Qwest met the PO-5D benchmark in each of the past 12 months, posting 100% performance in each month. Clearly, the miss in May is *de minimis* and not indicative of Qwest's capabilities.

12. Qwest missed the benchmark for PO-5C(a) in June, but, as with PO-5D in May (described above), volumes were exceedingly low that month. [13] In fact, only three manually-submitted LSRs were eligible for FOCs under PO-5C(a) in June, and Qwest returned timely FOCs for two of them. [14] With the exception of June, Qwest met the benchmark for PO-5C(a) in North

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10 *See id.*

11 *See* North Dakota Commercial Performance Results at 53 (PO-5C(a)), 57 (PO-5D).

12 *See id.* at 57 (PO-5D).

13 *See id.* at 53

14 *See id.*

Dakota in every month since November 2001. [15] Once again, this miss should be considered *de minimis* as it is not indicative of Qwest's capabilities.

D. Jeopardy Notice Interval (PO-8)

1. Colorado

13. Qwest missed the parity standard for PO-8A (Non-Designed Services) in June because of differences in the amount of lead time it had, on average, to provision Non-Designed Services for Retail and Wholesale. [16]

14. The standard interval for Non-Designed Services for both Retail and Wholesale is exactly the same, three days. However, the intervals for CLEC and Retail orders for Non-Designed Services in June followed the same trend as that seen over the last 12 months. [17] The Retail orders included in the denominator for this period had a significantly longer average interval, often due to customer request, than the CLEC orders. As described in Qwest's initial OSS Declaration, this shorter interval for CLEC orders required Qwest to provision the order almost immediately after receiving it and left little time for the issuance of a timely jeopardy notice in cases where the order could not be provisioned. [18] The longer Retail installation intervals gave Retail the opportunity to issue jeopardy notices later and still have a longer Retail jeopardy notice interval.

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15 *See id.*

16 *See* Colorado Commercial Performance Results at 67 (PO-8A).

17 *See* OSS Decl. at 99-100.

18 *Id.* at 99.

15. Under the circumstances, Qwest's performance continued to be nondiscriminatory. As noted in Qwest's initial OSS Declaration (which continues to be true in June), when compared with the date Qwest received the orders, Qwest issued Wholesale jeopardy notices more quickly than Retail. [19] Only because Wholesale orders were submitted with less lead time was their average jeopardy notice interval shorter.

2. Idaho

16. Qwest missed the parity standard for PO-8A (Non-Designed Services) in June because, as in Colorado (discussed above), there were differences in the amount of lead time Qwest had, on average, to provision Non-Designed Services for Retail and Wholesale. [20] Under the circumstances, Qwest's performance was nondiscriminatory.

E. Timely Jeopardy Notices (PO-9)

1. Colorado

17. Qwest missed the parity standard for PO-9B (Unbundled Loops) in May and June. [21] Qwest also missed the standard for PO-9D (UNE-P POTS) in June. Generally, the misses for PO-9B and PO-9D in Colorado, as well as in the other Application states, are explained in part by the limitations inherent in the PO-9 measure, which is a probable candidate for revision

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19 *Id.* at 100.

20 *See* Idaho Commercial Performance Results at 63 (PO-8A).

21 *See* Colorado Commercial Performance Results at 68 (PO-9B) and 70 (PO-9D).

through the Long-term PID Administration process. [22] The misses for PO-9B also are explained by the fact that most unbundled loop jeopardies issued in advance of the due dates are issued because there are no available facilities. The very nature of these LSRs result in most of these orders never being completed under the guidelines set forth in Qwest's Build/Hold Process. Achieving parity under PO-9 for Unbundled Loops, as the PID currently is defined, therefore is difficult.

18. Although Qwest did not meet the parity standard in May and June in Colorado, the volume of missed due date orders for Unbundled Loops was small relative to the total volume of Unbundled Loop orders. This is because Qwest's performance under OP-3, which evaluated installation commitments met, was strong in Colorado. [23] Because Qwest met a high percentage of its installation commitments, fewer jeopardy notices had to be issued and evaluated under PO-9.

19. To further improve jeopardy notification, on June 17, 2002, Qwest installed an enhanced IMA notification process, which utilizes system-to-system capability to provide CLECs with automated jeopardy notifications for the following services: Non-Design, Unbundled Loops and UNE-P POTS. This process is expected to improve Qwest's ability to provide CLECs with timely jeopardy notices.

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22 *See* Performance Measures Reply Declaration at Section II.B.

23 *See* Unbundled Loops Declaration at Section II.C.4.a.

20. For PO-9D, Qwest missed the benchmark in June, but Qwest otherwise met the PO-9D benchmark in Colorado in ten of the past 12 months. [24] Clearly, there is no systemic problem here; the June result is not indicative of Qwest's capabilities.

2. Iowa

21. Qwest missed the parity standard for PO-9B (Unbundled Loops) in May and June. [25] As was the case in Colorado, these misses are partly attributable to the design of PO-9 and otherwise *de minimis* in light of Qwest's performance under OP-3 in Iowa [26] and its newly-installed enhanced IMA notification process.

3. Nebraska

22. Qwest missed the parity standard for PO-9B in June. [27] As was the case in Colorado and Iowa, these misses are partly attributable to the design of PO-9 and otherwise *de minimis* in light of Qwest's performance under OP-3 in Nebraska [28] and its newly-installed enhanced IMA notification process.

4. North Dakota

23. Qwest missed the parity standard for PO-9B in May and June. [29] As was the case in Colorado, Iowa and Nebraska, these misses are

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24 *See* Colorado Commercial Performance Results at 70 (PO-9D).

25 *See* Iowa Commercial Performance Results at 67 (PO-9B).

26 *See* Unbundled Loops Declaration at Section II.C.4.c.

27 *See* Nebraska Commercial Performance Results at 66 (PO-9B)

28 *See* Unbundled Loops Declaration at Section II.C.4.d.

29 *See* North Dakota Commercial Performance Results at 56 (PO-9B).

partly attributable to the design of PO-9 and otherwise *de minimis* in light of Qwest's performance under OP-3 in North Dakota [30] and its newly-installed enhanced IMA notification process.

24. Qwest also missed the standard for PO-9A in June. [31] But, this was the first time Qwest missed this PID in North Dakota since August 2001. [32] Clearly, this miss is *de minimis* and not indicative of Qwest's capabilities.

F. Time to Provide Usage Records (BI-1)

1. Idaho

25. Qwest missed the benchmark for BI-1B in Idaho in May 2002 by just over one percent. [33] Qwest achieved parity in eight of the last nine months. [34] Contributing factors for the miss in May included a processing error that required Qwest to re-transmit DUF files for jointly provided switched access to a CLEC and a delay in synchronizing the Qwest T/O point table with the Telcordia LERG. The DUF re-transmission was a one-time error that should not be repeated, and process improvements implemented should eliminate any delays in synchronizing the T/O table with the LERG.

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30 *See* Unbundled Loops Declaration at Section II.C.4.e.

31 *See* North Dakota Commercial Performance Results at 59 (PO-9A).

32 *See id.*

33 *See* Idaho Commercial Performance Results at 73 (BI-1B).

34 *Id.*

26. Also, in analyzing the reason for the miss, Qwest discovered that it had been calculating BI-1B to provide usage in calendar days rather than business days, as provided for by the PID definition. This did not affect the timeliness with which Qwest provided usage records to CLECs. Instead, this actually worked against Qwest by shortening the time in which Qwest could provide usage and still achieve the benchmark. Yet Qwest still obtained the benchmark in eight of the past nine months. [35] Qwest has implemented a change that will ensure the use of business days rather than calendar days in the reporting of BI-1B as of July 2002.

2. Iowa

27. Qwest missed the benchmark for BI-1B in Iowa in June 2002. [36] But, Qwest otherwise met the benchmark in 11 of the past 12 months. [37] As with Idaho, contributing factors for the miss in June included a processing error that required Qwest to re-transmit DUF files for jointly provided switched access to a CLEC and a delay in synchronizing the Qwest T/O point table with the Telcordia LERG. In addition, as described above, Qwest used calendar rather than business days to calculate the measure, reducing the number of days Qwest had to provide usage to CLECS and still achieve the benchmark. Without the reporting error, Qwest would have achieved parity in June 2002 as well.

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35 *Id.*

36 *See* Iowa Commercial Performance Results at 76 (BI-1B).

37 *Id.*

3. Nebraska

28. Qwest missed the benchmark for BI-1B in June. [38] The same reason that Qwest missed the benchmark in Iowa applies in Nebraska as well. Qwest would have met the benchmark for June 2002 had Qwest used business days instead of calendar days. And even by using calendar days, Qwest still achieved the benchmark in 11 of the past 12 months. [39]

G. Billing Accuracy (BI-3A)

1. Iowa

29. As reported in the June results, Qwest missed the parity standard for BI-3A in June by less than a quarter of a percent. [40] A CLEC opened a billing dispute, which Qwest resolved through its billing dispute process and credited the CLEC's account. In this case, the adjustment was large enough to cause Qwest to miss the parity standard. The PID performed as expected. Despite this miss, Qwest's performance has been above 96% for the past 12 months. [41]

30. Qwest has identified that the June reporting of BI-3A inadvertently excluded some adjustment data for both Wholesale and Retail. These results will be rerun and published with the July results. Preliminary

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38 *See* Nebraska Commercial Performance Results at 75 (BI-1B).

39 *Id.*

40 *See* Iowa Commercial Performance Results at 78 (BI-3A).

41 *Id.*

analysis indicates that the rerun of the data will not change the PID result with regard to whether Qwest met the standard.

2. Nebraska

31. Qwest missed the parity standard for BI-3A in May and June. [42] Qwest missed the parity standard in May because of Qwest's rate validation efforts. Qwest is in the process of completing its rate validation enhancements, and expects its performance to improve once completed, barring any one-time anomalies.

32. In June 2002, Qwest missed the parity standard for BI-3A by roughly a quarter of a percent because a CLEC that participated in one of KPMG's tests of Qwest's billing systems incorrectly was included in the calculation that measures Qwest's performance on BI-3A. Because Qwest maintained blindness during the test, it could not distinguish these test orders, issued by an operating CLEC, from actual production orders. Accordingly, Qwest appropriately assessed charges associated with these orders. When the test concluded and it was determined that these were test orders, not actual production orders, Qwest adjusted the participating CLEC's bills to remove these charges. Because these were not bill adjustments due to billing errors, but rather, appropriate adjustments to remove charges associated with test orders, these adjustments should not have been subject to BI-3A.

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42 *See* Nebraska Commercial Performance Results at 77 (BI-3A).

33. Furthermore, as with Iowa, a one-time adjustment to an individual CLEC from the conclusion of a billing dispute also caused Qwest to miss the parity score as reported in June. However, Qwest believes that when it republishes June's BI-3A results, as discussed above, it will meet the parity standard. Notably, however, Qwest's performance has exceeded 97% in ten of the past 12 months. [43]

3. North Dakota

34. Qwest missed the parity standard for BI-3A in June by just over one percent. [44] During hearings in Minnesota, certain CLECs indicated that Qwest had been charging Resale rates for OS/DA rather than a different rate. Subsequently, Qwest modified the rate and issued credits to affected CLECs. The credits took place in June and were a one-time adjustment that do not indicate any systemic problems with BI-3A. A one-time adjustment resulting from a closed billing dispute also caused Qwest to miss the parity standard. [45] Prior to June, Qwest had achieved parity since December 2001. [46]

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43 *Id.*

44 *See* North Dakota Commercial Performance Results at 71 (BI-3A).

45 Qwest believes that when it republishes June's BI-3A results, it will still miss the parity standard.

46 *See* North Dakota Commercial Performance Results at 71 (BI-3A).

H. Billing Completeness (BI-4A)

1. Colorado

35. Qwest achieved a Wholesale result of nearly 98% despite missing the parity standard for BI-4A by just over one percent in May and June. [47] Qwest missed the PID because certain orders requiring manual completion were completed late. Qwest has created new completion reports and processes that assist the service centers in assuring the timely completion of these manual orders.

2. Idaho

36. Qwest achieved a Wholesale result of 98.58% in May and 96.84% in June, despite missing the parity standard for BI-4A. [48] As with Colorado, Qwest missed the parity standard because certain orders requiring manual completion were completed late. Again, Qwest's new completion reports and processes will assist the service centers in assuring the timely completion of these manual orders.

I. Billing Completion Notices (PO-7A, C)

1. Nebraska

37. Qwest missed the parity standard for PO-7 in June 2002 by less than two percent. [49] A non-CLEC-affecting reporting problem overstated the length of time it took Qwest to provide such notices. Qwest will correct this

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47 *See* Colorado Commercial Performance Results at 80 (BI-4A).

48 *See* Idaho Commercial Performance Results at 76 (BI-4A).

problem effective with July 2002 results reported in August. Qwest's preliminary analysis indicates that this measure would have met the parity standard except for this reporting error. Despite the reporting error, Qwest had met the parity standard since January 2002.

2. North Dakota

38. Qwest missed the parity standard for PO-7 in June 2002 by less than two percent. [50] Like in Nebraska, a reporting error overstated the amount of time it took Qwest to provide such notices. Again, as in Nebraska, preliminary analysis indicates the measure would have met the parity standard, except for this reporting error. Despite the reporting error, Qwest still achieved parity since February 2002. [51]

J. Service Order Accuracy (PO-20)

39. Later in this declaration, Qwest will address why manual ordering accuracy is not a significant issue in its region. One of the ongoing efforts to ensure that manual order handling is not a problem in the future is the recent implementation of PO-20. Qwest voluntarily reported this new PID beginning with June 2002 results, reported in July. The PID currently is diagnostic. Service order accuracy is currently reported at a regional level and provides two product sub-measures. The first sub-measure is for Resale and UNE-P POTS, for which Qwest processed manual service orders without errors

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49 *See* Nebraska Commercial Performance Results at 64 (PO-7).

50 *See* North Dakota Commercial Performance Results at 58 (PO-7).

90.25% of the time. [52] The second sub-measure is for Unbundled Loops, for which Qwest processed manual service orders without errors 96.46% of the time. [53]

40. The most common error identified was an inaccurate PON on the order. While this does not cause a problem with the delivery of the requested services, it may cause manual effort for the delivery of status notices. An enhancement that will address these errors is scheduled for IMA 10.1, which will be implemented August 17, 2002. The enhancement will identify mismatches between the PON on the LSR, the PON on the service orders, and the service order numbers on the FOC. The identification of any mismatches will occur prior to the FOC being sent. This system enhancement will also address two other errors that were found. In total, if this enhancement had been implemented prior to June, the results for Resale and UNE-P POTS would have improved from 90.25 % to 93.65% and the Unbundled Loop results would have improved from 96.46% to 97.73%.

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51 *Id.*

52 *See* Colorado Commercial Performance Results at 75 (PO-20); Idaho Commercial Performance Results at 71 (PO-20); Iowa Commercial Performance Results at 74 (PO-20); Nebraska Commercial Performance Results at 73 (PO-20); North Dakota Commercial Performance Results at 67 (PO-20).

53 *Id.*

II. PRE-ORDERING

A. Loop Qualification Information

41. In its initial OSS Declaration, Qwest demonstrated that it provides the detailed, underlying loop make-up information identified by the Commission as necessary for CLECs to determine whether a loop can support the advanced services a CLEC seeks to provide. Qwest provides loop make-up information principally through two tools: the IMA Raw Loop Data Tool and the IMA Loop Qualification tool. Both of these tools provide detailed information about the loop, such as the presence of load coils or bridged taps, presence of pair gain, and length and gauge of the loop and loop segments. Reply Exhibit LN-1 (Data Elements in Loop Qualification Tools) specifically sets forth how Qwest's provision of loop qualification information to CLECs meets the FCC's requirements. [54] Once a CLEC obtains loop make-up information from the Raw Loop Data Tool, the CLEC then can apply its own DSL qualification algorithm (or the functional equivalent thereto) to the underlying make-up information to make a determination of loop suitability. [55]

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[54] *See Pennsylvania 271 Order,* 16 FCC Rcd at 17525 (App. C, ¶ 35); *UNE Remand Order,* 15 FCC Rcd at 3885 (¶¶ 426, 427, 429).

[55] Covad, for example, has stated that the Raw Loop Data Tool provides it with all categories of information it needs to determine if a loop will support its DSL service. "Covad has never invoked technical differences between its DSL products and that offered by any other entity to suggest that the [Raw Loop Data Tool] should provide different or additional types or categories of information. Covad has never stated in any testimony or brief that the categories of information provided by the [Raw Loop Data Tool] are insufficient for it to determine whether a loop meets Covad's technical needs."). Reply

42. In contrast, the tool used by Qwest retail representatives, described in Qwest's initial OSS Declaration, does not return information on the underlying make-up information for a loop. Rather, it returns a result that indicates if the end user's loop does or does not qualify for Qwest DSL service based upon the algorithm Qwest uses to determine if the loop can support Qwest DSL.

1. CLEC Comments Regarding Pre-order Mechanized Loop Tests

43. Two CLECs, AT&T and Covad, argue that Qwest does not meet its obligations because it has not created the functionality for CLECs to perform a mechanized loop test ("MLT") on a pre-order basis. These CLECs raised this issue and their arguments in the state proceedings, and the state commissions in each of the states included in this Application denied their demand. Thus, the state commissions have fully evaluated this issue already. [56]

44. There are several reasons why AT&T's and Covad's requests are unfounded. First, the Loop Qualification Tools and the Raw Loop Data Tool available via IMA are more comprehensive and accurate tools to verify that the loop can support the services the CLEC intends to provide over that loop facility than MLT. For example, the version of MLT currently deployed by

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Exhibit LN-2 (Covad Response to Qwest Motion to Compel Responses, MPUC Docket No. P-421/CI-01-1371, July 24, 2002).

Qwest does not report the presence of bridged taps and load coils, important information for determining whether a loop qualifies for advanced services. In addition, the MLT may provide misleading loop length information. Because it is a test that measures resistance on the line, an MLT may overestimate loop length by as much as 20 percent. Simply unplugging a telephone can change the reported MLT loop length.

45. Although the Qwest MLT will provide an indication that digital loop carrier equipment is present, it does not provide details of that equipment. The Raw Loop Data Tool, however, returns information about the presence, location, and type of digital loop carrier on the loop. The Loop Qualification Tool also presents information on the presence of pair gain. [57] Accordingly, a Qwest MLT will not provide more detailed or more accurate loop make-up information.

46. Second, the MLT loop length from an MLT distance data extraction conducted by Qwest more than two years ago has been incorporated into the Raw Loop Data Tool.[58] When Qwest first created the Loop Qualification Database, there was a limited amount of loop make-up information available to qualify facilities for xDSL services. Because of the lack

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[56] *See Colorado Hearing Commissioner Order on Requests to Modify Volume VA Order* at 6-8. *Multi-state Facilitator's Report on Checklist Items 2, 4, 5, and 6* at 66.

[57] The terms "digital loop carrier," or DLC, and "pair gain," or PG, are synonymous and are used interchangeably.

of loop length information at that time, Qwest performed some MLTs to extract MLT distance data and, together with other distance database record information, obtained the estimated loop length for the missing segments and algorithmically populated the appropriate data for those segment distances for which it applied in the Loop Qualification Database. The MLT information entered into the Loop Qualification Database as part of this data extraction was baseline information only and may not have reflected the actual length of a loop, as discussed above. Qwest subsequently, throughout 2001, embarked on an aggressive undertaking to add the feeder and distribution loop make-up information into the LFACS database, which feeds the Loop Qualification Database. Because both Qwest and CLECs use this database to perform loop qualification queries, and CLECs use this database to obtain raw loop data, this information is equally available to both Qwest and CLECs. Furthermore, as discussed herein, both the Raw Loop Data Tool and the IMA Loop Qualification Tool include loop length information in addition to the MLT length. In the Raw Loop Data Tool, loop gauge and segment length is provided. The Loop Qualification Tool includes the equivalent loop length, if available, [59] the loop length, and sub-segment loop length by gauge. This loop length information is more reliable than the length indicated by an MLT.

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58 MLT distance was only obtained and entered into the Loop Qualification Database for copper facilities.

59 Equivalent loop length estimates the length of the loop if the gauge of the loop were 26 gauge.

47. Fourth, an electronic MLT can only be performed by Qwest on loops with working telephone numbers that are connected to a Qwest switch. Thus, an electronic MLT cannot be performed on spare loop facilities, as spare facilities do not have working telephone numbers. Additionally, Qwest cannot perform an MLT on unbundled loops that have been provided to a CLEC because such a loop is no longer connected to a Qwest switch. Once the loop is unbundled from a Qwest switch and transferred to the CLEC switch, neither Qwest nor another CLEC would have the ability to perform a Qwest MLT on that loop. For the most part, provisioning of DSL loops are new connects rather than a conversion of an existing service. Therefore, an electronic MLT could not be performed.

48. Fifth, MLT is primarily a repair test. It is not meant to be nor was it ever designed to be used as a qualification tool for loops. The retail Qwest DSL pre-qualification process does not include "live" MLT testing. Retail sales employees are neither trained on nor do they have access to MLT. Those employees use the QServ tool that informs them if Qwest DSL is available at a specific address or telephone number. This is far less information than is provided to CLECs through the loop qualification tools as CLECs receive specific detailed information on loop makeup and length of the loop.

49. Sixth, if CLECs find conflicting loop make-up information in the tools, Qwest will conduct a manual search of its records to obtain loop make-up information. This manual process is described below.

50. Finally, contrary to Covad's speculation,60 Qwest is not withholding MLT information from CLECs. As discussed above, the MLT distance data that Qwest extracted was entered into the Loop Qualification Database that feeds the Raw Loop Data tool. Also, as discussed above, because the version of MLT used in Qwest's network does not return information on the presence of bridged taps and load coils, the MLT distance data extraction would not have had information on bridged taps or load coils.

51. The Alliance for Telecommunications Industry Solutions (ATIS) through its Ordering and Billing Forum (OBF) recognized the need for standardization in systems access and loop qualification information. The Local Services Ordering and Provisioning committee of the OBF addresses and resolves "issues focused on the ordering and/or provisioning of local telecommunications services using the Local Service Ordering Guidelines (LSOG)." [61] The LSOG, version 5, included guidelines on pre-order loop qualification information. Those guidelines do not include reference to providing MLT information as a pre-order loop qualification function. Accordingly, the industry standards organization has not determined that this information is necessary for loop qualification purposes.

2. CLEC Comments on "Direct" Access to LFACS

52. AT&T alleges that Qwest does not meet the requirements of the Commission's orders because it does not provide "direct" access to its

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60 Covad Comments at 19.

LFACS database. The underlying data source for the Raw Loop Data Tool is the Loop Qualification Database. The data source for the Loop Qualification Database and Facility Check, discussed in the initial OSS Declaration, is LFACS. Thus, CLECs are receiving loop make-up information from the LFACS database already.

53. There are a number of reasons to mediate access to back office systems. One reason for creating mediated access to back office systems is to enable the use of standardized interfaces. As previously mentioned, ATIS, through the OBF has established LSOG guidelines for the various interfaces that CLECs which operate nationally, like AT&T, will encounter with various ILECs.

54. The interfaces through which CLECs access Qwest's OSS are relatively new and were designed to follow the industry guidelines applicable to provider-to-provider arrangements as discussed above. In contrast, Qwest's downstream systems are proprietary and were developed over a period of many years for internal employee access to support service provided to end-user customers. These systems were not developed consistent with the OBF guidelines. Moreover, many of these systems, including LFACS, are not user friendly. As a result, the design of the electronic interfaces through which CLECs access Qwest's OSS and the design of the Qwest Retail systems themselves are, by their very nature, different.

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61 *See* http://www.atis.org.

55. Direct access means that a user interacts directly with an OSS. The user must use the specific commands known to the particular OSS, and interface with the specific screens and data contained on those screens. It would not be reasonable to expect each CLEC sales representative, taking orders in multiple jurisdictions, to learn all of the back office ordering systems used by each ILEC. It is much more logical for each CLEC sales representative to use one ordering interface for each ILEC and for those interfaces to follow the same guidelines for consistency. The interfaces take the data submitted by the CLEC representative and send it into the back office systems of the ILEC. While there may still be some variation from one ILEC ordering interface to the next, that variation is minimized because all of the ordering interfaces follow the same set of guidelines defined by the OBF. [62]

56. AT&T raised its claims for direct access to LFACs in the Colorado 271 proceeding and the Multi-State proceedings. All of the commissions in the states included in this application found that direct access was not necessary, and the mediated access Qwest provides is appropriate. [63]

3. Covad Comments on Colorado xDSL FOC Trial

57. Covad makes reference in its Comments to a trial conducted in Colorado on Qwest's provisioning of Firm Order Confirmations ("FOCs") for

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62 Mediated access also ensures that carriers only access customer information that they are authorized by the customer to view.

63 *See Colorado Hearing Commissioner Order on Requests to Modify Volume VA Order* at 6-8. *Multi-state Facilitator's Report on Checklist Items 2, 4, 5, and 6* at 66.

xDSL loops conducted over a year ago and claims, based upon this dated information, that the Raw Loop Data Tool is flawed. In March and April 2001, Qwest conducted a trial of its performance in providing FOCs for xDSL loops in Colorado. The purpose of the trial was to determine if moving from a 24-hour FOC to a 72-hour FOC would provide CLECs with a "more meaningful" FOC. This trial was also intended to evaluate whether the data contained in Qwest's Raw Loop Data Tool was accurate.

58. During the trial, there were instances in which the Raw Loop Data tool returned a response of "No Working TN." Upon investigation, Qwest determined that these responses related to non-published and non-listed numbers as well as loop make-up associated with Centrex or PBX systems. Based upon information learned in the trial and feedback received during the 271 workshops, Qwest made several improvements to the Raw Loop Data Tool. IMA Release 8.0, issued in August 2001, contained enhancements to the Raw Loop Data Tool which included:

- Loop make-up for non-published and non-listed telephone numbers.
- Loop make-up for telephone numbers associated with Centrex and PBX systems.
- Loop make-up information for spare facilities, including partially connected facilities (e.g., those connected from the crossbox to the customer drop).

- A "recent changes" check for updated loop make-up information in LFACS. If the Raw Loop Data Tool finds such a change, the updated LFACS information is returned. [64]

59. After the IMA Release 8.0, Qwest analyzed the occurrences from the Colorado trial that had resulted in a "No Working TN" condition using the new functionality in the Raw Loop Data Tool. As a result of the modifications deployed in August of 2001, the Raw Loop Data Tool successfully returned information on more than 99% of those telephone numbers and addresses. Thus, IMA Release 8.0 addressed the allegations in Covad's Comments regarding the orders that had originally resulted in a "No Working TN" response during the Colorado Trial.65 It also responds to Covad's claim that the Raw Loop Data Tool does not provide updated loop make-up information. [66]

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[64] In a recent *ex parte,* Covad suggested that there is a "pop up" screen that permits Qwest to "update" or "fill in" missing information in the Qwest retail loop qualification tools. *See* Covad July 23 Ex Parte. It appears that Covad is referencing a functionality that formerly existed in both the retail Qwest DSL tool and the Qwest DSL for Resale tool provided to CLECs that asked the user if it would like to request an investigation in the event the tool returned a message that indicated that the tool was unable to determine whether the loop qualified for Qwest DSL service. Qwest removed this functionality from both the retail and wholesale tools in December 2001. Qwest now has in place a manual process that permits CLECs to request a manual investigation in the event either the Raw Loop Data Tool or the Loop Qualification Tool returns incomplete or unclear information.

[65] Covad Comments at 20.

[66] Covad Comments at 18.

60. In October 2001, Qwest added an auto qualification functionality for Qwest DSL for Resale. With this enhancement, when the IMA Loop Qualification Tool returns a "not qualified" response, the CLEC has the option to have the loop periodically re-qualified.

61. As described in the initial OSS Declaration, Qwest deployed IMA Release 9.0 in February 2002, which contained an enhanced version of the Loop Qualification Tool. This tool, based on LSOG 5 guidelines, combines the functionality of the Qwest DSL for Resale and unbundled ADSL tools and provides loop make-up information in an industry-standard format. Qwest further enhanced the tool in a March 2002 9.0 Production Patch, with the introduction of loop make-up information on working unbundled loops assigned to CLECs.

62. Covad does not acknowledge the improvements that Qwest has made to the Raw Loop Data Tool, including the functionality of the IMA 9.0 Loop Qualification Tool, enhancements that have been implemented since the conclusion of the Colorado xDSL FOC Trial in April 2001.

63. Although Covad does not provide detail in its Comments, during the Colorado xDSL FOC trial, Qwest explained that some of the issues Covad raised also were the result of incorrectly reading the information in the Raw Loop Data Tool. For example, Covad states that 27 of the 975 orders it submitted during the trial (2.8% of queries) did not have MLT distance

information, and 14 orders (1.4%) did not have distance information. [67] However, Qwest explained during the trial that if a segment of the loop was on a pair gain system, the MLT distance would not be present. Thus, for those loops with pair gain, the Raw Loop Data Tool appropriately does not contain an MLT distance. With respect to the 14 orders alleged to lack distance information, as discussed above, the Raw Loop Data Tool and the Loop Qualification Tool provide a variety of loop length information.

64. Covad discusses what it calls "false positive" and "false negative" results from the Colorado trial. [68] As discussed in the trial, the "false positive" occurred in only about 1–2% of the loops evaluated. [69] The "false negatives" occurred when the Raw Loop Data Tool returned information that the queried facility was not a copper loop, but Qwest found a copper alternative. [70] As discussed below, however, Qwest does not require CLECs to pre-qualify loops prior to submitting an order. Even if the CLEC does not use the qualification tools or the tools suggest that a loop would not support xDSL service, the CLEC may submit the order, and Qwest will attempt to assign facilities to meet the parameters of the ordered loop. As a result of this process, Covad could receive information that indicates that the loop queried

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67 Covad Comments at 20.

68 Covad Comments at 20.

69 *See* Reply Exhibit LN-3 (Qwest Brief Re: Loop Issue 24, xDSL FOC Trial, CPUC Docket No. 97I-198T, July 21, 2001).

70 Covad Comments at 20.

would not support xDSL service, but still receive a clean copper loop in the provisioning process.

4. IDLC and Spare Facilities

65. AT&T states that it requires information regarding the presence of integrated digital loop carrier ("IDLC") and spare facilities in order to determine if a CLEC will be able to serve the end user. [71] All of the IMA loop qualification tools provide information regarding pair gain facilities on the loop. In addition, the Wire Center Raw Loop Data Tool provides information on the presence of pair gain devices on loops for an entire wire center. This web-based tool provides information in a comma delimited file that the CLEC can download onto an Excel spreadsheet or other data application and then sort according to the information of interest to the CLEC, including sorting to identify the presence of pair gain. Through this tool, CLECs can identify communities in which IDLC is or is not prevalent.

66. As discussed herein, IMA Release 8.0 added spare facility information to the Raw Loop Data Tool. By using an Unassigned Address query, the CLEC can obtain information on (i) Connected Facilities, indicated by "CF" in the Loop Status field, which is a non-primary end-to-end loop; (ii) Connected Through facilities, shown as "CT" in the Loop Status field, which is a primary connected through spare; and (iii) Partially Connected Facilities, shown as "PCF," which means that the loop is connected in the latter

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[71] AT&T Comments at Finnegan/Connelly/Menezes Decl. at ¶126.

segments, such as from the cross-box to the customer. Thus, the Raw Loop Data Tool currently provides information on spare facilities that are not connected to the Qwest switch.

5. Audit

67. Covad states that CLECs should be able to request an audit of Qwest's loop qualification information to ensure parity of access and information in the future. [72] The Loop Qualification Tool, Raw Loop Data Tool, and Qwest's manual loop make-up request process provide CLECs with underlying loop make-up information from Qwest's back office systems and databases and meet or exceed the FCC standards for providing loop qualification information.

68. Nevertheless, Qwest has been required by the Washington Utilities and Transportation Commission (WUTC) to modify its Washington SGAT to allow CLECs to audit the loop qualification tools at the CLEC's expense. [73] Consequently, Qwest will agree to include the audit language specified by the WUTC in other state SGATs as the opportunity arises. [74]

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72 Covad Comments at 17.

73 *See* Reply Exhibit LN-4 (Washington Commission 28th Supplemental Order Addressing Workshop 4 Issues and 31st Supplemental Order Addressing Petitions for Reconsideration). The New Mexico Commission in July 2002 required Qwest to incorporate similar audit language.

74 The SGAT language provides:

> 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

Because Qwest's loop qualification tools and processes conform to the requirements set forth by this Commission, Qwest believes such audits would be infrequent.

6. Manual Loop Make up Search and 11-step Provisioning Process

69. The issues commenting CLECs raise regarding the accuracy of the information in the loop qualification tools and the ability to obtain information from Qwest's back office systems are addressed by the manual loop qualification process that Qwest has implemented as well as its facility assignment process.

70. Under the manual loop make-up process, CLECs may obtain loop make-up information if the Raw Loop Data Tool or Loop Qualification Tool provide incomplete or unclear loop make-up information for a particular address or telephone number or if the CLEC provides information that demonstrates that the loop information returned may be inaccurate. [75] In any of these situations, Qwest will perform a manual search of its back office

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> 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. *CLEC may request an audit of Qwest's company records, back office systems and databases pertaining to Loop information pursuant to Section 18 of this Agreement.*

See WA SGAT § 9.2.2.8 (emphasis added).

75 *See generally* SGAT § 9.2.2.8.

records, systems and databases where loop information resides to obtain the loop make-up information.

71. If the loop make-up information is missing for a particular loop segment, Qwest will investigate its outside plant engineering records for the cable and pair from the central office to the serving area interface ("SAI"), and from the SAI to the customer's serving terminal. Qwest has agreed to return the loop make-up information to the CLEC via email within 48 hours. Qwest then will also update the applicable databases with the loop make-up information. Through this process, CLECs can request that Qwest investigate perceived inaccuracies.

72. Qwest also employs provisioning processes that address the CLECs' issues, such as the occurrence of "false negatives," and demonstrate that Qwest is committed to attempting to find facilities to meet a CLEC's order. As discussed in the Declaration of William M. Campbell, Qwest does not require CLECs to pre-qualify loops prior to submitting an order. [76] As stated above, even if the CLEC does not use the qualification tools or if the tools suggest that a loop would not support xDSL service, the CLEC may submit the order, and Qwest will attempt to assign facilities to meet the parameters of the ordered loop. As Mr. Campbell explains, Qwest uses the facility assignment process outlined in Exhibit WMC-LOOP-7 to seek provisioning alternatives, such as a line and station transfer, or conditioning a loop, when a copper

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[76] *See* Declaration of William M. Campbell on Unbundled Loops at ¶40.

alternative is necessary. As a result of this process, even if a CLEC does not use the tools or does not believe the tools are accurate, it may still submit its order, and Qwest will attempt to assign compatible facilities and provide the service to the CLEC according to the standard installation interval. CLECs are not foreclosed from submitting unbundled loop orders based upon the results returned in the loop qualification tools.

73. Qwest has worked continuously to improve the functionality of its loop qualification tools, including the implementation of a process for obtaining loop make-up information manually. To the extent CLECs believe that they require additional information to qualify xDSL services, the Change Management Process (CMP) provides a forum to raise such requests, evaluate them, and prioritize them.

B. Address Validation

74. AT&T claims that due to inconsistencies in Qwest's databases CLECs experience order rejections not experienced by Qwest when they use the service address information on the CSR to populate migration orders. [77] AT&T bases these claims on the fact that Qwest's systems validate addresses using a database (PREMIS) that is different from the database (CRIS) which serves as the source of the service order information on the CSR, and the address information in these two databases does not always match. [78]

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[77] AT&T Comments at 40, Finnegan/Connolly/Menezes Decl. at ¶¶136-138.

[78] *Id.*

CLECs have full access to the address information used by Qwest retail operations. PREMIS is the source of service address information for all services, regardless of service type, and is used for address validation in both Wholesale and Retail operations. CLECs can ensure that submitted LSRs successfully pass the address validation checks in LSR processing by using the recommended address validation query in IMA which returns PREMIS address information.

III. ORDERING

A. Manual Processing Errors

75. AT&T, Covad and WorldCom contend that KPMG's findings during the Third Party Test demonstrate that Qwest cannot manually process orders without error. [79] In fact, KPMG did not conclude Qwest had a problem with manual handling errors, and commercial evidence demonstrates CLECs are not materially affected by Qwest's manual processing of orders.

76. Issues arose regarding Qwest's ability to manually process orders correctly when KPMG found that it was "unable to determine" whether Qwest satisfied evaluation criteria 12-11-4 during the test. Evaluation criterion 12-11-4 assessed whether "Qwest-produced measures of Pre-Order/Order performance results for HP transactions [were] consistent with

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79 *See* AT&T at 41-41, Finnegan/Connolly/Menezes Decl. at ¶160-174; Covad at 39-42; WorldCom at 11-12, Lichtenberg Decl. at ¶¶39-45.

KPMG-produced HP measures." [80] To assess this criterion, KPMG conducted a comparative analysis of Qwest-produced HP measures to KPMG-produced HP measures. [81] Essentially, KPMG wanted to confirm that Qwest was accurately reporting its commercial performance for the Pseudo-CLEC.

77. KPMG raised a question regarding Qwest's reporting of performance data which prompted it to issue Exception 3120. Further retesting was conducted and Exception 3120 ultimately was closed/resolved. [82] However, in the course of retesting Exception 3120, KPMG found a handful of orders (eight) that were unexpectedly manually processed by the Qwest Service Center because they did not flow-through. [83] Of these eight orders, one was

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80 *See Final Report* at 98-99.

81 *See id.* at 98.

82 *See* Attachment 5, Appendix G, Disposition Report for Exception 3120, May 23, 2002, *also available at* www.nrri.ohio-state.edu/oss/master/exceptions/may/ e3120disposition_report.pdf, at 1.

83 These eight orders did not flow-through for good reason. There was a legitimate pending order on the account, which, by definition, required the orders to drop out for manual processing. The pending order in this case was caused by the provisioning of the test bed for Exception 3120.

not manually processed correctly, and this was because of human error. [84] As a result, KPMG issued Observation 3110. [85]

78. Notably, KPMG issued an Observation (3110) – not an Exception – because of this one human error, and KPMG at no time determined that Qwest does not consistently process manual orders correctly. Nevertheless, Observation 3110 prompted KPMG to subsequently review 109 orders from earlier re-testing that did not flow-through. Of those 109 orders, KPMG determined that it could not evaluate 60 because those orders contained previously identified test issues that, though resolved, invalidated their use in the sample set. Thus, of the 109 orders, KPMG evaluated 49. In doing so, KPMG identified seven instances of human error. [86] As a result, KPMG was unable to determine whether Qwest met evaluation criterion 12-11-4 because, without further retesting focusing solely on a valid representative sample pool of orders that drop out for manual handling, KPMG could not assess the impact of human error on the accuracy of and completeness of Qwest's PID

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84 The error was made when an order came in on a Saturday with a same day due date, and the SDC failed to change the application date from Saturday to Monday, as required by the PID governing application date. An error unrelated to these manually processed orders also was made during the test when an SDC improperly interceded in a single flow-through order and mistakenly changed the due date. This type of error should no longer occur because a system enhancement has been added to segregate flow-through and non-flow-through orders into different work queues.

85 *See* Attachment 5, Appendix G, KPMG Second Response for Observation 3110, May 28, 2002, *also available at* www.nrri.ohio-state.edu/oss/master/observations/may/o3110kpmg_second_resp.pdf, at 1.

86 *See id.* at 4.

reporting. [87] Because KPMG did not conduct a retest designed to determine the frequency and impact of manual processing errors, it made no conclusion regarding whether there is a significant issue with human errors in this context. [88] Consequently, Observation 3110 was closed/unresolved and evaluation criterion 12-11-4 was deemed "unable to determine." [89]

79. It is worth noting at the outset that KPMG's concerns were based on errors made by Qwest in the manual processing of a mere one LSR, and later seven LSRs, none of which came from a representative sample set. It can hardly be said that errors in manually processing a mere eight orders amounts to a systemic or widespread problem with Qwest's manual order processes.

80. Commercial evidence demonstrates that CLECs are not suffering material effects from human errors. During hearings on the OSS test, AT&T claimed CLECs could suffer 3 potential impacts from manual processing errors: (1) longer due dates, (2) erroneous rejects, and (3) improperly installed

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87 *See Final Report* at 98-99.

88 *See* Attachment 5, Appendix P, Colorado OSS hearing, June 10, 2002, p. 156, lines 11-24.

89 *See id.* KPMG also was "unable to determine" whether Qwest satisfied evaluation criteria 12.8-2 and 14-1-44 as a result of closed/unresolved Observation 3110. These evaluation criteria were discussed in the initial OSS Declaration.

services. [90] The evidence in the record demonstrates that CLECs are not suffering any of these potential impacts.

81. AT&T claims the manual processing errors result in it receiving longer due dates, [91] but the Liberty data reconciliation does not support this claim. [92] As demonstrated by the Reply Declaration of Michael Williams, Liberty analyzed more than 2000 unbundled loop orders, and only ten (les than 0.5%) contained an incorrect application date. Not one of these erroneous application dates resulted in the CLEC receiving a later than expected due date. [93] In addition, in evaluation criterion 12-5-8, KPMG found that Qwest assigned due dates consistent with the due dates requested by the Pseudo-CLEC. [94]

82. Additionally, in a statistical sample of manually processed orders processed in March, April, and May of this year, Qwest's internal numbers show that, with regard to application dates, it accurately processed between 96% and 99.5% of manual orders for Resale POTS, UNE-P POTS, and

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90 *See* Attachment 5, Appendix P, Colorado OSS hearing, June 11, 2002, pp. 92-93.

91 WorldCom makes a similar claim. *See, e.g.,* WorldCom Lichtenberg Decl. at ¶45.

92 *See* Attachment 5, Appendix G, Disposition Report for Observation 1033, *available at* http://www.nrri.ohio-state.edu/oss/master/observations/mar/o1033disposition_report.pdf.

93 *See* Michael Williams Reply Declaration at 25.

94 *See Final Report* at 82

Unbundled Loops. [95] Therefore, application date inaccuracies are not affecting interval calculations and reporting.

83. AT&T's second claim was that manual processing errors result in erroneous rejects because SDCs can mistakenly reject, rather than appropriately process, an order. Qwest tracks internally the number of times it manually rejects orders and subsequently issues FOCs. Based on this internal information, Qwest is confident that it currently rejects in error less than one percent of all manually processed orders. [96]

84. AT&T also claims that manual processing errors cause improperly-installed services; meaning, that certain features requested on the LSRs are not provisioned because of SDC mistakes. This issue too was not raised with any specificity in the comments. Nevertheless, it is worth noting that KPMG specifically tested this in the Third Party Test through evaluation criterion 14-1-12 – which evaluated LSRs submitted and compared the fields in those LSRs to the fields in the resulting CSR in Qwest's systems – and found this criterion "satisfied." [97] Similarly, KPMG evaluated whether Qwest switch translations contain required field inputs (14-1-3), and whether switch

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95 *See* Reply Exhibit CLD-5 (Qwest July 12 Ex Parte on Manual Service Order Accuracy); Reply Exhibit CLD-6 (Qwest July 18 Ex Parte on Manual Service Order Accuracy); Reply Exhibit LN/CLD-7 (Qwest July 19 Ex Parte on Billing, Bill Auditability, Manual Processing, Manual Service Order Accuracy, SATE and Interfaces), at 16. The business rules for determining these figures are the same as those used for proposed PID PO-20. *See* Performance Measures Reply Declaration.

96 *See* Reply Exhibit CLD-8 (July 12 Ex Parte on LSRs Rejected in Error).

translations with disconnect orders are executed with the proper intercept-recording message (14-1-4) and are completed on the committed due date (14-1-5). [98] KPMG found that Qwest "satisfied" those criteria as well. [99]

85. Qwest's commercial performance in connection with OP-5 shows that Qwest's overall provisioning of orders has been better for Wholesale than Retail over the past four months reflecting no competitive disadvantage to CLECs as a result of Qwest's provisioning quality. [100] This includes orders that were manually processed. Although it has been reported that OP-5, as designed, does not capture infrequent situations in which trouble tickets are not issued when a line or feature reported with a problem is not indicated on the order, these instances are rare and do not affect CLECs in a competitively material way. Qwest recently installed a new tracking process to measure these instances. This tracking process shows that for orders processed between June 28 through July 3, 2002, only 0.6% (68 LSR service order mismatches out of 12,171) of orders contained such errors. Preliminary analysis for July indicates that these numbers are trending even lower.

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97 *See Final Report* at 186-187.

98 *See id.* at 182-183.

99 *See id.*

100 *See* Qwest July 24 Ex Parte on May Performance Results; Qwest July 23 Ex Parte on June Performance Results.

86. More generally, in Test 12.8, which focused exclusively on manual order processes, Qwest satisfied nine of the ten evaluation criteria. [101] Clearly, the small number of human errors identified in the Third Party Test are within a reasonable tolerance level. Nevertheless, Qwest has – and continues to take – quality assurance measures directed at reducing the number of human errors in processing.

87. The first line of defense is the IMA edits. Qwest implements additional edits in every release of IMA, attempting to focus on those errors that are most prevalent on CLEC LSRs. This prevents Qwest's SDCs from receiving as many incomplete or inaccurate LSRs and reduces the potential for manual processing errors. In addition, Qwest has implemented – and plans to continue to implement – enhancements in its Flow-Through System to improve electronic flow-through rates. The majority of CLEC orders are now processed on a flow-through basis, and Qwest expects this trend to continue over time.

88. In addition to implementing system changes, Qwest has put in place an extensive quality assurance program to ensure that LSRs that drop out for manual processing are processed correctly. For example, a training curriculum exists for all SDCs so that they receive targeted training for the specific types of products and services they process. Qwest also has instituted quality reviews by SDC coaches, who examine orders processed by each SDC and provide them with individualized feedback on improving their performance,

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101 The remaining criteria (12.8-2) was deemed "unable to determine" as a

as needed. These coaches also perform trend analyses across all SDCs to determine whether errors that are made are common to all SDCs. If so, Qwest can issue a reminder Multi-Channel Communicator – the mechanism used to communicate system and process changes to the Qwest Service Centers – or, if needed, a new Job Aid. The existence of these training programs – and other support provided to CLECs by the ISC – contributed to KPMG's closing of Observation 3086. [102]

89. Although this training and guidance have proven to be useful tools in ensuring that SDCs manually process LSRs correctly, Qwest also has added enhanced edits in the SOP to prevent SDCs from making common errors when they convert an LSR that has dropped out for manual processing into a Service Order. This complements the training provided to the SDCs to minimize processing errors.

90. Although Qwest has implemented these measures, both individually and combined, to improve the accuracy of manual processing, the company recognizes that a new PID may be useful for monitoring its performance. That is why, in response to KPMG's April 30, 2002, "Qwest Manual Order Entry Performance Indicator Description Adequacy Study," [103]

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result of Observation 3110. *See Final Report* at 145-46.

[102] *See* Attachment 5, Appendix G, KPMG Second Supplemental Response for Observation 3086, April 12, 2002, *also available at* www.nrri.ohio-state.edu/ oss/master/observations/april/o3086kpmg_second_resp.pdf.

[103] *See* Exhibit LN-OSS-22 (Qwest Manual Order Entry Performance Indicator Description Adequacy Study); *see also* Qwest July 2 Errata.

Qwest agreed to develop and present a proposal for a new performance measure addressing manual processing order accuracy. [104] This new PID, designated "PO-20," will evaluate the degree to which Qwest accurately processes CLEC LSRs into Qwest Service Orders.

91. As described in the draft PID document, Qwest's proposal included a phased approached. The first phase, already implemented, is based on manual verification of specified field entries on a statistically valid number of orders. This serves as a starting point for further discussion and collaboration between CLECs, State staffs and Qwest on what should be included in the measure on a long term basis. The PID provides for later phases, which will include additional fields, the elimination of sampling, and the mechanization of data collection. Qwest has submitted PID PO-20 to the Long Term PID Administration forum.

92. It is worth noting that no CLEC requested a PID to evaluate Qwest's manual service accuracy when the PIDs were being designed. WorldCom candidly admits this in a supporting Declaration. [105] Moreover, in light of the time it often takes to negotiate a new PID, Qwest began reporting data under this measure with June results reported in July 2002, using its

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104 *See* Exhibit LN-OSS-22 (Qwest's Response to KPMG's Manual Order Entry PID Adequacy Study of April 30, 2002); *see also* Qwest July 2 Errata.

105 The PIDs in the ROC were agreed to by all parties with the exception of a feww impasse issues. None of which related to the addition of a service order accuracy PID. *See also* WorldCom Lichtenberg Decl. at ¶ 43 (CLECs "agreed that no service order accuracy measure is necessary.").

proposed PID as the basis of this measure. The data collected under PID PO-20 provides an additional source of information for Qwest to drive ongoing process improvements for manual handling. Information on Qwest's June results under PO-20 can be found in Section I(J).

93. Finally, it is worth noting that in the limited instances in which manual processing errors occur, CLECs currently have several resources to which they can turn and will soon have more. For instance, CLECs currently can use online status tools available through IMA to track their orders through to provisioning. Beginning with IMA 10.1, scheduled for release in August 2002, IMA will be enhanced to include a service order detail notice, which will be provided following the FOC. CLECs also can contact the Help Desk for any LSR-related issue, which is optimal for issues specific to a single LSR; contact the Service Management Team assigned to them if they believe there is a pattern of problems in connection with their LSRs; and, through the Change Management process, request system, product or process changes that would improve their interaction with Qwest.

94. In short, the results of the Third Party Test, including Liberty's data reconciliation process, support the notion that Qwest can manually process orders correctly. CLECs do not suffer material competitive harm from the limited human errors that can be made during manual processing. Qwest has – and continues to – put multiple measures in place to reduce the number of manually processed orders and potential for human error. Qwest has begun measuring service order accuracy under a new PID to

assist in tracking and reducing manual processing errors; the same measure will be refined through the collaborative efforts of CLECs, State staffs and Qwest in the Long Term PID Administration forum. And, a number of options are available to CLECs to assist them if an error occurs during the manual handling of an order.

B. Reject Rates

95. PO-4 measures the percentage of LSRs rejected for standard categories of errors/reasons. [106] Standard reasons for rejections are as follows: missing, incomplete, mismatching, or unintelligible information; duplicate request or LSR/PON (purchase order number); no separate LSR for each account telephone number affected; no valid contract; no valid end user verification; account not working in Qwest territory; service-affecting order pending; request is outside established parameters for service; and lack of CLEC response to Qwest question for clarification about the LSR. [107] As evident from these standard reasons for rejections, LSRs are typically rejected due to CLEC action and not for reasons within the control of Qwest.

96. Reject rates tend to be higher for LSRs that are auto-rejected rather than manually rejected because Qwest has up-front BPL edits for many reject conditions that prevent LSRs with errors from being submitted in IMA.

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106 *See* ROC PID 5.0 at 12 (PO-4).

107 *Id.*

[108] This is beneficial to CLECs because the rejection is transmitted instantaneously to CLECs to let them know that there is an error and to allow them to correct it immediately. However, not all CLEC errors can be caught by IMA and therefore, there exists a smaller percentage of LSRs that are manually rejected. Even in such instances, Qwest personnel can sometimes correct an error by contacting the CLEC instead of rejecting the order. Reject rates for LSRs submitted via facsimile tend to vary significantly since no up-front edits can be performed by Qwest and the quality and accuracy of the LSRs are entirely dependent on CLECs.

97. PO-4 is a diagnostic PID that is intended to provide information to help address potential issues. [109] Results for most submeasures of this PID are reported on a regionwide basis. Only the submeasure for LSRs received via facsimile is reported on a statewide basis. As shown in the table below, results for this PO-4 are reported based on the gateway interface or manual process used to submit the LSR. [110]

PID	LSR Submission
PO-4A-1	LSRs received via IMA and rejected manually
PO-4A-2	LSRs received via IMA and auto-rejected
PO-4B-1	LSRs received via EDI and rejected manually
PO-4B-2	LSRs received via EDI and auto-rejected
PO-4C	LSRs received via facsimile

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108 *See* Reply Exhibit CLD-8 (Qwest July 12 Ex Parte on LSRs Rejected in Error).

109 *See* OSS Decl. at §§233-250.

110 *Id.*

98. Qwest's reject rates over the past six months in the aggregate for all CLECs under the PO-4 submeasures reported on a regionwide basis (PO-4A-1, PO-4A-2, PO-4B-1 and PO-4B-2) are shown in the table below. [111]

Category	Jan	Feb	Mar	Apr	May	Jun
PO-4A-1	3.61%	3.71%	3.81%	3.75%	4.05%	4.36%
PO-4A-2	29.19%	29.62%	30.23%	30.92%	30.72%	31.30%
PO-4B-1	5.37%	6.12%	5.24%	8.48%	7.62%	8.19%
PO-4B-2	24.06%	23.14%	23.47%	22.73%	22.24%	24.11%

99. Qwest's reject rates over the past six months – in the aggregate for PO-4C (reported on a statewide basis) and on a CLEC-specific basis for all PO-4 submeasures – can be found below.

1. Colorado

100. The tables below identify CLEC-specific rejection rates under PO-4 in Colorado for select CLECs over the past six months. As the tables demonstrate, CLEC-specific rejection rates vary by CLEC and can be lower than the aggregate results for all CLECs. [112]

PO-4A-1	Jan	Feb	Mar	Apr	May	Jun
CLEC 1	0.83%	0.96%	0.60%	0.73%	0.93%	1.03%
CLEC 2	1.37%	0.66%	1.62%	0.59%	0.38%	1.07%
CLEC 3	2.36%	1.35%	1.69%	1.72%	2.68%	2.82%
CLEC 4	2.22%	1.10%	2.59%	2.08%	2.83%	2.21%

111 *See* Colorado Commercial Performance Results at 57-58 (PO-4A-1, PO-4A-2, PO-4B-1, PO-4B-2); Idaho Commercial Performance Results at 54-55 (PO-4A-1, PO-4A-2, PO-4B-1, PO-4B-2); Iowa Commercial Performance Results at 56-57 (PO-4A-1, PO-4A-2, PO-4B-1, PO-4B-2); Nebraska Commercial Performance Results at 56-57 (PO-4A-1, PO-4A-2, PO-4B-1, PO-4B-2); North Dakota Commercial Performance Results at 50-51 (PO-4A-1, PO-4A-2, PO-4B-1, PO-4B-2).

PO-4A-2	Jan	Feb	Mar	Apr	May	Jun
CLEC 5	10.17%	13.49%	12.39%	9.71%	9.94%	19.53%
CLEC 6	16.36%	13.99%	17.50%	19.08%	17.33%	7.14%
CLEC 1	9.02%	9.24%	9.92%	11.66%	12.42%	14.59%
CLEC 4	17.87%	22.11%	22.20%	20.72%	17.49%	16.50%

PO-4B-1	Jan	Feb	Mar	Apr	May	Jun
CLEC 7	2.37%	2.39%	2.74%	1.84%	1.88%	2.08%
CLEC 8	1.73%	1.67%	1.37%	1.87%	2.14%	1.67%
CLEC 9	4.60%	3.47%	3.72%	2.41%	1.32%	2.20%
CLEC 10	4.94%	6.38%	2.27%	2.05%	1.65%	1.26%

PO-4B-2	Jan	Feb	Mar	Apr	May	Jun
CLEC 11	18.46%	19.56%	16.55%	19.28%	15.62%	16.88%
CLEC 7	15.01%	14.70%	18.15%	16.21%	10.71%	11.54%
CLEC 9	16.23%	11.99%	8.63%	7.24%	5.28%	10.49%
CLEC 10	14.58%	14.47%	23.34%	15.79%	9.26%	13.26%

101. Reject rates under PO-4C on an aggregate basis for all CLECs in Colorado ranged from approximately 6% to 12% from January through June as shown in the table below. [113]

Category	Jan	Feb	Mar	Apr	May	Jun
PO-4C	6.19%	7.82%	9.41%	8.67%	10.86%	11.84%

2. Idaho

102. The tables below identify CLEC-specific rejection rates under PO-4 in Idaho for select CLECs over the past six months. As the tables demonstrate, CLEC-specific rejection rates vary by CLEC and can be lower than the aggregate results for all CLECs. [114]

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112 *See* Qwest July 17 Ex Parte on CLEC-Specific Results for PO-2 and PO-4.

113 *See* Colorado Commercial Performance Results at 58 (PO-4C).

114 *See* Qwest July 17 Ex Parte on CLEC-Specific Results for PO-2 and PO-4.

PO-4A-1	Jan	Feb	Mar	Apr	May	Jun
CLEC 3	2.36%	1.35%	1.69%	1.72%	2.68%	2.82%
CLEC 1	0.83%	0.96%	0.60%	0.73%	0.93%	1.03%
CLEC 12	2.42%	2.34%	1.60%	1.17%	2.65%	1.90%
CLEC 2	1.37%	0.67%	1.62%	0.59%	0.38%	1.07%

PO-4A-2	Jan	Feb	Mar	Apr	May	Jun
CLEC 6	9.02%	9.24%	9.92%	11.66%	12.42%	21.47%
CLEC 1	16.36%	13.99%	17.50%	19.08%	17.33%	14.59%
CLEC 7	20.54%	19.53%	19.32%	19.50%	20.43%	13.74%
CLEC 4	16.61%	20.77%	20.58%	19.21%	18.37%	16.50%

PO-4B-1	Jan	Feb	Mar	Apr	May	Jun
CLEC 9	4.60%	3.47%	3.72%	2.41%	1.32%	2.20%
CLEC 10	4.94%	6.38%	2.27%	2.05%	1.65%	1.26%
CLEC 8	1.73%	1.67%	1.37%	1.87%	2.14%	1.67%
CLEC 7	7.19%	6.84%	6.03%	4.71%	5.86%	2.08%

PO-4B-2	Jan	Feb	Mar	Apr	May	Jun
CLEC 11	18.46%	19.56%	16.55%	19.28%	15.62%	16.88%
CLEC 9	16.23%	11.99%	8.63%	7.24%	5.28%	10.49%
CLEC 10	14.58%	14.47%	23.34%	15.79%	9.26%	13.26%
CLEC 7	15.01%	14.70%	18.15%	16.21%	10.71%	11.54%

103. Reject rates under PO-4C on an aggregate basis for all CLECs in Idaho ranged from approximately 26% to 41% from January through June as shown in the table below. [115]

Category	Jan	Feb	Mar	Apr	May	Jun
PO-4C	26.03%	33.33%	41.18%	38.20%	35.42%	36.21%

3. Iowa

104. The tables below identify CLEC-specific rejection rates under PO-4 in Iowa for select CLECs over the past six months. As the tables

115 *See* Idaho Commercial Performance Results at 55 (PO-4C).

demonstrate, CLEC-specific rejection rates vary by CLEC and can be lower than the aggregate results for all CLECs. [116]

PO-4A-1	Jan	Feb	Mar	Apr	May	Jun
CLEC 1	0.83%	0.96%	0.60%	0.73%	0.93%	1.03%
CLEC 12	2.42%	2.34%	1.60%	1.17%	2.65%	1.90%
CLEC 3	2.36%	1.35%	1.69%	1.72%	2.68%	2.82%
CLEC 4	2.22%	1.10%	2.59%	2.08%	2.83%	2.21%

PO-4A-2	Jan	Feb	Mar	Apr	May	Jun
CLEC 1	9.02%	9.24%	9.92%	11.66%	12.42%	14.59%
CLEC 6	16.36%	13.99%	17.50%	19.08%	17.33%	21.47%
CLEC 3	20.54%	19.53%	19.32%	19.50%	20.43%	24.18%
CLEC 4	16.61%	20.77%	20.58%	19.21%	18.37%	16.50%

PO-4B-1	Jan	Feb	Mar	Apr	May	Jun
CLEC 9	4.60%	3.47%	3.72%	2.41%	1.32%	2.20%
CLEC 10	4.94%	6.38%	2.27%	2.05%	1.65%	1.26%
CLEC 8	1.73%	1.67%	1.37%	1.87%	2.14%	1.67%
CLEC 13	7.19%	6.84%	6.03%	4.71%	5.86%	5.21%

PO-4B-2	Jan	Feb	Mar	Apr	May	Jun
CLEC 11	18.46%	19.56%	16.55%	19.28%	15.62%	16.88%
CLEC 9	16.23%	11.99%	8.63%	7.24%	5.28%	10.49%
CLEC 10	14.58%	14.47%	23.34%	15.79%	9.26%	13.26%
CLEC 7	15.01%	14.70%	18.15%	16.21%	10.71%	11.54%

105. Reject rates under PO-4C on an aggregate basis for all CLECs in Iowa ranged from approximately 6% to 12% from January through June as shown in the table below. [117]

Category	Jan	Feb	Mar	Apr	May	Jun
PO-4C	8.13%	10.20%	8.90%	5.54%	6.78%	11.90%

116 *See* Qwest July 17 Ex Parte on CLEC-Specific Results for PO-2 and PO-4.

117 *See* Iowa Commercial Performance Results at 57 (PO-4C).

4. Nebraska

106. The tables below identify CLEC-specific rejection rates under PO-4 in Nebraska for select CLECs over the past six months. As the tables demonstrate, CLEC-specific rejection rates vary by CLEC and can be lower than the aggregate results for all CLECs. [118]

PO-4A-1	Jan	Feb	Mar	Apr	May	Jun
CLEC 1	0.83%	0.96%	0.60%	0.73%	0.93%	1.03%
CLEC 12	2.42%	2.34%	1.60%	1.17%	2.65%	1.90%
CLEC 16	1.69%	2.58%	2.12%	3.46%	3.76%	4.83%
CLEC 3	2.22%	1.10%	2.59%	2.08%	2.83%	2.21%

PO-4A-2	Jan	Feb	Mar	Apr	May	Jun
CLEC 1	9.02%	9.24%	9.92%	11.66%	12.42%	14.59%
CLEC 12	21.05%	21.06%	22.13%	19.07%	16.70%	18.62%
CLEC 6	16.36%	13.99%	17.50%	19.08%	17.33%	21.47%
CLEC 4	17.87%	22.11%	22.20%	20.72%	17.49%	16.50%

PO-4B-1	Jan	Feb	Mar	Apr	May	Jun
CLEC 7	2.37%	2.39%	2.74%	1.84%	1.88%	2.08%
CLEC 9	4.60%	3.47%	3.72%	2.41%	1.32%	2.20%
CLEC 10	4.94%	6.38%	2.27%	2.05%	1.65%	1.26%
CLEC 8	1.73%	1.67%	1.37%	1.87%	2.14%	1.67%

PO-4B-2	Jan	Feb	Mar	Apr	May	Jun
CLEC 7	15.01%	14.70%	18.15%	16.21%	10.71%	11.54%
CLEC 11	18.46%	19.56%	16.55%	19.28%	15.62%	16.88%
CLEC 9	16.23%	11.99%	8.63%	7.24%	5.28%	10.49%
CLEC 10	14.58%	14.47%	23.34%	15.79%	9.26%	13.26%

107. Reject rates under PO-4C on an aggregate basis for all CLECs in Nebraska ranged from approximately 18% to 31% from January through June as shown in the table below. [119]

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118 *See* Qwest July 17 Ex Parte on CLEC-Specific Results for PO-2 and PO-4.

119 *See* Nebraska Commercial Performance Results at 57 (PO-4C).

Category	Jan	Feb	Mar	Apr	May	Jun
PO-4C	17.58%	22.35%	29.36%	25.49%	31.25%	20.00%

5. North Dakota

108. The tables below identify CLEC-specific rejection rates under PO-4 in North Dakota for select CLECs over the past six months. As the tables demonstrate, CLEC-specific rejection rates vary by CLEC and can be lower than the aggregate results for all CLECs. [120]

PO-4A-1	Jan	Feb	Mar	Apr	May	Jun
CLEC 14	2.64%	1.26%	2.19%	1.61%	1.41%	1.23%
CLEC 1	0.83%	0.96%	0.60%	0.73%	0.93%	1.03%
CLEC 15	2.97%	3.09%	2.73%	2.76%	2.39%	2.57%
CLEC 2	1.37%	0.67%	1.62%	0.59%	0.38%	1.07%

PO-4A-2	Jan	Feb	Mar	Apr	May	Jun
CLEC 16	20.40%	23.91%	19.99%	17.64%	25.40%	21.10%
CLEC 5	10.17%	13.49%	12.39%	9.71%	9.94%	19.53%
CLEC 1	9.02%	9.24%	9.92%	11.66%	12.42%	14.59%
CLEC 7	16.61%	20.77%	20.58%	19.21%	18.37%	13.74%

PO-4B-1	Jan	Feb	Mar	Apr	May	Jun
CLEC 9	4.60%	3.47%	3.72%	2.41%	1.32%	2.20%
CLEC 17	7.44%	7.76%	3.75%	4.15%	3.86%	4.50%
CLEC 10	4.94%	6.38%	2.27%	2.05%	1.65%	1.26%
CLEC 7	2.37%	2.39%	2.74%	1.84%	1.88%	2.08%

PO-4B-2	Jan	Feb	Mar	Apr	May	Jun
CLEC 11	18.46%	19.56%	16.55%	19.28%	15.62%	16.88%
CLEC 9	16.23%	11.99%	8.63%	7.24%	5.28%	10.49%
CLEC 10	14.58%	14.47%	23.34%	15.79%	9.26%	13.26%
CLEC 7	15.01%	14.70%	18.15%	16.21%	10.71%	11.54%

120 *See* Qwest July 17 Ex Parte on CLEC-Specific Results for PO-2 and PO-4.

109. Reject rates under PO-4C on an aggregate basis for all CLECs in North Dakota ranged from approximately 6% to 12% from January through June as shown in the table below. [121]

Category	Jan	Feb	Mar	Apr	May	Jun
PO-4C	6.19%	7.82%	9.41%	8.67%	10.86%	11.84%

C. Flow-Through

110. Qwest's commercial performance results under PO-2B (in the aggregate) show that Qwest flowed through a high rate of flow-through-eligible orders from January through April, 2002. [122] Qwest has flowed through an even higher rate of flow-through-eligible orders in May 2002 and June 2002. [123] Qwest met the benchmarks for Unbundled Loops and UNE-P under PO-2B in each of the five states subject to the Application in each of the past two months. [124] Although Qwest missed the benchmarks for Resale orders submitted via IMA-EDI in Nebraska in June and for LNP in Colorado, Idaho

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121 *See* North Dakota Commercial Performance Results at 51 (PO-4C).

122 OSS Decl. at ¶¶309-331.

123 *See* Colorado Commercial Performance Results at 52-55 (PO-2B); Idaho Commercial Performance Results at 49-52 (PO-2B); Iowa Commercial Performance Results at 51-54 (PO-2B); Nebraska Commercial Performance Results at 51-54 (PO-2B); North Dakota Commercial Performance Results at 45-48 (PO-2B).

124 *See* Colorado Commercial Performance Results at 53, 55 (PO-2B); Idaho Commercial Performance Results at 50, 52 (PO-2B); Iowa Commercial Performance Results at 52, 54 (PO-2B); Nebraska Commercial Performance Results at 52, 54 (PO-2B); North Dakota Commercial Performance Results at 46, 48 (PO-2B).

and Iowa in May and June, the reasons for each of these misses are easily explainable and do not reflect a systemic problem. [125]

111. The commercial performance results also show that Qwest is capable of flowing through a high rate of UNE-P orders under PO-2B on a CLEC-specific basis, regardless of whether those orders are submitted via the IMA-GUI or IMA-EDI. [126] Commercial performance results on a CLEC-specific basis for UNE-P orders under PO-2B submitted via the IMA-GUI during the past six months are as follows:

STATE	CLEC	Jan	Feb	Mar	Apr	May	Jun
CO	CLEC 1	92.01%	87.84%	94.58%	90.77%	94.27%	91.59%
ID	CLEC 1	90.51%	92.16%	99.06%	83.16%	96.26%	97.12%
IA	CLEC 2	No data reported	No data reported	91.67%	94.37%	83.33%	100%
IA	CLEC 3	93.02%	94.12%	87.50%	85.00%	100.00%	86.96%
NE	CLEC 4	No data reported	97.47%	96.12%	95.88%	95.18%	98.53%
ND	CLEC 5	72.22%	76.19%	90.91%	66.67%	89.29%	92.31%

112. Commercial performance results on a CLEC-specific basis for UNE-P orders under PO-2B submitted via IMA-EDI during the past six months are as follows:

STATE	CLEC	Jan	Feb	Mar	Apr	May	Jun
CO	CLEC 1	77.94%	80.32%	89.84%	90.77%	84.73%	82.06%
ID	CLEC 1	83.38%	72.40%	83.95%	83.16%	88.95%	94.74%
IA	CLEC 6	No data reported	No data reported	No data reported	No data reported	96.69%	92.75%
NE	CLEC 1	83.33%	89.47%	100.%	85.71%	83.33%	100%
ND	CLEC 6	No data reported	No data reported	No data reported	No data reported	98.11%	100%

125 *See, infra,* Section I(A).

126 Additional CLEC-specific flow-through rates were provided in an ex parte submitted to the Commission. *See* Reply Exhibit CLD-9 (Qwest June 12 Ex Parte on Flow-Through and Manual Processing).

113. AT&T argues that Qwest's performance under PO-2A is deficient. AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶¶151-152. For each state subject to the Application, AT&T sets forth the aggregate April 2002 flow-through rate for each product evaluated under PO-2A. AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶¶ 153-159. CLEC-specific performance results for the very same month, though, reveal that Qwest is capable of flowing through a high rate of orders under PO-2A.

114. In April 2002 individual CLECs achieved the following flow-through rates in Colorado for each product measured under PO-2A: [127]

Product	CLEC	April 2002 Rate
Resale (GUI)	CLEC 1	100%
Resale (EDI)	CLEC 2	85%
Loops (GUI)	CLEC 3	89%
Loops (EDI)	CLEC 4	91%
LNP (GUI)	CLEC 5	64%
LNP (EDI)	CLEC 6	72%
UNE-P POTS (GUI)	CLEC 1	100%
UNE-P POTS (EDI)	CLEC 7	58%

115. In April 2002 individual CLECs achieved the following flow-through rates in Idaho for each product measured under PO-2A: [128]

Product	CLEC	April 2002 Rate
Resale (GUI)	CLEC 8	100%
Resale (EDI)	CLEC 7	71%
Loops (GUI)	CLEC 7	64%
Loops (EDI)	CLEC 7	61%
LNP (GUI)	CLEC 9	46%
LNP (EDI)	No data reported	No data reported
UNE-P POTS (GUI)	CLEC 7	70%
UNE-P POTS (EDI)	CLEC 7	50%

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127 *See* Colorado Commercial Performance Results at 52-55 (PO-2A).

128 *See* Idaho Commercial Performance Results at 50-52 (PO-2A).

116. In April 2002 individual CLECs achieved the following flow-through rates in Iowa for each product measured under PO-2A: [129]

Product	CLEC	April 2002 Rate
Resale (GUI)	CLEC 10	93%
Resale (EDI)	No data reported	No data reported (one LSR)
Loops (GUI)	CLEC 11	100%
Loops (EDI)	CLEC 12	42%
LNP (GUI)	CLEC 13	78%
LNP (EDI)	No data reported	No data reported
UNE-P POTS (GUI)	CLEC 7	100%
UNE-P POTS (EDI)	No data reported	No data reported

117. In April 2002 individual CLECs achieved the following flow-through rates in Nebraska for each product measured under PO-2A: [130]

Product	CLEC	April 2002 Rate
Resale (GUI)	CLEC 14	100%
Resale (EDI)	CLEC 7	81%
Loops (GUI)	CLEC 6	67%
Loops (EDI)	CLEC 7	66%
LNP (GUI)	CLEC 13	77%
LNP (EDI)	No data reported	No data reported
UNE-P POTS (GUI)	CLEC 7	100%
UNE-P POTS (EDI)	CLEC 7	40%

118. In April 2002 individual CLECs achieved the following flow-through rates in North Dakota for each product measured under PO-2A:

[131]

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129 *See* Iowa Commercial Performance Results at 51-54 (PO-2A).

130 *See* Nebraska Commercial Performance Results at 51-54 (PO-2A).

131 *See* North Dakota Commercial Performance Results at 45-48 (PO-2A).

Product	CLEC	April 2002 Rate
Resale (GUI)	CLEC 7	100%
Resale (EDI)	CLEC 7	15%
Loops (GUI)	CLEC 7	100%
Loops (EDI)	CLEC 7	68%
LNP (GUI)	CLEC 15	24%
LNP (EDI)	No data reported	No data reported
UNE-P POTS (GUI)	CLEC 16	13%
UNE-P POTS (EDI)	No data reported	No data reported

119. Although flow-through rates for LNP and UNE-P orders submitted via the IMA-GUI and Resale orders submitted via IMA-EDI were relatively low in April in North Dakota, these rates are attributable to low order volumes. [132]

D. Firm Order Confirmations and Due Date Changes

120. Covad claims that Qwest discriminates by sending them "fake FOCs." [133] Covad claims that Qwest sends multiple FOCs because it "is not doing the preliminary work necessary" prior to sending the FOC. [134] This is not true. [135] Qwest uses the FOC to communicate that Qwest has received the CLEC request, issued an internal service order and assigned a due date to the request. The FOC is also the appropriate vehicle to communicate due date changes, which occur for various reasons, depending on product.

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132 *Id.*

133 *See* Covad at 28-31.

134 *See* Covad at 29.

135 *See* Reply Exhibit LN/CLD-10 (Qwest July 10 Ex Parte on Billing, Bill Auditability, Manual Service Order Accuracy, Jeopardy Notices and Loop Qualification).

121. Specific Unbundled Loop products receive a "72 hour FOC", [136] which provides time for the service orders to progress through the provisioning process to the point where availability of compatible facilities can be determined. If Qwest determines during the 72 hours that there are insufficient facilities, Qwest sends Covad an FOC. Under these circumstances, other CLECs receive jeopardy notices; however, Covad requested – and Qwest agreed to send – FOCs to communicate the lack of compatible facilities. When facilities become available, Qwest sends another FOC to communicate the new due date. In this situation, Covad elected to receive multiple FOCs, [137] whereas other CLECs would only receive a single FOC to communicate the due date once facilities were available.

122. For products that are not covered by the 72-hour FOC, including but not limited to analog loops, Resale and UNE-P, Qwest may send a second FOC when, despite its best efforts to ensure meeting the original due date, a facility problem emerges. When a facility problem is detected after an FOC has been sent, Qwest first sends a jeopardy notice describing the problem and, when facilities are available, sends a new FOC reflecting the new due date.

123. A subsequent FOC is often sent to notify the CLEC of an improved due date. Based on agreed upon business rules, Qwest may need to

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136 ADSL compatible, xDSL-I capable, ISDN Basic Rate (BRI) capable, DS1 capable and 2-wire and 4-wire non-loaded loops all qualify for the 72 hour FOC.

137 This Covad specific process was eliminated by agreement of the parties effective June 17, 2002.

send more than one FOC on Unbundled Loops with line conditioning. Qwest's evaluation of the need for line conditioning is performed prior to the issuance of the FOC and, when necessary, the FOC due date reflects the standard interval for removing bridge taps and load coils. If Qwest is able to remove the conditioning devices early, or identifies other compatible facilities which will allow an earlier installation date, CLECs receive a new FOC with an improved due date.

124. For Line Sharing products, the process works differently. The 72 hour FOC process does not apply to Line Sharing because the standard interval is only three days. FOCs for Line Sharing requests are returned within 24 hours, including due dates reflecting the three-day standard interval even when the CLEC pre-approves conditioning work, should it be needed. Qwest completes the CLEC's request for a conditioning evaluation during provisioning, and, if necessary, Qwest issues a second FOC with a new due date that reflects the fifteen day standard interval for removing bridge taps and load coils. As with Unbundled Loops, if Qwest can complete the work early, the CLEC receives a third FOC with an improved due date.

125. Covad and AT&T specifically cite to the results of PID PO-15 results as evidence of Qwest's discriminatory practices. [138] Qwest has reviewed

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[138] *See* Covad at 28; AT&T at 40 and Finnegan/Connolly/Menezes Decl. at ¶¶140-141. AT&T merely references Qwest's PO-15 measurement without providing any instances of discriminatory treatment with regard to FOCs. The diagnostic PID PO-15 results are not an indication that Qwest's due dates are not reliable because PO-15 aggregates all products, which, by itself, would

the underlying orders and confirmed that many of the due date changes are related to improving due dates associated with conditioning (i.e., removing bridge taps and load coils). In fact, Qwest's analysis demonstrates that for the month of May, 29.8% of the orders included in the PO-15 measure were to change the due date to an earlier, CLEC approved due date. [139]

E. Service Order Completions

126. Covad claims that Qwest sends SOCs for line sharing services before the provisioning work is completed. [140] WorldCom makes a similar claim. [141] The incidence of service order completion occurring prior to physical completion has been addressed through process enhancements and compliance as explained in the Reply Declaration of Karen A. Stewart. [142]

F. Jeopardy Notices

127. WorldCom claims that Qwest is using jeopardy notices inappropriately after the issuance of an FOC. [143] As noted by WorldCom, the

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affect PID results. *See* Reply Exhibit CLD-11 (Transcript, New Mexico 271 Hearings, July 2, 2002) (Testimony of Michael Williams), at 92-96, 132-134. Moreover, PO-15 includes instances where Qwest advances a due date. *See id.*

139 Qwest analyzed 684 service orders included in the May PO-15 results. 402 of the 684 (58.8%) service orders completed prior to, or on the original Due Date. Of these, 204 (29.8%) service orders were included in PO-15 as a result of Qwest advancing the due date with CLEC approval. *See* Reply Exhibit CLD-12 (Due Date Change Analysis).

140 Covad at 25-28.

141 *See* WorldCom at 25 and Nielson Decl. at ¶4.

142 *See* Stewart Declaration; *see also* Reply Exhibit CLD-13 (Qwest July 12 Ex Parte on Line Sharing SOCs).

143 *See* WorldCom at 14 and Lichtenberg Decl. at ¶¶47-51.

use of a jeopardy notice was adopted by Qwest during the OSS Third Party Test. In response to concerns raised about the use of a reject notice once an FOC had been received, Qwest, using the CMP forum, sought CLEC input to address how to communicate errors (and other conditions) when necessary outside of the normal sequence of events. CLECs were of the opinion that Qwest should change its process to issue jeopardy notices in these situations.

128. Accordingly, Qwest initiated a change request to modify its process to ensure rejects were not issued after an FOC. Both the systems and the product/process CMP participants discussed this change. Several meetings were held where CLECs actively participated in negotiating CLEC response intervals that would prevent a due date change as well as how long Qwest would retain an LSR in pending status when no CLEC response was received. [144] As a result of these meetings, Qwest updated its business processes, updated its CLEC documentation [145] and implemented the revised process. This process is used under the following circumstances:

> (1) Duplicate Requests: The CLEC submits duplicate LSRs that are sent so closely together that Qwest cannot determine that the first one is already being processed. When this occurs, there are no pending service orders in the SOP to allow the system edit or

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[144] WorldCom incorrectly claims that Qwest rejects LSRs 4 hours after issuing these jeopardies if the CLEC has not responded (WorldCom at 14 and Lichtenberg Decl at ¶ 51). As negotiated in the CMP discussions, Qwest will hold an LSR for *30 business days* before rejecting due to lack of CLEC response.

[145] *See* www.qwest.com/wholesale/clecs/provisioning.html. *See* Exhibit CLD-OSS-17 (Provisioning Screen Shot). *See also* Exhibit CLD-OSS-20 (Jeopardy Notification Process Table).

Qwest Service Center to determine that the second LSR is a duplicate prior to processing it, resulting in an FOC being sent for both LSRs and a Jeopardy Notice being sent for the duplicate LSR;

(2) Inconsistent End User Data: There is inconsistent end user data, such as when an end user moves, and, after doing so, asks a CLEC to take over its service. In such cases, the CLEC submits the order using the old address and the error is recognized only once the order gets to the provisioning phase, resulting in a Jeopardy Notice after the FOC has been issued;

(3) CLEC Facility-Related: When a CLEC has sent LSRs for new service for two different customers but mistakenly has informed Qwest that the LSRs should be provisioned through the same "slot" or CLEC-assigned tie-down. In such cases, the CLEC and the Qwest Service Center validate the slot as good on the second LSR because the service order from the first LSR has not yet progressed to TIRKS so it appears the slot is available. An FOC is issued for the first and second LSR, and the first LSR is provisioned and assigned the slot. The second LSR falls out during provisioning because the CLEC assigned slot is now assigned to the new service from the first LSR. This results in a Jeopardy Notice for the second LSR.

(4) Not a Working Account: This is very similar to when there is inconsistent end user data (see number two above). On a conversion, the end user customer has placed a disconnect on the line/account. Close to the disconnect due date, the CLEC submits a conversion; however, because the disconnect order has not yet posted, the CSR still shows the account as live. The CLEC and flow-through/Qwest Service Center process the conversion, but it falls out in the provisioning process because the line/account to be converted has already been disconnected by the end user, resulting in the transmission of a Jeopardy Notice.

(5) Error in LSR Processing: An SDC happens to overlook a CLEC error on the initial LSR (but submits the service order so that a FOC issues), and the error is detected during the provisioning phase (resulting in a Jeopardy Notice being sent); or an SDC incorrectly believes he/she has found an error after initial processing.

129. Notably, most of these scenarios are within the CLECs' control. The fact that due to timing, Qwest is not able to detect these errors

until the requests progress into the provisioning phase is immaterial. The CLEC has made an error that must be corrected in order to ensure the ultimate customer, the end user, receives the service it expects. The CLEC community has expressed its desire to have these situations communicated via Jeopardy Notices. Qwest has listened to the CLECs and adopted this practice. [146] The final scenario is within Qwest's control and did impact WorldCom through a provisioning partner, Z-TEL, which is using IMA version 8.0. The UNE-P ordering rules changed between IMA version 8.0 and version 9.0. The LSRs submitted by Z-Tel were received and processed by the system, however, during quality checks, the center identified that the LSRs had not followed the current UNE-P ordering rules. It was legitimate for Z-TEL's orders to be submitted using the guidelines for IMA 8.0. However, because Z-TEL is the only UNE-P CLEC using the older version, the centers incorrectly applied the more current expectations. This has since been clarified with the centers. In addition, Z-TEL is currently testing IMA 10.0 with plans to migrate on September 9, 2002. When that happens, this problem will be completely eliminated.

130. Recent and past commercial performance shows that, contrary to AT&T and WorldCom's claims, Qwest provides timely Jeopardy Notices to

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146 *See* Attachment 5, Appendix O at Volume 4, Team Meetings (System CMP Team Meeting Distribution Package for 11/15/01).

CLECs. [147] Other than the misses explained in Section I, Qwest has met the benchmarks and parity standards for jeopardy notices. Further, Qwest's results for installation commitments met, OP-3, demonstrate that Qwest's performance regarding jeopardy notifications is not impeding the ability of CLECs to compete.

131. To further improve jeopardy notification, on June 17, 2002, Qwest installed an enhanced IMA notification process, which utilizes system-to-system capability to provide CLECs with automated jeopardy notifications for the following services: Non-Design, Unbundled Loops and UNE-P POTS. This process is expected to improve Qwest's ability to provide CLECs with timely jeopardy notices.

132. Based upon a result of 'not satisfied' given by KPMG for criterion 12-9-4 and 12-9-5, AT&T claims that Qwest does not provide timely jeopardy notices for resale and UNE-P. (Finnegan, Connelly, Menezes at ¶179). Criteria 12-9-4 and 5 were assigned a 'not satisfied' result because "the dual statistical test for the PO-9 PID resulted in a 'no-decision' for this PID." [148] The Dual Statistical Test resulted in inconsistent results because of the low number

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147 *See* Qwest July 2 Ex Parte (Commercial Performance Results for May and June) (PO-9); Colorado Commercial Performance Results at 67-70 (PO-9); Idaho Commercial Performance Results at 63-66 (PO-9); Iowa Commercial Performance Results at 66-69 (PO-9); Nebraska Commercial Performance Results at 65-68 (PO-9); North Dakota Commercial Performance Results at 59-62 (PO-9). *See also* (AT&T at 43 and Finnegan/Connolly/Menezes Decl. at ¶¶183-187; WorldCom at 12-15).

148 See KPMG Final Report at Section IV, Test 12, subsection 3.1, 12-9-4 and 5.

of jeopardy situations encountered during the test – which was the result of Qwest's excellent overall performance in provisioning. For example, for resale and UNE-P, Qwest met over 99% of its commitments during initial testing. Because there were so few missed commitments during testing, there were few opportunities for jeopardy notices to be sent. The "not satisfied" results for criteria 12-09-4 and 5 were based upon region-wide sample sizes of 8 and 11 orders that were not provisioned by the due date. [149] In the Colorado hearing on June 10, 2002, Mike Weeks of KPMG stated that, as the test vendor, they could not 'create' jeopardy notices because "We can't, as an outsider, submitting transactions, generate a situation for Qwest needing to send us jeopardy notice. As a tester, one can't cause that to happen. Those are conditions that have to exist inside of Qwest we didn't manufacture." [150]

133. KPMG has testified that the test results relating to jeopardy notices do not raise issues that should cause significant concerns. In presenting the ROC OSS test results to the Nebraska Public Service Commission, Michael Weeks of KPMG explained that the small sample size for jeopardy notices during the test was "good news." [151] Mr. Weeks further explained that determining when to issue jeopardy notices places Qwest in a 'catch 22' situation because of the unpredictability inherent in the day-to-day

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149 *See Final Report* at 92.

150 Attachment 5, Appendix P, Colorado Transcript of Proceeding, June 10, 2002, pp. 41-44.

appointment workload. If Qwest issues a jeopardy notice, it may nonetheless be able to complete the work; if Qwest does not issue a jeopardy notice, it may not be able to complete the work. [152] In either case, neither the CLEC nor its customer gets the expected result. On balance, however, Mr. Weeks stated that "I just don't think I would get all fussy about the fact that [Qwest's jeopardy notice performance is] in the state that it's in." [153]

134. In the Colorado hearing on June 13, Ms. Allstot, a member of the Colorado PUC staff, stated:

> The bottom line is that they do have evidence of commercial performance in these areas; so what the test is lacking, we do have in the record that there is commercial performance that establishes that Qwest does provide jeopardy notices..... Staff recommends that the Commission find that these criteria do not impact the CLECs ability to use Qwest's OSS. [154]

135. The Colorado PUC relied on Qwest's commercial data and "decided that the OSS test results do not adversely affect CLECs' ability to access Qwest's OSS [in connection Jeopardy Notices]. . . Commercial data is

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[151] *See* Attachment 5, Appendix K, Nebraska Transcript of Proceedings, May 29, 2002, pp. 11-12.

[152] Attachment 5, Appendix K, Nebraska Transcript of Proceedings, May 29, 2002, pp. 12-19.

[153] Attachment 5, Appendix K, Nebraska Transcript of Proceedings, May 29, 2002, p. 83.

[154] Qwest June 13 Supplemental Filing, Colorado Transcript of Proceeding, June 13, 2002, pp. 67-68.

more probative of test results here. . . To assure continued compliance in this area, Jeopardy Notices are included in the PAP." [155]

136. The Idaho Commission agreed: "Although the test indicated a failure in this area, the [Idaho PUC] finds Qwest's explanation that the test results are an anomaly of the test design to be convincing. . . Although Qwest is not consistently meeting parity for the Jeopardy Notice PIDs, the issue is included in the PAP, so the [Idaho PUC] fully expects Qwest to continue to work to improve its performance in this area." [156]

G. Pre-Order/Order Integration

137. AT&T claims that affirmations by Telcordia [157] and NightFire that they have developed integrated IMA-EDI interfaces are immaterial because they are not CLECs. [158] But, because CLECs use the interfaces developed by Telcordia and NightFire, their assertions show that CLECs are performing integrated pre-ordering and ordering activities. At the time that Telcordia affirmed to Qwest that it had developed an integrated IMA-EDI interface, it already had provided this software to four CLECs. [159] As of June 27, 2002, NightFire had successfully tested in Qwest's SATE on behalf of at least five

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155 *See* CPUC Evaluation at 37.

156 *See* IPUC Consultation at 8.

157 None of the companies referred to in this Section III(G) have been given any assistance by Qwest in EDI development that is not available to all CLECs.

158 AT&T Comments at 39 and Finnegan/Connolly/Menezes Decl. at ¶122.

159 *See* Exhibit LN-OSS-13 (Letter to Jeff Thompson, Qwest, from Richard Jocawleff, Telcordia, dated January 28, 2002).

CLECs through EDI "interfaces connect[ing] Qwest to its CLEC trading partners and allow[ing] CLECs to have fully automated interfaces requiring little to no manual intervention." [160] New Access, a CLEC that operates in Colorado, Iowa, Nebraska and North Dakota, also has verified that it performs pre-order/order integration through its IMA-EDI interface as of June 2002. [161] The number of orders that New Access has submitted in each of Colorado, Iowa, Nebraska and North Dakota is provided in Confidential Reply Exhibit LN-16 (New Access EDI Order Volumes – June 2002). [162] The rejection rates for New Access for June 2002 are set forth in Confidential Reply Exhibit LN-18 (CLEC Reject Rates).

138. HP's findings during the ROC OSS test confirm that achievement of successful integration through IMA-EDI is associated with a low rate of rejections. As HP has testified, it has built an EDI interface that integrates pre-order and order functionality. [163] For the four months between January 2002 and April 2002, out of a total of 889 UNE-P PID retest orders that HP submitted via its integrated IMA-EDI interface, only 12.15% of these

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160 *See* Reply Exhibit LN-14 (Letter to Jeff Thompson, Qwest, from Venkates Swaminathan, Nightfire, dated June 27, 2002).

161 *See* Reply Exhibit LN-15 (Letter to Jeff Thompson, Qwest, from David Lueck, New Access, dated June 19, 2002).

162 This information was provided in an ex parte submitted to the Commission. *See* Reply Exhibit LN-17 (Qwest July 25 Ex Parte on Pre-order/Order Integration).

163 *See* Attachment 5, Appendix P, Colorado OSS Hearing, June 10, 2002, pp. 89-97.

orders were rejected. [164] Additionally, HP affirmed that the errors that caused those rejects were attributable to issues unrelated to pre-order to order integration. [165]

139. AT&T claims that it has experienced significant problems in attempting to populate pre-ordering data electronically into an LSR. [166] The evidence, appears to show, in fact, that AT&T is successful in obtaining pre-order to order integration. [167] AT&T presents no specific evidence of integration difficulties except that parsed CSRs contain no field identifying the telephone numbers on a customer's account. [168] This claim is baseless as Qwest does, in fact, return working telephone numbers parsed on the CSR. [169] Despite AT&T's claim, it presents no valid evidence to support its claim that it has had difficulties integrating pre-ordering and ordering functions. WorldCom attributes its high rate of rejects to difficulties with pre-order to order integration. [170] The evidence also belies WorldCom's claim. [171]

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164 *See* Reply Exhibit LN-19 (Qwest July 29 Ex Parte on Pre-order/Order Integration).

165 *See id.*

166 AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶124.

167 *See* Confidential Reply Exhibit LN-18 (CLEC Reject Rates).

168 AT&T Comments, Finnegan/Connolly/Menezes Decl at ¶124, note 83.

169 *See* Exhibit LN-OSS-5, p. 28 (Appendix A – Developer Worksheets – Pre-Order).

170 Worldcom Comments at 7.

171 *See* Confidential Reply Exhibit LN-18 (CLEC Reject Rates).

140. Parsing and the development of integrated interfaces generally are by their very nature complex undertakings that require that both Qwest and CLECs work with technicians experienced in EDI development. Even though it is a complicated task, Qwest provides ample training and documentation to assist CLECs in developing and implementing integration capability. Additionally, Qwest offers CLECs parsing capability in accordance with the LSOG5 guidelines. In light of these factors, HP found that "a CLEC with the appropriate resources, funding, time and planning activities can build a CSR to LSR parsing interface." [172]

141. AT&T and WorldCom fail to acknowledge that Qwest offers integration capabilities not only through IMA-EDI, but also through the IMA-GUI. [173] The IMA-GUI integrates pre-order/order functionality on its own such that CLECs need not do anything to integrate. [174] Therefore even if CLECs do not wish to develop an integrated IMA-EDI interface, Qwest still provides them with the capability to obtain integrated access to pre-order/order functions through the IMA-GUI.

142. Reply Exhibit LN-20 (IMA-GUI Integration Fields) sets forth each data element that can be integrated in the IMA-GUI along with the field name and number, as well as the pre-order transaction from which the data

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172 *See* HP Pre-order to Order Integration Report at 9.

173 OSS Decl. at ¶201.

174 OSS Decl. at ¶196.

may be obtained. [175] Additionally, to ensure consistency and reduced complexity of integration, Qwest's IMA system is based on the OBF's LSOG5 guidelines for pre-order and order transactions, including the rules for parsing information on pre-order transactions. [176]

143. Qwest has integrated pre-order and order information in the IMA-GUI using the same set of technical documentation, Developer Worksheets, that it provides to CLECs to build an IMA-EDI interface. Developer Worksheets specify field lengths, field characteristics, and any conditions related to the usage of specific fields for specified products. *See* OSS Decl. at ¶197, Exhibit LN-OSS-5 (Appendix A – Developer Worksheets – Pre-order). This integration includes electronically transferring information from pre-order responses into subsequent pre-order transaction requests and transferring information from pre-order responses onto LSRs. Parsed CSR is an example of the integration achieved between pre-order and order information. Qwest's achievement of integration in the IMA-GUI using the same technical documentation as that provided to IMA-EDI CLECs demonstrates that CLECs can integrate pre-order and order functions in their EDI interfaces should they choose to do so.

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175 This information was provided in an ex parte submitted to the Commission. *See* Reply Exhibit LN-17 (Qwest July 25 Ex Parte on Pre-order/Order Integration).

176 Additional information was provided in an ex parte submitted to the Commission. *See* Reply Exhibit LN-17 (Qwest July 25 Ex Parte on Pre-order/Order Integration).

H. Other Ordering-Related Issues

144. WorldCom claims that Qwest fails the "same time and manner test" with regard to its ordering processes because it does not allow migration by name and telephone number (TN) and migration without features. [177] AT&T claims that Qwest takes an unduly long length of time to update Customer Service Record (CSR) CUS Codes. [178] Eschelon claims that CLEC-to-CLEC orders are prevented in Release 10.0 when account numbers are not populated. [179] Eschelon claims that Qwest requires excessive use of the manual handling indicator in placing orders. [180] I address each of these issues below.

1. Migration by Name and Telephone Number

145. WorldCom claims that Qwest's application is incomplete until it offers CLECs the ability to migrate by name and TN. [181] Neither WorldCom nor any other CLEC requested this capability through the Change Management Process, until the day that Qwest filed its Application. On June 13, 2002, WorldCom did submit a request to add this functionality. [182] Qwest has acknowledged the change request, conducted the CMP call for clarification meeting, and has supplied the CLEC community the work effort estimate. The

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177 *See* WorldCom at 5-6, 9-10, Lichtenberg Decl. at ¶¶13-16, 27-32.

178 *See* AT&T at 43-44, Finnegan/Connolly/Menezes Decl. at ¶¶201-208.

179 *See* Eschelon at 4-5.

180 *See id.* at 7, n13.

181 *See* WorldCom at 5-6, Lichtenberg Decl. at ¶¶13-16.

CLEC community is in the process of prioritizing this change for possible inclusion in IMA 12.0.

2. Migration Without Features

146. WorldCom claims that Qwest's application must be denied until it offers CLECs the ability to migrate orders without including a customer's unwanted existing features on the order. [183] Qwest initially implemented this capability in 1997. Due to significant issues experienced by the CLECs and their end users, related to missing features following conversions, Qwest modified its process to require a positive identification of the action to be taken for each existing feature. However, Qwest has recently received a change request through CMP to allow this capability for UNE-P migrations. [184] Qwest has acknowledged the change request and supplied the CLEC community the work effort estimate. The CLEC community is in the process of prioritizing this change for possible inclusion in IMA 12.0.

3. Customer Service Record (CSR) Updates

147. AT&T claims that Qwest takes an undue length of time to update Customer Service (CUS) Codes on the CSR and that this process denies CLECs a meaningful opportunity to compete. [185] Qwest updates the vast

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182 *See* Reply Exhibit CLD-21 (Change Request SCR061302-01).

183 *See* WorldCom at 9-10, Lichtenberg Decl. at ¶¶27-32.

184 *See* Reply Exhibit CLD-22 (Change Request SCR060702).

185 *See* AT&T at 43-44, Finnegan/Connolly/Menezes Decl. at ¶¶201-208.

majority of CSRs within a 3-to-5 day interval. [186] This interval is the same for both Wholesale and Retail accounts, because both organizations use the same Qwest systems to complete service orders, manage customer account information, and update CSRs. Further, CLECs are capable of submitting subsequent requests before the CSR has been updated. This process is clearly documented on the Qwest website.[187]

148. AT&T describes how – since February 2002 - it has used the CMP process to gain support for an automated solution that would replace the current process. [188] In response to AT&T's Change Request, [189] Qwest completed a work effort estimate and presented the proposed solutions at a CMP conference call on July 8, 2002. During the call, the CLEC community expressed no support or interest in proceeding with the request. The CLEC community believed that this solution would be voted low in the prioritization vote and voiced their concern that the request could possibly take up an entire IMA release. Based on this CLEC feedback, AT&T directed Qwest to update the status of this Change Request to "denied."

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186 *See Final Report* at 191 (Test criteria 14-1-13)

187 *See* http://www.qwest.com/wholesale/ima/gui/faq.html

188 *See* AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶206.

189 *See* Reply Exhibit CLD-23 (Change Request SCR 020802-01).

4. CLEC-to-CLEC Orders in IMA Release 10.0

149. Eschelon claims that CLEC-to-CLEC orders are prevented in Release 10.0 when account numbers (ANs) are not populated. [190] The release of IMA 10.0 impacted the ability of CLECs to electronically submit CLEC-to-CLEC migration orders from unbundled loop, but this impact only affected a handful of electronically submitted LSRs. CLEC-to-CLEC LSRs of this type account for approximately 0.23% of all LSRs. [191] Eschelon opened a trouble ticket on June 21, 2002, five business days after the release of IMA 10.0. Another CLEC opened a trouble ticket on June 25, 2002. The generic nature of the error condition and the varying CLEC descriptions did not allow the two tickets to be correlated. In both cases, Qwest advised the CLEC that the specific LSR could be submitted via fax to prevent delaying the delivery of service. Qwest identified the root cause of one of these reports on July 1, 2002. [192] Once the root cause for one ticket had been determined, Qwest found the cause applied to the second ticket as well. When Qwest recognized that the cause impacted this specific type of CLEC-to-CLEC migration, and affected more than one CLEC, Qwest communicated the system issue and the

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190 *See* Eschelon at 4-5. Eschelon also claims that the Qwest service managers "became unavailable while the issue remained unresolved." *See id.* Contrary to Eschelon's claims, however, two Qwest service managers communicated daily via email and phone with an Eschelon employee to find a suitable workaround while the issue was being worked out.

191 Based on February to May 2002 LSR volumes.

192 Investigating the root cause of this problem was time consuming because the specific error required several avenues of investigation. The single instance of this error condition did not indicate a systemic problem.

temporary work around to all CLECs via notification on July 2, 2002. This work around allowed for normal processing (the same as for electronically-submitted orders). Qwest corrected the system issue on July 10, 2002, and Qwest distributed a notification to all Wholesale customers to this effect on the same day.

5. Manual Handling Indicator

150. Eschelon claims that Qwest requires excessive use of the manual handling indicator in placing orders. [193] Specifically, Eschelon claims that "Qwest instructs CLECs to select manual handling and insert remarks as part of the process for placing an order." [194] In a limited number of circumstances, Qwest does instruct CLECs to select manual handling as an alternative to faxing these types of LSRs. Qwest distributed a communicator to the CLEC community on October 4, 2001, to clarify the situations where the manual handling indicator should be checked, [195] since Qwest was receiving many LSRs with the manual handling indicator marked unnecessarily.

151. In its comments, Eschelon cites two examples where the use of the manual handling indicator is required: (1) CLEC-to-CLEC migrations, and (2) issuing a change order on a newly converted account when the CSR has not yet been updated. [196] With regard to the first scenario, currently the

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193 *See Eschelon* at 7, n13.

194 *See id.* at 7.

195 *See* Attachment 5, Appendix O, Vol 2, Tabs 722-723.

196 *See id.* at 7, n13.

new local service provider does not have access to the Special Billing Number, Circuit Identification information or any other information relative to the loop that is converting to their switch. As a result, the CLEC must check the manual handling indicator in order to bypass IMA edits that would otherwise cause the LSR to be rejected for not supplying all the appropriate information about the underlying loop to be converted.

152. The second situation is limited to where a LSR has been recently completed, the CSR has not yet been up dated yet and the CLEC needs to issue a subsequent LSR. As described above in Section H(3) CSR Updates, the use of the manual handling indicator applies in very limited circumstances where the CLEC needs to make a change immediately following initial conversion. Use of this process and the manual handling indicator prevents delaying requests or resorting to manual submission of requests.

IV. PROVISIONING

A. Loss and Completion Reports

153. As stated in Qwest's initial declaration, Qwest does not issue Loss and Completion Reports in the Qwest Retail environment and designed these reports specifically for CLECs. Eschelon claims that these reports do not provide CLECs with the ability to identify which customers have left the CLEC for another carrier. Eschelon Comments at 17. This claim is specific to Eschelon and not Section 271 affecting. However, Qwest implemented a change to its Loss and Completion Reports on July 14, 2002 to provide CLECs with the identities of customers who have terminated service with them.

B. Unannounced Dispatches

154. Eschelon asserts that Qwest has apparently commenced a project to increase copper availability and the project is causing service disruptions during migration of existing customer lines to UNE-P and conversions of new customers to CLECs using UNE-P and Resale. Eschelon Comments at 7. Qwest does not have a specific facility project underway to increase copper availability. Qwest places copper facilities in its network based on demand forecasts for both Retail and Wholesale. When a facility project that places additional copper in the network infrastructure exceeds $100,000 in cost, Qwest places a notice on its website and provides an explanation of the nature and location of the project.

155. Eschelon further alleges that Qwest incorrectly dispatches technicians and assigns new cable and pair for UNE-P conversions and Resale orders that generally require no dispatch. Qwest records indicate that Eschelon has provided 5 examples of such "unannounced dispatches." Qwest research indicates no technician was dispatched as a result of UNE-P conversion or Resale order activity. Qwest research also indicates that Qwest did dispatch a technician on these orders. Analysis of the orders identified a process error that was causing Qwest facility assignment systems to select new cable and pair for UNE-P conversion orders leading to unnecessary dispatches for UNE-P conversion orders. A process modification placed into effect July 23, 2002 will eliminate these unnecessary dispatches.

V. MAINTENANCE & REPAIR

156. CLECs claim that (1) Qwest's rate of successful repairs is inadequate; and (2) Qwest does not maintain accurate repair records for CLECs. I address both of these issues below. In addition, Eschelon raises five other issues that are addressed separately below.

A. Rate of Successful Repairs

157. AT&T and WorldCom claim that Qwest's rate of successful repairs is inadequate. [197] Qwest addressed this issue in its initial application. [198] As stated there, Qwest adequately repaired over 92% of POTS Resale, UNE-P, and UNE-L circuits on the first attempt. [199] But, because Qwest's performance failed to meet KPMG's self-determined benchmark of 95%, KPMG issued Exception 3058. Qwest chose not to retest this exception because it believed that, under the circumstances, KPMG's calculated performance of 92% was at parity with retail and was adequate. Nevertheless, Qwest's analysis concluded that Qwest accurately repaired the inserted trouble at least 97.7% of the time during this part of the test.

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197 AT&T at 44, Finnegan/Connolly/Menezes Decl. at ¶¶208, 214-215; WorldCom at 16-17, Lichtenberg Decl. at ¶¶64-66.

198 *See* OSS Decl. at ¶¶476-478.

199 *See id.* at ¶476.

B. Accurate Repair Records

158. CLECs allege that Qwest does not maintain accurate repair records for CLECs. [200] This claim (along with E3055), was addressed in Qwest's initial application. [201] In the initial OSS Declaration, Qwest explained why its performance was satisfactory and described recent improvements implemented through additional training and ongoing field coding process audits. [202] An updated audit of Qwest trouble codes (through June 2002) shows continued aggregated performance on average of 95+%. [203]

C. Eschelon-Specific Claims

1. Authorization and Accuracy of Closing Tickets

159. Eschelon claims that Qwest sometimes closes trouble tickets without contacting Eschelon for authorization or with incorrect cause and disposition codes. [204] Qwest addressed the issue of incorrect cause and disposition codes above. [205] Contrary to Eschelon's comments, Qwest attempts to notify its customers and follows the same process for its Retail and Wholesale operations when closing a trouble ticket. To the extent Eschelon

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200 *See* AT&T Comments at 44, Finnegan/Connolly/Menezes Decl. at ¶¶210-213; Eschelon Comments at 15.

201 *See* OSS Decl. at ¶¶471-475.

202 *See id; see also id.* at Exhibit LN-OSS-29.

203 *See* Reply Exhibit LN-24 (Summary of Field Coding Process Audit – through June).

204 *See* Eschelon at 15.

205 *See supra,* Section IV.C.

has not received such notification, Qwest cannot address the particular reasons without further specifics. [206]

160. The process for customer notification is dependent on the type of service (designed or non-designed). But either way, Qwest attempts to notify the customer. For non-designed trouble tickets (including non-designed resale and UNE-P POTS), the technician that resolves the trouble also closes the ticket. The technician attempts to contact the customer when closing the ticket. If the customer cannot be reached, a voice mail message is left (if possible) and the ticket is closed. Customer notification is dependent on availability at the customer provided call back number. In addition, for trouble tickets opened through the electronic M&R interface (CEMR), notification is automatically sent (either through e-mail or fax) when the ticket is closed.

161. For designed services, which are generally more complex, Qwest uses a MCO to manage all designed service trouble tickets (both Wholesale and Retail), including trouble tickets for unbundled network elements. The MCO technician manages the closure of these trouble tickets, including attempting to contact the customer. If the CLEC is not available at the time of closure, the MCO technician will wait up to 24 hours after attempting to contact the customer to coordinate closure. If there is no answer, the MCO technician will leave voice mails with the contact person noted on the trouble report. The trouble ticket is placed in a "No Access"

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206 *See id.* Eschelon provides no such specifics. Its entire claim consists of

status while Qwest awaits the customer's response. The trouble ticket is closed if no response is received from the customer within 24 hours.

2. Repair Invoicing

162. Eschelon claims that it cannot obtain an invoice of applicable repair charges at the time repair work is completed, but rather must wait until Qwest sends the monthly Wholesale invoices. [207] Eschelon asserts this places them at a disadvantage in that it is not able to dispute such charges in a real time basis. [208] Qwest does, however, provide CLECs with a dispute process for repair charges. The opportunity to dispute repair charges is dependent on the type of service (either designed or non-designed). In either event, the dispute processes for repair charges are provided in substantially the same manner as those utilized by Qwest retail personnel.

163. For non-designed trouble tickets (including non-designed resale and UNE-P POTS), the technician that resolves the trouble closes the ticket as discussed above. [209] By using the CEMR electronic interface, however, CLECs may access a view of the same non-designed service repair charge information that is available to Qwest retail personnel. CEMR provides indication of the Trouble Isolation Charge for a specified trouble ticket. Should

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a mere three lines in its comments.

207 *See* Eschelon at 12-13.

208 *See id.*

209 *See supra,* Section IV.D.1.

CEMR review identify the need, CLECs may dispute the charge after it is billed with their billing representative.

164. For designed services, which are generally more complex, there are several opportunities to dispute repair charges before they appear on the CLEC bill. As discussed above, [210] an MCO technician manages the closure of these trouble tickets. When Qwest is discussing the resolution of designed services trouble tickets with the CLEC, the MCO technician will advise the CLEC of the nature of the charges that will be applied. If the CLEC disputes the resolution of the ticket at that time, the ticket will not be closed. Thus, CLECs are given the opportunity to dispute the charges at the time of closure.

165. Additionally, Qwest's process is to hold a designed services trouble ticket for two weeks after closure before sending the charges to billing. This provides the CLEC with another opportunity to dispute repair. Further, in the event that repair charges were quoted by an MCO technician in a previous trouble report that is less than two weeks old, and a subsequent trouble report finds the trouble to be in the Qwest network, the CLEC has a third opportunity to dispute the initial trouble ticket charge with the MCO technician working the subsequent trouble report.

166. Therefore, CLECs can dispute repair charges for designed services at ticket closure, any time up to two weeks after ticket closure, and after accepting repair charges (if a subsequent trouble finds a previously-billed

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210 *See id.*

trouble to have been incorrectly repaired or within the Qwest network). Finally, after the charges have been sent to billing, the CLEC can contact their Qwest billing representative to dispute any repair-related charges.

167. Finally, in response to an Eschelon CR, [211] Qwest is evaluating with the CLEC community through CMP whether a mechanism should be created to forward repair invoices to the CLECs for delivery to their end users. Qwest will present its response to this CR at the next CMP meeting, scheduled for August 21, 2002.

3. Pair Gain Testing

168. Eschelon asserts that Qwest will not accept a trouble ticket for loops provisioned on pair gain, such as Digital Loop Carrier, without receiving either test results or authorization to apply "Optional Testing Charges." [212] Eschelon claims it cannot "obtain accurate testing results" when Qwest provisions service over pair gain systems. [213]

169. Qwest's maintenance and repair process requires the CLEC to isolate trouble to the Qwest network before passing a trouble report to Qwest. This entails the CLEC dispatch a technician to the end user customer's premises and testing from the network demarcation point toward the customer and, failing to find the trouble in that direction, testing the circuit toward Qwest's side of the demarcation. In the scenario where the trouble is on a

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211 *See* Reply Exhibit LN-25 (Change Request CR-053002-1).

212 *See* Eschelon at 14-15.

213 *See* Eschelon at 14-15.

circuit that is provisioned on pair gain the CLEC should be able, using standardized, readily available test sets, to test the circuit between the customer premises demarcation and Qwest's pair gain system. CLECs can accurately test to this point.

170. If the CLEC provides information when it establishes a trouble ticket with Qwest that the trouble is on a circuit containing "Pair Gain" and provides the actual test results obtained from the technician dispatch to the customer premises, and the trouble is ultimately found to be in Qwest's network, no "Optional Testing Charge" will result.

171. If Eschelon identifies scenarios where it is charged "Optional Testing Charges" in error, it can dispute these charges through normal billing dispute channels starting with its billing representative. Additionally, should Eschelon experience refusal by Qwest to accept trouble reports when Pair Gain exists and test results are provided, Eschelon should escalate within the repair process for immediate resolution.

4. Branding and Customer Confusion

172. Eschelon asserts that Qwest technicians are providing Eschelon end user customers (in Arizona and Washington) with Qwest branded repair invoices (*Time and Materials Invoice*). [214] The *Time and Materials Invoice* contains the date, the customer's name and address, the reason for the visit, the technician's name, and any applicable repair charges.

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214 *See* Eschelon at 13.

173. Qwest's repair process states that Qwest personnel shall not leave *Time and Materials Invoices* with CLEC end user customers. Instances of non-compliance of this process by Qwest technicians should be reported to Qwest for corrective action. Qwest's records indicate this situation has occurred with a limited number (5) of Eschelon's end user customers between November 2001 and May 2002. Qwest has taken corrective actions to ensure that field technicians do not leave these invoices with CLEC end user customers in the future. There were no similar incidents with Eschelon end user customers in June 2002.

5. Untimeliness and Insufficient Information on Bills

174. Eschelon claims that Qwest provides untimely bills for maintenance charges and also provides insufficient information on those bills.[215] These claims are addressed below, in Section VI.

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215 *See* Eschelon at 14-15.

VI. BILLING

A. Wholesale Bill Accuracy, Completeness, and Timeliness

175. The FCC has held that a BOC must provide CLECs with nondiscriminatory access to the BOC's billing functions to satisfy Section 271. More specifically, a BOC must establish that it provides CLECs with (1) a complete, accurate, and timely DUF; and (2) complete, accurate, and timely Wholesale bills. [216]

176. BOCs do not have to provide a particular form of access to OSS. Indeed, the FCC has held that "compliance with industry standards is not a requirement of providing nondiscriminatory access to OSS functions," [217] and that adherence to OSS industry standards "is not a prerequisite." [218] Thus, a BOC can satisfy the requirement to provide CLECs with nondiscriminatory access to Wholesale bills in more than one way.

177. In the past, a BOC's ability to meet the FCC's standard has been assessed using the UNE-P bill. This is because UNE-P is among the most complex services ordered by CLECs. It is axiomatic that a BOC's ability to bill UNE-P on a complete, accurate and timely basis is representative of its billing capabilities as a whole. The numerous examples provided in this Reply Declaration therefore focus primarily on UNE-P bills.

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216 *See New Jersey 271 Order* at ¶121; *Pennsylvania 271 Order* at ¶13.

217 *See Louisiana 271 Order* at ¶137.

218 *See New York 271 Order* at ¶88.

1. Wholesale Bill Format Options

178. As explained in Qwest's initial OSS Declaration, CLECs can receive Wholesale bills in paper format, as well as in three electronic formats: (1) ASCII; (2) EDI; and (3) BOS for UNE-P. [219] Each of these formats is described briefly below.

179. ASCII: ASCII (American Standard Code for Information Interchange) is a standard way of representing characters and symbols in electronic form. ASCII was published in 1968 as ANSI (American National Standards Institute) X3.4. In 1972, it was adopted as an international standard as ISO-646-IRV (ISO - International Organization for Standardization). The current version is ANSI X3.4-1986 (R1997). The abstract of this version on the ANSI web site states:

> Details information interchange among information processing systems, communication systems, and associated equipment. Specifies a set of 128 characters (control characters and graphics characters such as letters, digits, and symbols) with their coded representation. This standard was first listed in the September 15, 1995 issue of Standards Action. It is being resubmitted due to substantive changes to the text. [220]

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219 *See* OSS Decl. at ¶ 498.

220 *See* Document Details, *available at* http://webstore.ansi.org/ansidocstore/product.asp?sku=ANSI+INCITS+4%2D1986+%28R1997%29.

Qwest's documentation on the use of its ASCII bill is available to the public. [221] The documentation contains a large amount of information useful for understanding the process and benefits of receiving an ASCII bill. It discusses how ASCII bills are sent to the CLEC, what steps CLECs should perform to import the data into their own software, and how the data is formatted. It also describes the layout of the various ASCII records, identifying the kind of data that is presented in each, and discusses some of the technical details of ASCII. Qwest's documentation also includes a "Frequently Asked Questions" section.

180. ASCII-formatted bills can be received by CLECs via Web access, on CD ROM, or on diskette [222] for all product and service types billed in CRIS, including Resale such as Centrex, PBX, and Private Line Service, and UNEs such as Unbundled Loops, Line Sharing, Sub-Loops, EELs, and UNE-P.

181. The overwhelming majority of CLECs ordering UNE-P from Qwest receive their Wholesale bills in ASCII format, along with a paper bill. For example, 21 of the 29 CLECs [223] ordering UNE-P in the five Application states receive their Wholesale bills in this format, with the remaining seven receiving paper only.

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221 *See* BillMate® Billing Diskette / CD ROM Customer Guide, *available at* http://www.qwest.com/largebusiness/products/downloads/BMDiskCustGuidecurrent.pdf. *See* Reply Exhibit CLD-26 (Excerpt of BillMate / CD ROM Customer Guide).

222 *See* OSS Decl. at ¶ 498.

223 The state-by-state breakdown is as follows: seven out of 11 CLEC in Colorado, four out of four CLECs in Idaho, two out of four CLECs is Iowa, and four out of five CLECS in each of Nebraska and North Dakota.

182. EDI: EDI (Electronic Data Interchange) is the computer-to-computer exchange of documents in a standard format. EDI uses the ANSI X.12 811 transaction set. The Telecommunications Industry Forum (TCIF), sponsored by the Alliance for Telecommunications Industry Solutions (ATIS), develops the telecommunications industry guidelines for use of EDI. The guidelines are documented in TCIF document TCIF-98-025, "TCIF EDI Billing Guidelines, Issue 9 ANSI ASC X12)". Qwest's EDI documentation is available to the public. [224] EDI bills are available for all CRIS-billed services. EDI format bills can be received via VAN, NDM, FTP or Web access. [225]

183. One CLEC ordering UNE-P has recently elected to receive its Wholesale bill in EDI format in the five Application states.

184. BOS: The CABS BOS© (Billing Output Specifications) provides companies with the generic detailed specifications to support the billing function for Interconnect and Access Billing Systems. The Telcordia Technologies Billing group maintains the specifications. The specifications are guidelines only. Each Exchange company makes the final decision whether to use any of the specifications. New versions of BOS are scheduled every 6 months. Each year, one version is scheduled to become effective March 1, and the second becomes effective September 1. No more than 2 major versions of BOS are valid at any time. Version releases should be implemented during the

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224 *See* BillMate® EDI, *available at* www.qwest.com/pcat/large_business/product/ 1,1354,540_4_8-6,00.html.

225 *See* OSS Decl. at ¶ 498.

three-month implementation window that begins on the version effective date. The CABS Billing Data Tape Differences List is the way providers communicate to their customers any deviation from the guidelines. Telcordia provides an industry standard template to use when notifying customers of these deviations.

185. The BOS Billing records contain sections matching the paper bill, *i.e.*, Balance Due, Current Charges, Payments, Adjustments, Usage, Circuit Detail, and Taxes. The electronic BOS CSR records are laid out in sections, *i.e.*, Account Information, Services & Features, and Taxes and Summaries. Both the BOS Billing and CSR record layouts are comprised of a record with 225 bytes. Using Telcordia's record layout definitions, CLECS can determine what data is contained in each field.

186. On April 19, 2002, Qwest notified CLECs that it would make available Wholesale UNE-P bills in BOS format with a target production date as of July 1, 2002. Currently, one CLEC – AT&T – has requested and received its UNE-P bills in a BOS format; three UNE-P bills were rendered in July 2002. Two other CLECs have expressed interest in receiving the BOS format for their UNE bills, and Qwest is currently working with these CLECs to determine what may be required for them to transition to the BOS format in the future.

187. Qwest works with those CLEC's interested in receiving CRIS bills in a BOS format by providing a test tape upon request from their SDC. The Qwest Process Specialist handling media processes will coordinate with the CLEC's IT department to make sure transmission of the test file is received

successfully. Then Qwest requests feedback from the CLEC and collaboratively works with the CLEC to resolve any questions or issues. WorldCom received a test file from Qwest on July 8, 2002. Vartech was sent a test tape as well on July 17, 2002.

188. To create the BOS format bill, Qwest converts the CRIS billing data into a BOS format and transmits it to the customer. The CLEC then reviews the Differences List provided by Qwest to guide its development efforts. [226] Qwest's offers BOS-formatted bills (for UNE-P) via NDM, Web access, diskette or BDT. [227]

189. In addition to its current offering of the BOS format bill, Qwest is working a CMP CR which requests that Loops be billed on a BOS format bill. Qwest will add Unbundled Loop Analog and Digital products to the framework in subsequent phases: Phase One is planned for October 26, 2002, for analog 2 wire loops; Phase Two is planned for December 31, 2002, for digital loops.

2. Wholesale Bill Content

190. ASCII-formatted bills contain the same data that paper bills contain at the summary account level and sub-account level. Thus, the ASCII and paper bills contain (1) the same key billing elements and summarization points as the paper bill; (2) matching dollar amounts; (3) enough information to permit a third party to recalculate the charges based on the information

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226 *See* Reply Exhibit CLD-27 (BOS Version 37 Differences List).

present; and (4) are in balance, meaning the sum of every charge or credit on both bills result in the stated total at the next highest level of detail. [228] BOS- and EDI-formatted bills, used in conjunction with electronic CSRs, contain similar information.

191. The same CRIS data source is used to create both the paper and electronic bills. Moreover, Qwest employs as an additional safeguard a mechanized process to ensure that the bill totals on paper and electronic bills are the same. [229] To the extent Qwest discovers an electronic bill containing dollar amount information that does not match the paper bill, the electronic bill is changed to match the paper bill before it is delivered to the CLEC. [230] Qwest plans to augment this process in September 2002.

192. As noted above, for each electronic format that Qwest provides – ASCII, EDI, and BOS – Qwest offers CLECs a variety of transmission methods. [231] Regardless of format or transmission method, telecommunications service charges on Qwest bills break down into three types: (1) Monthly Recurring Charges; (2) Non-recurring and Fractional

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227 *See* OSS Decl. at ¶ 498.

228 *See Pennsylvania 271 Order* at ¶¶20-21 & n.63. ASCII bills are used to validate current charges, and thus do not contain balances past due; however, this information is readily available on the first page of the paper bill. Notably, the FCC has held that the electronic and paper bill formats do not have to exactly mirror each other. *See id.* at ¶29.

229 *See id.* at ¶ 500.

230 *See id.* at ¶ 500 & n.706.

231 *Id.*

Charges (sometimes called "Other Charges & Credits," or "OCC"); and (3) Usage Charges. For each type, Qwest provides equivalent information on the electronic bill as is found on the paper bill.

193. A description of these charges, along with illustrations of how they appear on paper and BOS bills, was provided to the FCC in an ex parte filing on July 10, 2002. [232] For further illustration, an explanation of how these charges appear on paper and ASCII bills is attached to this Declaration. [233]

a. Monthly Recurring Charges

194. Every CRIS-generated Summary Bill, whether electronic or paper, contains a "Summary of Services" section that lists the total number of all the services billed in a given billing period per account number. Every billed USOC, regardless of sub account, is included here. This aggregation of information enables CLECs to validate at a summary level that their USOC quantities are correct.

195. To validate that Qwest is correctly billing monthly recurring charges, a CLEC would begin by comparing the USOC quantity in the Summary of Service section of the Summary Bill to the USOC quantity the CLEC expected to see in its own records. A match in the USOC quantity would

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232 Reply Exhibit LN/CLD-10 (Qwest July 10 Ex Parte on Billing, Bill Auditability, Manual Service Order Accuracy, Jeopardy Notices and Loop Qualification).

233 *See* Reply Exhibit CLD-28 (ASCII and Paper Format Bill Comparison).

indicate the bill's accuracy. If the USOC quantities did not match, the CLEC could mechanically look in the Itemized Service section of its sub-accounts and determine whether the service that was billed should in fact have been billed.

196. At the sub-account level, Qwest provides itemization of each monthly service billed for that particular sub-account. This section includes:

- A description of each service;
- The rate for each service;
- The quantity for each service; and
- The USOC code and working telephone number for each service (in the ASCII bill, as well as in electronic CSRs).

A CLEC can validate a particular sub-account by going to the "Monthly Services" section of that sub-account's page in the bill. The Itemized Service section provides a plain English description of each monthly service item billed for that sub-account and the rate for that service. This provides CLECs with the information they need to audit the monthly services billed for each sub-account.

b. Non-Recurring and Fractional Charges

197. Qwest's electronic bill formats provide fractional and non-recurring charges at a sub-account level. For ASCII and EDI formats, this information is provided in the "Service Additions and Changes" section. The BOS bill provides this information in the "Other Charges and Credits" section.

198. A side-by-side comparison of ASCII-, EDI-, and BOS-formatted bills demonstrates that the audit-affecting information is the same:[234]

- The service order number for the change;
- The purchase order number (PON) from the CLEC's LSR;
- The service dates of the activity;
- The involved USOCs and their descriptions; and
- The net amount of the charge for the service order.

199. The presence of these items enables CLECs to audit the charges and verify that they are being billed accurately. To validate that these charges are correct, the CLEC would match the service order or PON number to its service records. The CLEC then would confirm that the service dates and USOCs are correct, and could validate the net amount billed by comparing the amount billed to its expected results.

c. Usage Charges

200. The third major type of charges on a bill is usage charges. Qwest's ASCII, EDI, and BOS bill formats summarize categorized usage at a telephone number level. Providing usage charges at the telephone number level allows CLECs receiving ASCII-, EDI- or BOS-formatted bills to validate the usage against the DUF.

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[234] Qwest's CRIS bill format also provides the monthly rate associated with the USOCs that are added or removed with the order activity.

201. The local usage on Qwest's ASCII and EDI bill includes local and Shared Transport minutes. Qwest also provides call-by-call detail for all Qwest intraLATA toll calls and pay-per-use features, such as Last Call Return or Continuous Redial, that bill to the CLEC. Qwest provides this usage data to CLECs with the identical level of detail that Qwest provides to its Retail customers.

202. The BOS billing format provides summarized usage billing pursuant to industry guidelines. On the BOS bill, local switching and toll usage is summarized at the TN level and broken down into applicable billing categories.

3. Evidence of Completeness, Accuracy, and Timeliness

203. Qwest's initial OSS Declaration identified with particularity the manner in which Qwest's Wholesale bills meet the FCC's "complete, accurate and timely" standard. [235] Qwest's Wholesale bill timeliness, as measured by BI-2, has met the parity (by design) standard from January through June 2002, averaging 95% delivery within ten business days. [236] Further support regarding the completeness and accuracy of Qwest's Wholesale bills appears below.

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235 *See* OSS Decl. at ¶¶539-43.

236 *See id.* Tests 20 and 20.7 of KPMG's Third Party Test also confirms that timeliness of Qwest's Wholesale bills. *See id.* at 589, 592 (citing *Final Report* at 441-54, 457-80).

a. Third Party Test

204. KPMG's Third Party Test of Qwest's OSS established that Qwest's Wholesale bills are complete and accurate. Specifically, Test 20 evaluated Qwest's ability to accurately bill charges on the appropriate bill and Test 20.7 examined Qwest's operational processes in connection with bill production. [237] Qwest passed both of these tests without any "no satisfied" findings. [238]

b. Commercial Performance Results

205. Qwest's commercial performance results for BI-3A, which measures billing accuracy, and BI-4A, which measures bill completeness, further support a finding that Qwest's Wholesale bills are complete and accurate. Overall, Qwest's Wholesale results for both BI-3A and BI-4A in the five Application states has been strong, with Qwest meeting parity in the majority of cases. [239] When Qwest did not meet the parity standard, Qwest explained the circumstances surrounding the miss. But even when Qwest missed the standard, its performance consistently was above the 92nd percentile. [240]

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237 *See* OSS Decl. at ¶¶588, 591 (citing *Final Report* at 435, 455).

238 *See id.* at ¶¶589, 592 (citing *Final Report* at 441-54, 457-80).

239 *See id.* at ¶¶545-54, 556-68. *See also* Section I, *infra.*

240 *See id.*

c. Disputed Dollar Amounts

206. Qwest's receipt of disputes from CLECs supports the fact that Qwest's bills are auditable. In the five Application states between January through May 2002, disputes on UNE bills totaled nearly $149,000 on a billed base of nearly $52,000,000, resulting in 0.3% disputed charges. [241]

d. Auditability

207. The FCC has elaborated on the requirement that a BOC provide "complete, accurate and timely" Wholesale bills by stating that such bills must be "readable, auditable, and accurate." [242] Satisfying the bill auditability requirement requires that bill information can be easily transferred to a computer spreadsheet, computer software, or other electronic system that allows CLECs to mechanically manipulate and audit the data. [243] Qwest electronic billing options meet the requirement.

208. As an additional matter, it is worth noting that, during the three years of Section 271 Checklist workshops and the ROC Third Party Test, no CLEC questioned the auditability of Qwest's Wholesale bills until just days before Qwest filed this Application. The only time the issue of bill auditability came up even remotely was when CLECs asked KPMG whether it had verified whether CLEC bills were auditable, to which Mike Weeks responded: "I think it

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241 A look at our 14 state UNE disputes shows more than $1,140,000 disputed on a base of $121,000,000 billed with 0.94% of bills in dispute.

242 *See Pennsylvania 271 Order* at ¶22.

243 *See id.* at ¶17, n.51.

speaks for itself that, in fact we did audit the bills, so one could infer that they are auditable. [244] Other than this question, auditablity was never raised as an issue.

i. Commercially Available Software

209. Qwest can – and has – provided evidence that CLECs can audit their Wholesale ASCII bills. [245] As noted above, the data provided in ASCII-formatted bills can be – and are – easily downloaded by CLECs into commercially available software for viewing and analysis. For example, CLECs use Microsoft Excel or Access, commercially available spreadsheet or database programs, to evaluate the accuracy of their ASCII-formatted bills. To the extent a CLEC's bill contains too many lines such that using Microsoft Excel is deemed not feasible, CLECs may request additional segmentation of the sub-accounts associated with each summary bill, alleviating that concern. Also, Microsoft Access and other commercially available software packages do not contain such line limits.

210. The following steps will allow the CLEC to prepare the ASCII file for further validation in Microsoft Access: [246]

1. First, the CLEC would extract the billing information from the file.

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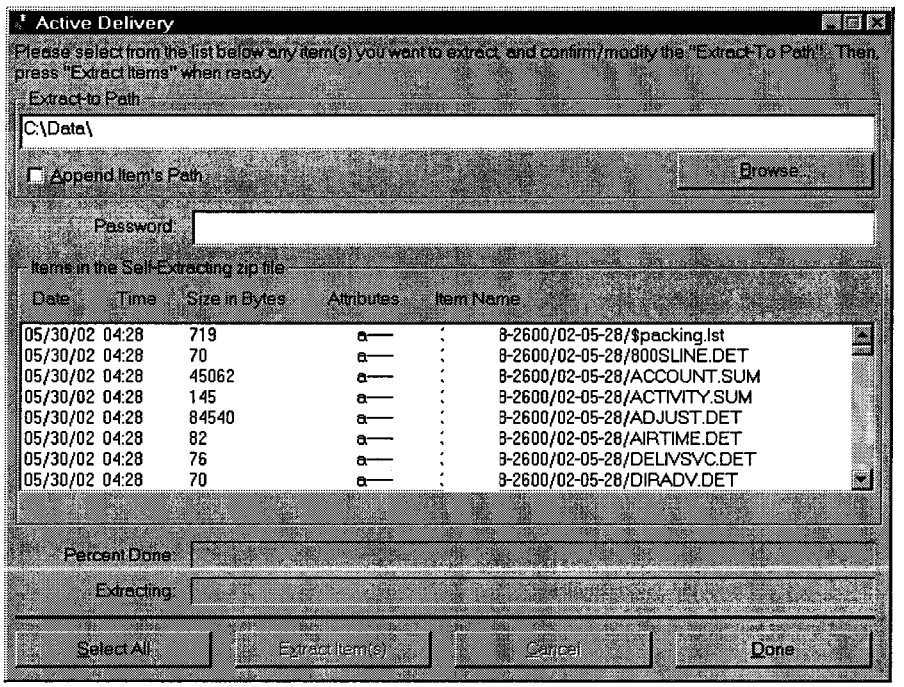
244 Colorado OSS Hearing June 10, 2002 at 168, lines 19-22.

245 *See* Qwest July 23 Ex Parte.

246 *See* Qwest July 18, 2002 Ex Parte (describing the step-by-step process a CLEC would use to audit an ASCII-formatted bill on a spreadsheet like Microsoft Excel).

- Qwest sends the ASCII bill file as an "executable" (*.exe) type file. The CLEC should execute/run the file.

- Once the file has run, the Windows dialog screen shown below will automatically appear on the user's PC (assuming a Windows operating system is being used).



- This Windows dialog screen allows CLECs to extract individual sections of each summary bill for future use. To extract the "Monthly Services Detail" section of a given summary bill (for example), the CLEC would select the item entitled "MONSERV.DET" (for the desired summary account number), select the desired location to extract the file to, and then click on "Extract Item(s)".

- The CLEC would then repeat the previous step until all of the desired bill files have been extracted.

- Once all files have been extracted, the CLEC clicks "Done" and the dialog screen will close.

2. Second, the CLEC must change the .det file to a .txt file.

- The CLEC should right click on the lower left hand corner button marked 'Start'.
- Then the CLEC would click on 'Explore'.
- Next, the CLEC would select the folder to which the bill files were saved.
- After that, the CLEC would click once on the file to change, for example, "Monserve.det."
- The CLEC would click on the "File" button in the upper left hand corner and select "Rename."
- Then the CLEC would retype the name to reflect "Monserve.txt" and hit enter.
- Finally, the CLEC would reply 'Yes' to the pop up screen, changing the file to a .txt file that could be imported into MS Access.

3. Third, the CLEC would import the billing information into Microsoft Access. As with any type of repetitive activity within Microsoft Access, developing a macro can simplify the steps involved and ensure the same sequence of events and standardization of fields and field names.

    - The first step would be to create an Import Macro by defining an IMPORT SPECIFICATION. To complete this, the CLEC would perform the following steps:
    - Launch Microsoft Access,
    - Click on the "Tables" tab,
    - Click on the "NEW" button,
    - Click on the "IMPORT TABLE" option in the text box,
    - Click on the "OK" button
    - Locate the text file you wish to import,
    - Click on the file name to highlight file name,
    - Click on the "IMPORT" button,

- With the beginning of the file appearing in a new window, click the radio button for Delimited file,
- Click on the "NEXT" button,
- Click the radio button for the type of delimiter used in this file, which is the comma on the ASCII files,
- Set the Check box for "First Row Contains Column Headings",
- Click on the "NEXT" button,
- Click the radio button for "IN A NEW TABLE"
- Click on the "NEXT" button,
- For each column, click on the column and fill in FIELD NAME, FIELD TYPE, INDEX, or Do not import,
- Click on the "NEXT" button after all columns have been defined,
- Click the radio button for "LET ACCESS ADD PRIMARY KEY,"
- Click on the "NEXT" button,
- Click on the "ADVANCED" button,
- Click on the "SAVE AS" button,
- Type in a User Friendly Specification Name,
- Click on the "OK" button to save the new specification, and
- Click on the "OK" button again to complete the specification definition.
- Now the CLEC is ready to import the individual file by clicking on the "Finish" button. Once the Import Specification is defined, the CLEC can build an Import Macro. The import Macro will allow the CLEC to load files into a table at the click of the mouse. Below are the necessary steps:

- Click on the "Macros" tab,
- Click on the "NEW" button,
- In the column titled "Action," select the action "TransferText,"
- Set the "Transfer Type" to "Import Delimited,"
- Set the "Specification Name" to the name of the specification created during the previous steps,
- Set the "Table Name" to any user friendly Table Name,
- Set the "File Name" to the exact location, including any network path information, and name of the text file to be imported,
- In the Column titled "Action" in the row below "Transfer Text," select the action "RunSQL,"
- Type *DELETE * FROM TableName WHERE BAN ='#1'* in the SQL Statement field,
- The Use Transaction should be *Yes,* and finally
- Save the Macro and it is ready to be used.

211. It is recommended that a new Import Specification and Macro be created for each unique bill section and/or DUF layout to be imported into Access. Once created, the CLEC can simply run the desired Macro to import files for further analysis.

ii. Vendors

212. CLECs also can – and have – purchased or licensed bill-auditing software for their own use or outsourced their bill analysis and auditing functions to commercial vendors that specialize in this function. These vendors include the following:

- TEOCO Corp. – Teoco has a program – BillTrak Pro – currently used by companies such as ICG Communications, XO Communications, and Allegiance. [247]

- broad:margin [248] is a company that provides both software and outsource validation services. It has 10 –

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[247] TEOCO states that

> "BillTrak Pro is the total invoice and cost management solution. Our system enables you to improve your network cost management process, so you can save 6-8% in annual network costs. Now you can easily process your CABS, SECAB, EDI 811 and proprietary invoices using BillTrak Pro, verify charges against your internal data, and compare these costs by interfacing with LERG, NECA #4 and CCMI's TelView Plus rate database."

See www.teoco.com/tts/btp.htm.

[248] broad:margin indicates that its Total Service Resale & UNE-P Reconciliation Practice has helped competitive carriers realize 10-30 percent improvement in their margins.

> The Total Service Resale & UNE-P Reconciliation Practice area uses ILEC cost data to perform revenue assurance assessments, cost audits, and rate audits. By enabling competitive carriers to compare ILEC inventories with their own billing system, revenue leakage areas are identified and resolved. Cost audits identify ILEC overcharges while rate audits can yield opportunities for rate increases and cost reductions.

See www.broadmargin.com/resale.html. broad:margin also issues licenses for the software employed in our service bureau, BillTamer™ and NetTamer™.

> BillTamer™ is a powerful cost management system that automatically processes, validates, and manages telecom access bills. It audits and analyzes complex inter-carrier bills, enabling competitive carriers to reduce these expenses.

See id.

15 CLECs purchasing UNE-P that use its service. Today Qwest receives disputes from broad:margin on behalf of at least one CLEC.

- CHR Solutions. [249] CHR Solutions has had 20 – 30 CLECs use its service.
- Murphy Software Consulting, Inc. [250]
- HTL Telemanagement Ltd. [251]

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249 CHR indicates that it "provides services designed to ensure that your company is receiving all possible revenues. This includes:

> CLEC – Resale Audit;
>
> CLEC – Facilities Based/UNE-P audit;
>
> Interconnection Agreement Billings;
>
> Carrier Access Billing Training and Implementation; [and]
>
> Carrier Access Billing Audit.

See www.chrsolutions.com/comp/comp.htm.

250 Murphy Software Consulting offers to do the following:

> Read your local resale vendor's detailed electronic invoice. Find and recover vendor overcharges. Validate your own customer revenue. Organize information, analyze profits, and create financial reports."

See www.localaudit.com/Eliminate_Overcharges/eliminate_overcharges.html

251 HTL Telemanagement describes its NetBill software as follows:

> NetBill loads electronic CABs bills and compare and validate CABS billed usage and inventory data. NetBill automatically takes your CABS data and stores this information into a historical database for easy to extract reporting. Use NetBill to build your circuit inventory including Channel Facility Assignment trees, making it easier to compare your high bandwidth multiplexed circuits with your current provisioning system. Estimates of the maximum UNE-P charges that should be expected and creation of usage summaries to perform

- TPC. [252]

iii. Billing Disputes Received

213. That CLECs have submitted billing disputes to Qwest in connection with their UNE-P bills is proof positive that CLECs can – and are – able to load, read and audit their ASCII bills. [253] The majority of the CLEC disputes Qwest has received fall into two main categories: (1) charging the wrong rate, or (2) charging for a USOC not installed. Qwest has attached as exhibits to this Declaration examples of CLEC billing disputes for bills received

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comparisons that will identify instances of over billing."

See www.htlt.com/products/netplan/netbill.htm.

252 TPC offers the following:

> "The LSP Ordering System is the featured product. Our install base is currently 28 pre-paid CLECs in eleven states and growing every day. By far the most popular back-end solution for CLECs! The LSP Ordering system is configured to process orders for Southwestern Bell, Bell South, Pacific Bell, Verizon (Bell Atlantic and GTE), Qwest, Sprint, and Alltel. We are adding more ILECs all the time! Comparing the ILEC's bill to your records can be costly and time consuming. Parity allows our LSP Ordering System customers to achieve bill reconciliation in minutes. Simply drop the CD from the ILEC into your CD-ROM drive and within minutes, a comprehensive detailed report is generated. Discrepancies and exceptions are highlighted and formatted so reclamation can begin immediately. We even provide standard report formatting to send directly to the ILEC for back-up documentation."

See http://theprogramcompany.com/products.htm.

in ASCII format, downloaded into Microsoft Excel spreadsheets and provided to Qwest to substantiate their disputes.

- CLEC 1: This CLEC is disputing certain UNE-P charges totaling $978.51. [254]
- CLEC 2: This CLEC is also disputing certain UNE-P charges totaling $67.06. [255]
- CLEC 3: This CLEC is disputing two different UNE-P bills in the amounts of $613.14 and $1657.66, respectively. [256]
- CLEC 4: This CLEC submitted disputes for a number of different UNE-P accounts totaling $12,229.37. These disputes include claims for all states which this CLEC serves in the Qwest territory. [257]
- CLEC 5: This is a dispute from a reseller on Directory Assistance charges it felt were in error totaling $153.32. [258]

iv. CLEC Testimonials

214. CLECs themselves indicate that Qwest's bills provide sufficient information to support bill auditing. [259] For example, broad:margin stated in a July 26, 2002, e-mail to Qwest that it has successfully been able to audit and validate bills of Global Crossing, and to dispute any such bills when

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253 *See* Reply Exhibit CLD-28 (Qwest July 25 Ex Parte on Bill Auditability)

254 *See id.*

255 *See id.*

256 *See id.* (Page three of the five-page CLEC 3 dispute filed in the Ex Parte was for a Resale account which was subsequently converted to UNE-P) (CLECs 1, 2 and 3).

257 *See* Reply Exhibit CLD-30 (CLEC 4 Dispute).

258 *See* Reply Exhibit CLD-31 (CLEC 5 Dispute).

259 *See* Reply Exhibit CLD-32 (CLEC Testimonials).

necessary. [260] An e-mail from Integra Telecom explained that it audits its UNE bills but needed additional BANs. Qwest immediately responded and will make the additional BANs available to Integra Telecom on August 1, 2002. [261] Furthermore, Ionex confirmed that it audits its bills using its own audit program. [262]

v. Additional Information Available to CLECs

215. Each CLEC has a specific billing SDC assigned to it who is familiar with the CLEC account and the products and services the CLEC uses. The SDC acts as a CLEC's single point of contact for billing questions and claims. Qwest provides billing overview information to CLECs on Qwest's website. [263] Qwest also provides CLECs with considerable information regarding their bills and offers a toll-free number for electronic bill-related question. [264] Finally, Qwest provides a web-based class, Introduction to

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260 *Id.*

261 *Id.*

262 *Id.*

263 *See* Billing – Customer Records and Information System (CRIS) – V10.0, *available at* www.qwest.com/wholesale/clecs/cris.html; Billing – Integrated Access Billing System (IABS) – V3.0, *available at* www.qwest.com/wholesale/clecs/iabs. html; Billing – Billing and Receivable Tracking (BART) – V2.0, *available at* www.qwest.com/wholesale/clecs/bart.htlm.

264 *See* BillMate® Billing Diskette / CD ROM Customer Guide, *available at* www.qwest.com/largebusiness/products/downloads/BMDiskCustGuidecurrent.pdf; *See* Reply Exhibit CLD-26 (Excerpt of BillMate / CD ROM Customer Guide); BillMate® EDI, *available at* www.qwest.com/pcat/large_business/product/ 1,1354,540_4_8-6,00.html.

Service Requests and Billing for CLECs, to support CLECs and their billing questions. [265]

216. To Qwest's knowledge, CLEC's have asked specific questions about their Wholesale bills, but no CLEC has sought specialized training for auditing Wholesale bills. Qwest remains committed to providing CLECs with the information they need to read, load and audit their bills. In sum, Qwest is committed to provide the fullest level of billing support needed by CLECs.

4. Bill Dispute Policy

217. Qwest's bill dispute policies and procedures ensure that CLECs can easily inquire about the services and charges found on the Wholesale bill. In fact, Qwest's billing dispute procedures specifically are designed to reduce the burden on CLECs. [266] Qwest's procedures permit CLECs to file disputes from any bill, regardless of format, with only a minimum of information, do not currently assess late payment charges, and usually resolve disputes within 30 days.

218. Qwest adheres to a detailed set of instructions for resolving CLEC disputes that SDCs use for reference. [267] In addition, Qwest provides

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265 *See* Introduction to Service Requests & Billing for CLECs, *available at* www.qwest.com/wholesale/training/tsc.html.

266 *See Pennsylvania 271 Order* at ¶40.

267 *See* Reply Exhibit CLD-33 (Disputes-Wholesale).

CLECs themselves with considerable information regarding their bills and offers a toll-free number for bill-related questions. [268]

219. To facilitate CLECs ability to audit bills, dispute charges, and get timely resolution, Qwest has in place a number of CLEC-friendly policies and procedures. First, Qwest acknowledges and investigates billing disputes based on any kind of formatted bill that Qwest provides. And as described above, CLECs can, and indeed are, submitting billing disputes on ASCII-formatted bills. Verizon took a slightly different approach, by permitting its CLECs to designate the BOS BDT bill as the bill of record, but with the same effect of permitting CLECs to initiate disputes on its two bill offerings. [269] Qwest, by allowing claims to be submitted based on any of its bills, alleviates any concern that a CLEC may have about selecting either the paper or EDI format as the bill of record. [270]

220. Second, Qwest neither requires end-user level detail to initiate a billing dispute claim of a systemic nature nor requires the use of a particular form to submit disputes. Qwest will acknowledge any claim as long as the CLEC provides a minimal amount of information to investigate the claim. But Qwest does request that CLECs submit all disputes in writing to

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268 *See* BillMate® Billing Diskette / CD ROM Customer Guide, *available at* www.qwest.com/largebusiness/products/downloads/BMDiskCustGuidecurrent.pdf. *See* Reply Exhibit CLD-26 (Excerpt of BillMate / CD ROM Customer Guide).

269 *See Pennsylvania 271 Order* at 21.

avoid any misunderstanding as to the nature and scope of the dispute. Such minimal information includes the CLEC Name, email address, contact name, Billing Account Number, and a brief description of the dispute. [271] Qwest offers CLECs a billing dispute template which CLECs can also use to initiate billing disputes. Verizon also had a streamlined process to resolve billing disputes, one the FCC found to minimize the burden on CLECs. [272] Qwest's process is no different.

221. Once Qwest receives a dispute, it verifies the content of the dispute and sends an acknowledgment of receipt to the CLEC within two business days. [273] If Qwest receives a dispute with incomplete information, Qwest notifies the CLEC and works with it to get additional information to allow the SDC to understand the nature of the dispute so that Qwest may begin its investigation of the claim. Qwest's goal is to resolve all disputes within 30 calendar days. Qwest is targeting its performance on these metrics at a 95% success rate [274] and makes every effort to complete the investigation as quickly and efficiently as possible. Occasionally, if a dispute involves multiple departments or other complicated factors, Qwest will negotiate an

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270 *See Pennsylvania 271 Order* at 21 & n.71 (describing that CLECs could dispute charges only from the Verizon bill of record).

271 *See* Billing – Customer Records and Information System (CRIS) – V10.0, *available at* www.qwest.com/wholesale/clecs/cris.html

272 *See Pennsylvania 271 Order* at ¶40.

273 *See* OSS Decl. at ¶497.

274 *See id.*

extended time frame in which to resolve the dispute while communicating the status of the dispute to the CLEC on a regular basis. An updated status may be provided to the CLEC by phone or via email.

222. Qwest's procedures state that SDCs should "always be aware of the customers' viewpoint, always listen to the CLEC's concerns and make every effort to establish and maintain a good business relationship". [275] If Qwest's investigation results in a denial of the CLEC's claim, Qwest always completely and clearly responds in writing how the conclusion was reached. Qwest also has a dispute escalation process to follow if there is not a mutually agreeable resolution. If a billing adjustment is required as part of the resolution, the SDC will enter the adjustment into the billing system and notify the customer in a resolution letter. If a CLEC has made payment for the charges in dispute, Qwest will issue a credit, including interest, for the dispute if resolved in the CLEC's favor. However, during the pendancy of the investigation, Qwest does not require CLECs to pay the disputed amount.

223. Furthermore, Qwest is fair in its administration of the CLECs "Pay-By Date." Should Qwest not render a bill within the ten-day period, Qwest extends the date on which CLECs should pay their bill by the same length of time Qwest needed to deliver the bill. Verizon enacted similar

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275 *See* Reply Exhibit CLD-32 (Disputes-Wholesale).

measures to streamline its bill dispute process, which the FCC found compelling. [276]

224. That Qwest's billing dispute processes are so accommodating demonstrates that Qwest provides CLECs a meaningful opportunity to compete. Of note, if a CLEC is late in its bill payment, since January 2002, Qwest has not charged CLECs any late payment charges. In most cases, Qwest is contractually authorized through the CLEC's interconnection agreement to assess fees to a CLEC that does not pay a bill on time. Because these charges and the circumstances in which they apply vary, enforcing late payment charges requires administrative resources and billing function augmentations currently unavailable. Rather than allocate finite expert resources to implement the necessary billing function changes to accurately assess late payment charges, Qwest dedicated its resources to billing functions that accurately and timely complete bills. Qwest has no plans to charge late payment charges in 2002 and Qwest does not have a date certain by which it plans to begin charging such fees. When Qwest decides to reinstate the assessment of late payment charges, Qwest will provide all CLECs with ample notice pursuant to the CMP guidelines.

225. Verizon did not charge late payment fees during the time in which its BOS BDT bill was going through major revisions, something the FCC noted in evaluating Verizon's continuing commitment to providing

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276 *See id.* at ¶40.

nondiscriminatory access to its billing functions. [277] Because Qwest is also not assessing late payment charges, the FCC similarly can take comfort in Qwest's intent to remain dedicated to providing CLECs with a meaningful opportunity to compete.

226. Taken together, Qwest has made significant resources available to support CLECs and eliminated any barriers to bill auditability and bill dispute claims. Qwest is committed to continuing to address CLEC concerns and needs regarding bills, as seen by the CRs that Qwest currently has under way. [278] In fact, Qwest has developed a PID that would measure the timeliness with which Qwest acknowledges and resolves disputes. Qwest will submit the proposed PID to Long Term PID Administration. While the details of the PID are being worked out, Qwest will voluntarily report its results with results to be reported first in August 2002. [279]

5. Billing Change Requests

227. Billing CRs are evaluated according to the process defined in the CMP Redesign discussions. Either Qwest or a CLEC may introduce billing CRs to CMP. If a CLEC introduces a CR, Qwest holds a clarification discussion with that CLEC to ensure that Qwest completely understands what the CLEC is asking for in the CR. The CLEC then presents the CR to the CMP forum at the next available monthly systems CMP meeting. Qwest determines a Level Of

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277 *See Pennsylvania 271 Order* at ¶41.

278 *See* Reply Exhibit CLD-34 (CMP Billing Change Requests).

279 *See* Reply Exhibit CLD-35 (Draft PID BI-5).

Effort ("LOE") and presents the Qwest Acceptance or Denial Response at a systems CMP meeting. If the Billing CR is accepted, Qwest moves forward with scheduling the CR into the next available billing release based on the complexities and size of the CR. If Qwest denies a CMP request, the originating CLEC has the right to escalate that denial. This process includes formally submitting the dispute via a form located at Qwest's website to receive a binding position from Qwest. [280] In case of an impasse, the governing document for Qwest's Change Management Process further defines a dispute resolution process that can include arbitration. [281]

228. Qwest updates the CR status at the CMP monthly meeting and tracks the progress of the CR until implemented. After implementation, the CR enters a period of CLEC testing, and based on the successful completion of the CLEC test period, the Billing CR will be deemed completed and will be closed.

B. Daily Usage File

229. To evaluate the accuracy and completeness of the DUF, KPMG conducted a series of tests lasting approximately one to three weeks in duration. The first two tests were not initiated due to test bed problems. Once those test problems were resolved, a total of three region wide DUF tests

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280 *See* Master Red-Lined CLEC-Qwest CMP Re-design Framework Interim Draft - Revised 7-23-02, *available at* qwest.com/wholesale/cmp/whatiscmp.html.

281 *See id.*

covering Qwest's were conducted. An additional test evaluated the DUF for specific call scenarios in the Central region alone.

230. After the first complete DUF test in June 2001, KPMG issued observations and exceptions, which Qwest responded to by implementing system fixes and interim processes. These fixes include creating a Pending Order File ("POF"), work which Qwest already had begun during the test, to ensure usage is sent to the correct CLEC after a TN changes from one LEC to another as well as to eliminate duplicate records. [282]

231. Following KPMG's October test, Qwest further enhanced its billing systems by modifying the POF and implementing other system-wide fixes. Qwest passed KPMG's January 2002 test in its Eastern and Western regions. [283] Qwest made additional minor changes to its billing systems to correct the few remaining issues in the Central region and passed KPMG's last test in March 2002. In many cases, the changes Qwest implemented ensured that even the most rare types of calls would be included on the DUF. For example, operated assisted local measured service records were involved for many of the changes, which only accounts for 0.002% of all calls made in on

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282 *See* Reply Exhibit LN-36 (Summary of DUF Test History).

283 In Eastern, Qwest passed the test criteria relating to DUF completeness but a subsequent test in March 2002 was needed to confirm the accurate formatting of records for operator-assisted local measured service calls.

the Qwest network on an typical day. KPMG concluded that Qwest provides CLECs with an accurate and complete DUF. [284]

232. AT&T nevertheless attempts to disparage Qwest's capabilities by claiming that Qwest's DUF is lacking because Qwest passed KPMG's DUF test only "on the sixth try." [285] AT&T's argument is wrong on two counts. First, it did not take Qwest six attempts to pass the DUF test. Rather, as noted above, KPMG conducted three full tests to evaluate the DUF and an additional test to evaluate the Central region. [286] The initial two tests were canceled because of test bed problems. [287] Thus, the number of system-wide DUF tests that KPMG actually executed is closer to three.

233. Regardless, KPMG's test was a military-style test that, by definition, required retesting to ensure that Qwest's systems are functional. This approach was no different than the OSS tests conducted for all the other BOCs that have satisfied Section 271. The FCC rejected an identical claim made by AT&T almost one year ago in the context of another Section 271 proceeding. "Contrary to AT&T's argument," the FCC stated, "the series of fixes to Verizon's wholesale billing system prior to its application does not

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284 *See Final Report* at 413-18.

285 *See* AT&T Comments at 45, Finnegan/Connolly/Menezes Decl. at ¶219.

286 *See* Reply Exhibit LN-36 (Summary of DUF Test History).

287 *See id.*

demonstrate that Verizon's Wholesale billing system was inadequate at the time it filed its application." [288]

234. Qwest's willingness to address all DUF-related issues raised by KPMG through retesting should be applauded, not criticized. The FCC reached this conclusion in the Pennsylvania 271 proceeding when it held that "the repeated need for Verizon to correct its billing system during KPMG's testing does not diminish Verizon's credibility, but rather helps demonstrate Verizon's commitment to correcting systemic problems in its billing systems." [289] Viewed in any light, AT&T's claim is without merit.

235. AT&T's attempt to discredit Qwest's DUF with anecdotal evidence also fails. For instance, AT&T claims that when it commenced local exchange service using UNE-P in Colorado, Arizona and Washington last year, Qwest did not provide it with any ADUFs, which transmits access records. [290] But, by its own admission, AT&T did start receiving these records in April 2002, prior to the filing of this application. [291] In fact, Qwest transmitted access records to AT&T since they first entered the market last year. Qwest located hundreds of thousands of access records when investigating AT&T's claim.

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288 *See Pennsylvania 271 Order* at ¶ 30 n.113.

289 *Id.* at ¶ 33, n.123.

290 *See* AT&T Comments, Finnegan/Connolly/Menezes Declaration at ¶ 222.

291 *See id.*

236. AT&T makes similar claims using anecdotal evidence from its UNE-P trial in Minnesota. [292] First, the alleged missing DUF records occurred before Qwest implemented system-wide fixes to the DUF. In fact, all of AT&T's results pre-date KPMG's Third Party Test, which concluded that Qwest's DUF is complete and accurate. The evidence AT&T is using to challenge the DUF, therefore, is stale and irrelevant given the subsequent system fixes to the DUF.

C. Notice of Rate Updates

237. Eschelon raises concerns regarding inadequate notice of rate correction. However, as of January 2002, Qwest provides advance notification to CLECs before implementing rate corrections. [293] Qwest sends these notifications in a Microsoft Excel spreadsheet, which enables CLECs to manipulate the data against their own billing records. CLECs with questions regarding a notification for a rate change can call their Qwest Billing SDCs.

D. CLEC-Specific Billing Claims

238. Eschelon claims that Qwest provides untimely billing for maintenance charges and also provides insufficient information on that billing. [294] As an initial matter, less than 0.1% of Qwest's Wholesale billing is associated with M&R charges. In response to the first claim of untimely billing

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292 *See id.* at ¶224.

293 *See* Billing – Customer Records and Information System (CRIS) – V10.0, *available at* www.qwest.com/wholesale/clecs/cris.html.

294 *See* Eschelon Comments at 14-15.

of M&R charges, however, Qwest enhanced its process in February 2002 so that 85% of the billing for maintenance charges is applied automatically when the notification is received at ticket closure for non-designed services or, for designed services, after the two-week quality assurance process described above, improving the speed with which billing is applied. The remaining volume is handled with an expectation of in-today/out-today processing. Some delay can be experienced on designed services because of the two-week quality assurance interval. Finally, bills are not issued on maintenance charges that are over 45 days old.

239. Eschelon also contends that Qwest provides insufficient information regarding maintenance charges on its bills. [295] Each bill is detailed at the sub-account level, as opposed to a summary level, so the CLEC can relate specific charges to a specific end-user account. For example, there is never more than one unbundled loop per sub-account, so it's obvious to which loop the charges apply. Further, in response to CLEC concerns, Qwest implemented process modifications in March 2002 to allow the CLEC to relate more easily the charges on the bill to a specific trouble report. The previous bill displayed the service order written to apply the M&R charges rather than the M&R work that was performed. Since March 2002, the bill displays the date the M&R charge was incurred, not the date the charge was added to the

295 *See id.*

bill, so the CLEC can match the charge to a specific trouble ticket and can more easily audit these charges on its bill.

240. Eschelon proposed a CR (PC053002-1) [296] requesting that Qwest develop "a process to allow CLECs to dispute miscellaneous [non-designed] repair charges before Qwest bills them." Qwest responded to this request at the July 17 CMP meeting that it felt the current designed services process (described above in Section IV(D)(1)) meets this request and that Qwest will continue to investigate options for the non-designed process. Qwest will provide additional detail around the designed process and provide a response regarding the non-designed process at the August 21 CMP meeting.

241. Eschelon also makes numerous claims regarding inaccuracies in its bills. [297] Qwest's investigation of Eschelon's claim, however, indicates that most are not related to system-wide defects in Qwest's billing functions. Furthermore, many of Eschelon's listed claims involve insignificant dollar amounts. In fact, the total dollar amounts in dispute constitute 0.98% of Eschelon's total billed charges for May 2002 in Colorado. Lastly, Eschelon filed disputes for which Qwest sustained the charges because they were properly included on Eschelon's bill. For those disputes that remain open, preliminary investigation suggests that many of these disputes will be resolved in Qwest's favor.

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296 *See* CR PC-053002-1, which is attached as Reply Exhibit LN-25.

297 Eschelon Comments at 23.

242. Eschelon raises similar concerns arising out of billing in Minnesota. But Minnesota is not among the states at issue in this proceeding and not relevant to Qwest's application for in-region, interLATA service. In summary, the issues Eschelon raised are not Section 271-affecting.

VII. TECHNICAL ASSISTANCE

A. Commercial Data on the Number of CLECs Successfully Testing in SATE is Compelling.

243. As discussed in the Application and in the OSS Declaration, the commercial data on the number of CLECs going into production through successful interface testing is strong evidence of the adequacy of Qwest's test environments – both SATE and Interoperability. [298] As the Commission has stated on numerous occasions, "actual commercial usage [is] the most probative evidence that a BOC is providing nondiscriminatory access to its OSS." [299]

244. With its Application, Qwest filed data regarding the number of CLECs testing in SATE and in the Interoperability environment as of May 1, 2002. As of May 1, five individual CLECs and five others through a service bureau had gone into production based successful testing in SATE. [300] Qwest subsequently provided data in the record showing what those numbers were as of June 1, 2002 (12 days before filing the Application). As of June 1, 2002, a total of 16 CLECs had successfully tested and gone into production through SATE (including the five through a service bureau). [301]

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298 Application at 137; OSS Decl. at ¶¶739-740. *See, e.g., Texas 271 Order* at ¶134.

299 *Texas 271 Order* at ¶102; *New Jersey 271 Order* at App. C, ¶31.

300 OSS Decl. at ¶740; Confidential Exhibit LN-OSS-61.

301 *See* Qwest July 15 Ex Parte on Confidential EDI Testing Data.

245. The following table provides more current details (as of July 9, 2002) for CLECs who are in production and have used one or both of the Qwest IMA-EDI test environments. The details for these totals are set forth in Confidential Exhibit LN-OSS-61 and Confidential Reply Exhibit LN-37.

CLECs Successfully Completing Testing in Interoperability and SATE

Test Environment	**Notarianni OSS Declaration (data as of 05/01/02)**	**Current (data as of 07/09/02) (data same at filing)****
Interoperability	26	27
SATE	5 Individual CLECs and 5 CLECs Through Service Bureau	11 Individual CLECs and 5 CLECs Through Service Bureau
Total # CLECs*	29	31

* CLECs may have used one or both of the Interoperability & SATE Test Environments across releases tested. Therefore the 'Total' count of CLECs is *not* equal to the sum of the number of CLECs testing in Interoperability & SATE in the columns labeled 'Notarianni OSS Declaration' and 'Current'.

** The numbers in this column were the same as of June 1, 2002. [302]

246. As of July 9, 2002, there were also 4 CLECs who were currently in the process of using SATE to test IMA-EDI but had not completed the testing and are therefore not reflected in the "Current Individual CLEC" numbers above. [303] One of these four CLECs, which is currently using SATE

302 *See* Qwest July 15 Ex Parte on Confidential EDI Testing Data.

303 *See id.*

and is doing its own testing, has previously used a Service Bureau and is counted in the "Current CLECs through Service Bureau" number above. [304]

247. The Pseudo-CLECs in both the ROC and Arizona OSS tests certified across multiple EDI releases using the Interoperability Test Environment for use in submitting functionality test transactions. In the Arizona OSS Test, HP also did an independent evaluation and certified using the SATE test environment across multiple releases. These counts are not included in the table above.

248. WorldCom's assertion that it is "difficult for CLECs to rely on SATE as a basis for evaluating a new version of an interface" [305] is impossible to credit in the face of the large number of CLECs successfully going into production after testing in SATE. Letters from two entities that have tested their software using SATE provide additional evidence that SATE mirrors production. Allegiance, a CLEC, states:

> The results [in SATE] are always consistent. Whether it be in the data returned, the timeframe for responses or the level of assistance I have received from my testing team, all have exceeded my expectations. [306]

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304 This company had first successfully tested in SATE through a service bureau for pre-order functionality, but is now individually using SATE to test ordering functionality.

305 WorldCom Comments, Lichtenberg Decl. at ¶90.

306 Reply Exhibit LN-38 (Letter to Jeff Thompson, Qwest, from Ian J. Coleman, Allegiance Telecom, faxed June 18, 2002).

NightFire, a software vendor that sells EDI software to CLECs, makes similar observations regarding its experience with SATE:

> NightFire has used SATE to test numerous pre-order and order transactions and [has] found that when a product is supported in SATE as well as in production, SATE mirrors the production environment. [307]

249. WorldCom's allegation that "CLECs have had little time to use SATE since its implementation to identify such differences" between SATE and production also is puzzling, in light of the fact that so many CLECs have gone into production following successful testing in SATE. [308] In fact, a large number of CLECs have had the opportunity to use SATE and to target these differences between SATE and production as a problem. Other than the submission of one SATE change request which has been implemented, CLECs have not identified any such issues in the SATE Users' Forum or by submitting change request through the CMP. [309] The differences between SATE and production simply do not harm a CLEC's ability to test successfully its code and to test its ability to use its EDI interface in the production environment.

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307 Reply Exhibit LN-14 (Letter to Jeff Thompson, Qwest, from Venkates Swaminathan, NightFire, dated June 27, 2002).

308 WorldCom Comments at 23, Lichtenberg Decl. at ¶90.

309 That change request (SCR 122701-2) was submitted by Allegiance in December 2001, and requested that Qwest change the NPA/NXXs used in SATE from fictitious NPA/NXXs to those that would match existing Qwest NPA/NXXs. The CR was approved and has been fully implemented across Qwest's regions.

B. The SATE Testing Environment is Stable.

250. AT&T argues that the SATE testing environment is not "stable" within the meaning of Section 271. It alleges that Qwest makes changes in SATE during the 30-day test period prior to implementation of a new release that make SATE an unstable test environment. Second, it states that when Qwest makes changes to SATE during that period, it does not make parallel changes to the production environment.

251. Neither assertion is correct. Qwest makes only "bug fixes" during the pre-release testing period. These "bug fixes" are production support changes necessary to correct bugs that are identified during pre-implementation testing. KPMG, in the third party test, itself concluded that SATE is a stable testing environment. [310] When Qwest identifies and makes production support changes in SATE, it will make the same changes in the production environment.

252. CLECs testing in SATE expect these production support changes during the 30-day period, as evidenced by the collaboratively adopted change management procedures involving the pre-release test period and production support changes. Specifically, under those procedures, Qwest is to provide a 30-day stable test window prior to implementation of a new major release, and can make only production support changes ("bug fixes") during that time. This requirement has been incorporated in the CMP Framework in

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310 *See Final Report* at 568.

the section titled "Change to Existing OSS Interfaces." [311] The CMP Framework also provides that Qwest will make those same changes to the production environment. [312] Thus, if a serious code issue is found during the 30-day window, Qwest will implement the fix both in the test environment and in the production release.

253. Making these changes to correct problems identified during the pre-release testing window do not make the testing environment unstable within the meaning of Section 271. Such changes are an expected part of thorough testing in the development cycle for any new release. Correcting these production support problems identified during the pre-release test period actually make the test environment more stable, by eliminating the bugs in the software in both SATE and production. [313]

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311 *See* Change Management Decl., Exhibit DLF-CMP-2 (CMP Framework), §§ 8.1.7, 8.1.8.

312 *Id.* § 8.1.7.

313 AT&T also contends that because Qwest had numerous updates to the documentation surrounding new releases, the test environment for those new releases is not stable. AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶92 n.60. First, many of the versions of the release documentation were preliminary, and were provided because at the time, HP was conducting its test of the 9.0 interface, and issuing more frequent releases enabled HP to resolve and close issues more quickly. Second, having several versions of new release documentation does not make the *test environment* unstable. It just requires CLECs to review the change summary and the specific changes to the documentation. Qwest issues updates to its release documentation in order to ensure that CLECs are promptly notified of any changes. Nevertheless, Qwest has undertaken to issue a maximum of one version of its SATE Data Document for each new release per month beginning in April, 2002.

C. SATE Mirrors Production.

254. This portion of the declaration addresses the arguments made by AT&T and WorldCom alleging that SATE does not "mirror production" within the meaning of Section 271. [314] This declaration expands upon the initial OSS declaration [315] to explain in more detail why it is not necessary for SATE to return the identical response that production would return in order for SATE to be deemed to "mirror production." [316]

255. As discussed in the OSS Declaration, the purpose of interface testing is to ensure that the CLEC's EDI interface (its code) works properly with the Qwest systems. More specifically, the purpose is to assure

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[314] AT&T Comments at 36-38, Finnegan/Connolly/Menezes Decl. at ¶¶93-108; WorldCom Comments at 21-23, Lichtenberg Decl. at ¶¶87-90.

[315] *See* OSS Decl. at ¶¶733-738. AT&T argues that the problems it describes from its Minnesota UNE-P test is evidence that Qwest's interface testing environment is inadequate. AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶83 n.54. AT&T's complaints regarding this test have nothing to do with the adequacy of the test environment, as evidenced by the statement made by AT&T's own witness in the complaint proceeding. There, AT&T's witness, Edward Gibbs, testified that "the one, two, three test is an excellent certification test." Reply Exhibit LN-39 (Testimony of Edward Gibbs, In the Matter of the Complaint of AT&T Communications of the Midwest, Inc. against Qwest Corporation, Vol. 3-B, MPUC DOCKET NO. P-421/C-01-391 (July 11, 2002)) at 855. By that, the AT&T witness was referring to the three stage process for becoming certified to use Qwest's EDI interface through Interoperability testing. *See* OSS Decl. at ¶¶707-710. To the extent AT&T is using the Minnesota UNE-P test as a basis for arguing that Qwest should be required to provide an end-to-end interface testing environment, the FCC has established that providing the capability for end-to-end testing is not required under 271. *See Georgia/Louisiana Section 271 Order* at ¶189; *Texas 271 Order* at ¶138.

[316] *See New Jersey 271 Order*, App. C at ¶42.

CLECs that their systems will be able to receive and display error messages and other responses, such as FOCs.

256. Each SATE test scenario is intended to generate a particular test response. The test response has the same structure as the production response. If a CLEC receives the prescribed test response, it knows that its code will work properly in production, even if the production response differs somewhat in content from the SATE test response.

257. What matters in interface testing is that the response comes back in a consistent format every time, and that the correct field is populated. The content of the data received is not as important because the CLEC's EDI code will generally not act on the content of the data; that will be done by a human being. [317] A CLEC's software works with the structure, not the content, of the data received. Each response transaction type has the same structure through which data is returned.

258. To be more specific, each order type and pre-order transaction type has a different "map." The map is the format for how transactions come to Qwest and how they go out. The map is consistent between production and SATE for all transactions. The map for any particular type of transaction has "tags" that remain consistent regardless of the content of the data received back within that transaction type.

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317 Qwest provides scenarios for the CLEC to test those situations in which Qwest believes varying content of the data may require CLECs to code their systems to take into account the variability of the data.

259. In the following paragraphs, this principle is illustrated through the treatment of error messages in SATE versus production. By way of background, for order transactions, CLECs receive error messages generated by the Business Processing Layer (BPL) of IMA. These messages are identical to production error messages because they are generated by a copy of IMA code. For pre-order transactions, error messages are generated both by the BPL and by systems and databases that lie behind IMA – so-called "legacy systems," which generate "legacy error messages." In SATE, which is a test environment separate from production, the legacy error messages are simulated to mimic the responses that would be received if the test transactions were actually sent to the production legacy systems.

260. Not every possible legacy error response is duplicated in SATE, because there are so many possible responses, and it is not necessary to test all those permutations in order to be satisfied that the CLEC's code will work in production. It therefore makes no sense for Qwest to incur the expense and effort of coding every possible legacy system error into SATE, when doing so would provide no additional benefit to CLECs. Even though Qwest has offered to code additional error messages into SATE upon CLEC request, it has to date not received any such requests.

261. Thus, once a CLEC has tested and confirmed its ability to receive an error message for a particular transaction type, it can be confident that it will be able to receive and process additional error messages for that same transaction type.

262. Each field of data within a map has a "tag" that remains consistent regardless of the content of the data received back within that transaction type. For example, the tag "MTX" will always be associated with the error message returned. The CLEC needs to be able to receive the error message in the appropriate field, so that it can be relayed to its destination for handling by a human being. This ensures that all error messages can be processed. An example of an EDI message that displays this mapping is attached as Reply Exhibit LN-40. Another example – which does not involve error messages – is also provided within Reply Exhibit LN-40. That example involves the return of different telephone numbers in production and SATE.

263. A CLEC can test its map by transmitting a few test transactions for each transaction type, and by receiving only a few error message responses. Once the CLEC confirms the map is working properly, they know that all error messages will be processed correctly regardless of which system originates the error message. Thus, a CLEC does not have to run a test transaction for all possible error messages, since the error messages all have the same structure and work the same way.

264. In sum, by coding a relatively small percentage of possible error messages into SATE, CLECs are able to test their ability to process 100 % of the possible error messages they would receive in production. Attached to the Qwest July 19 Ex Parte on Billing, Bill Auditability, Manual Processing, Manual Service Order Accuracy, SATE and Interfaces was a chart quantifying

the number and percentage of error messages coded into SATE versus production. [318]

265. As discussed in the OSS Declaration and below, Qwest also documents the manner in which SATE responses differ from production responses, and documents which production error messages are not included in SATE. [319] Qwest will add to SATE any other error messages that a CLEC requests, ten days or less after being approved. [320] Significantly, no CLEC to date has asked Qwest to include additional error messages in SATE. [321]

266. The following are examples of instances in which the SATE response is not identical to the production response. [322] These examples show that while the responses may not be identical, the purpose of interface testing is fulfilled in each case.

1. Reservation of an appointment longer than 8 hours.

In the production environment, the error message returned would be the equivalent of "you cannot reserve an appointment longer than 8 hours."

In SATE, the error message would be the equivalent of "no appointment available," because the specific error message

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318 This chart is included as an exhibit to this Declaration. Reply Exhibit LN-41.

319 OSS Decl. at ¶¶725 n.1052, 735, 762; *see* below at Section VII.C.

320 *See id.*

321 *See* Qwest July 19 Ex Parte on Billing, Bill Auditability, Manual Processing, Manual Service Order Accuracy, SATE and Interfaces at 8.

322 Much of the information in this section was previously provided to the Commission. *See* Qwest July 19 Ex Parte on Billing, Bill Auditability, Manual Processing, Manual Service Order Accuracy, SATE and Interfaces.

that would issue in production is not coded into SATE (though it could be, on request).

2. Retrieval of a CSR using an incorrect circuit ID number.

In the production environment, if you query using a circuit ID number that is not listed in the table (the table that matches circuit ID numbers to CSRs), you get an error message that is equivalent to "missing reference data in CRIS (circuit ID number not listed)."

In SATE, the error message would be the equivalent of "no active account." The circuit ID table that matches circuit ID numbers to CSRs is not coded into SATE.

3. Entry of incorrect zip code in preorder query.

Qwest associates each zip code in its 14-state region with a particular geographic area (a "CALA"). This enables Qwest to identify which database an address will be stored in, to more efficiently store and access this information.

In the production environment, when a CLEC enters a zip code that is outside the 14-state Qwest region, an error message will be returned that is the equivalent of "no CALA match for that zip code."

In SATE, the error message that would be returned would be equivalent to "address not found."

267. In each of these examples, the production error message differs from the SATE error message in its degree of specificity. For interface testing purposes, the specificity of the error message received is not what the CLEC relies upon for purposes of developing its EDI interface. Rather, what is important is whether the CLEC can receive and display the error message.

268. In these examples, the CLEC can successfully test its ability to receive the more specific production error message by testing in SATE, even though it may not actually receive the identical error message in SATE that it

will receive in production. SATE permits the CLEC to test whether its code will enable it to receive all the error messages generated in production. The differences between the SATE response and the production response therefore are immaterial.

269. Put differently, it is not necessary, nor is it the CLECs' desire, to run every possible test transaction and elicit every possible production response in order to be assured that the CLEC's code will reveal the responses once the CLEC is in production. In this regard, it is significant that no CLEC to date has asked Qwest to include additional error messages in SATE. Nor has the SATE Users' Group objected to the scope and type of error messages generated in SATE. [323]

270. AT&T is incorrect in suggesting that it cannot tell "whether an LSR containing data from responses received in the SATE will be successful in the production environment." [324] As explained above, receiving the same response as in production is not the point of interface testing. Rather, it is to ensure that a CLEC's code will work in production and will receive all production responses. The number of CLECs successfully testing in SATE also

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323 *See, e.g.,* SATE Users' Group Meeting Minutes (May 21, 2002), at 2-3 (attached as Reply Exhibit LN-42).

324 AT&T Comments, Finnegan/Connolly/Menezes Decl. at ¶106. *See also* WorldCom Comments at 21 and Lichtenberg Decl. at ¶90 (Using SATE, CLECs "have no way of knowing whether they will receive the same response in production and whether they should revise their systems, ask Qwest to revise its systems, or conclude that there is no need for any changes.")

undercuts the truth of WorldCom's assertions. [325] In fact, as discussed above, SATE does enable a CLEC to determine whether the LSR will be successfully processed in production and whether the CLEC can successfully receive and process any of the responses received in production. SATE includes copies of all the edits contained in IMA, in Flow-Through Systems (FTS), and in the service order processors (SOPs). Therefore, when a CLEC sends an order into flow-through, it will receive all of the edits that it would receive in production. [326]

271. WorldCom offers a particular example of a SATE response that differs from the production response as evidence that SATE does not mirror production within the meaning of Section 271. This is the only real-life example of a SATE issue mentioned by any CLEC in its comments. Even in this example, WorldCom presents no evidence that this situation caused any difficulty for either WorldCom or Z-Tel, its business partner that supports WorldCom's processing of LSRs.

272. WorldCom's example actually illustrates the opposite point. In WorldCom's example, if a CLEC inputs the word "drive" on an Address Validation Query, it may receive the response "no match" in SATE, whereas in production it may receive a "match" or "near match" response for that exact

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325 *See* §VII.A, *above;* Confidential Reply Exhibit LN-37; OSS Decl. at ¶140.

326 Pre-order responses in SATE are discussed above.

address. [327] Even though a CLEC may receive a "no match" response in SATE in this example, Qwest does provide CLECs with the ability to test "match" or "near match" responses in SATE. The fact that any particular input by the CLEC of a pre-defined test scenario address may result in an "no match" in SATE but not in production, is not a problem. The important thing is that CLECs are able to test that their systems are able to receive "near match" responses. It would make no sense for Qwest to code into SATE all possible addresses in all 14 of its States in the Qwest region, nor would a CLEC want to test all addresses. This example illustrates that it is not necessary for the CLEC to receive every response it might receive in production in order to know that its interface will work properly in production.

273. As the FCC has held, the testing environment need not be identical to production, as long as the testing and production environments "perform the same key functions." [328] This SATE clearly does, by enabling CLECs to test in SATE their ability to receive and process every response they might receive in production.

274. The Department of Justice, in its evaluation of SATE, also concluded that SATE meets the Section 271 "mirroring production" test. Specifically, the Department reached the following conclusions:

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327 WorldCom Comments at 22-23, Lichtenberg Decl. at ¶87.

328 *Texas 271 Order* at ¶138; s*ee also* Department of Justice Evaluation, July 23, 2002, at 29.

> [T]he Department believes that SATE is generally designed to – and does – operate similarly enough to the production environment to be an effective tool. Qwest uses production copes of the IMA system in order to replicate real-world production. The structure of the data in SATE mirrors the structure of the data in production. SATE Version 9.0 contains all IMA-EDI generated error messages that occur in production as well as common legacy system errors. Although in some instances the response received in SATE may not be identical to that which would have been received in production, Qwest documents any differences between the IMA production environment and SATE in the IMA-EDI SATE Data Document. [329]

275. In sum, then, the fact that there are some differences between responses received in SATE and those received in production does not change the fact that the two environments "perform the same key functions" and thus that SATE "mirrors production." [330] In the next section, I describe the manner in which Qwest documents the differences between SATE and production for CLECs.

D. Qwest Documents the Differences between SATE and Production

276. As noted above, Qwest documents the differences between SATE and production. This is done to assist CLECs in understanding the differences between the SATE environment and production, since SATE employs predefined test scenarios, unlike the production environment. Qwest also began providing documentation of the differences between the error

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329 DOJ Evaluation at 29-30.

messages received in SATE and in production for IMA release 9.0, in response to a recommendation made by HP, which conducted the SATE evaluation in the Arizona Third Party Test. [331] This section describes the nature and evolution of that documentation.

277. Qwest addressed the differences between SATE and production, including the identification of error messages, in three documents provided as exhibits to the OSS Declaration. [332] These exhibits are:

- SATE Data Document (Exhibit LN-OSS-48)
- EDI Implementation Guidelines for IMA (LN-OSS-47)
- IMA 10.0 Errors List (Exhibit LN-OSS-51)

278. Qwest has made each of these documents publicly available to CLECs. Relevant sections of these documents are briefly described below. The evolution of the IMA 10.0 Errors List is also described below, in order to fully identify where legacy system error messages are listed and the timing of their incorporation into the document.

- The *SATE Data Document* (Exhibit LN-OSS-48). The Overview section of this document includes information regarding data categories that may differ between production and SATE. For example, the SATE Data Document (p. 5) states that SATE will validate the USOCs used on an order against the list of USOCs valid in SATE for the state on the LSR, not the CLEC's contract. In production, IMA also edits

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330 *Texas 271 Order* at ¶138.

331 This recommendation is discussed further below. Qwest's response to this recommendation resolved a number of the issues HP had previously identified with SATE and the differences between SATE and production.

332 Much of the information in this section was previously provided to the Commission. Qwest July 19 Ex Parte on Billing, Bill Auditability, Manual Processing, Manual Service Order Accuracy, SATE and Interfaces.

the LSR against a list of USOCs provided for in the CLEC's Interconnection Agreement. This difference between SATE and production allows the CLEC not only to test all USOCs available in their specific contract but also to test additional products and features they may be considering in the future.

- The *EDI Implementation Guidelines for IMA* (Exhibit LN-OSS-47). The Progression Testing Phase section of this document (pp. 32-40) provides an overview of the Interoperability and SATE test environments. A schematic for each test environment depicting its major components and correlation to production systems is also provided. Additionally, a comparison of products and transactions supported is provided as well as a description of the behavior of the transaction responses as compared to production.

- The *IMA 10.0 Errors List* (Exhibit LN-OSS-31). This document contains the list of all business process layer (BPL) errors generated by IMA. These errors are identical for production and SATE, since SATE uses a copy of production IMA. This document does not list the production or SATE legacy system error messages. Qwest has provided the legacy systems error messages for production and SATE for IMA release 9.0, most recently in a document dated May 22, 2002 (the *9.0 IMA and SATE Errors List*);[333] and for IMA 10.0, initially on June 14, 2002, and most recently on July 8, 2002 (the *10.0 IMA and SATE Errors* document).[334] These

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[333] The *9.0 IMA and SATE Errors List* document was not included with the Application because Qwest provided information on SATE versus production only with respect to the latest IMA release (IMA 10.0).

[334] For the 9.0 EDI release, in response to a request from Hewlett-Packard in connection with the Arizona third party OSS test, on January 28, 2002, Qwest created and published the known errors available in SATE and those in production for IMA release 9.0. *See* OSS Declaration at ¶ 762. *See id.* (*9.0 IMA and SATE Errors List*, dated May 22, 2002). Qwest informed the Arizona Corporation Commission that it would gain input from CLECs and assess the value of maintaining this list on an ongoing basis. *See* Qwest's Response to HP's SATE Recommendations, December 28, 2001 (Exhibit LN-OSS-74), at p. 6. On May 7, 2002, the ACC staff issued a recommendation that Qwest continue publishing the error comparison lists for all future IMA releases. *See* ACC Staff Supplemental Report on Qwest's Compliance with Checklist Item No. 2 – Access to Unbundled Network Elements (UNEs) – Change Management Process and Stand-alone Test Environment, May 7, 2002 (Exhibit DLF-CMP-

two documents are included as Attachments A and B respectively to a July 19 ex parte filing in this proceeding. [335]

279. As discussed in the OSS Declaration, CLECs may also request additions or changes to the responses provided in the SATE test decks. [336] Qwest has committed to meeting such requests within ten days following approval. [337] To date CLECs have on several occasions requested and been granted the opportunity to add test data to SATE. To date, however, no CLEC has requested the addition of any error messages to SATE. The ability to add new test data to the test environment contributes to the mirroring of production under Section 271. [338]

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10) at ¶ 153. Qwest agreed to accept this recommendation and proceeded to prepare the SATE and production legacy error list for IMA 10.0. This document was published on June 14, 2002, the day after this Application was filed, and contained both the legacy system error list and the complete list of IMA (BPL) errors. The most recent combined *10.0 IMA and SATE Errors* document contains both BPL and production legacy system error messages included in SATE, and thus details how error messages available in SATE differ from production error messages. As noted above, this document was included as Attachment B to a Qwest ex parte filing made on July 19, 2002.

335 Qwest July 19 Ex Parte on Billing, Bill Auditability, Manual Processing, Manual Service Order Accuracy, SATE and Interfaces.

336 CLECs may request additional predefined responses for existing SATE products and functionality through the IMA-EDI Implementation Team using the SATE Data Request form. This form is available on the Wholesale Website at www.qwest.com/wholesale/ima/edi/document.html. *See* LN-OSS-16 (EDI Document Screen Shot).

337 Pursuant to procedures set forth in the EDI Implementation Guidelines for IMA, once the request has been reviewed and approved, Qwest will load the data into SATE within ten business days. *See* Exhibit LN-OSS-56 (EDI Implementation Guidelines for IMA), at 39.

338 *See Georgia/Louisiana 271 Order* at ¶189.

E. VICKI and Flow-Through Enhance the Mirroring of Production in SATE.

280. As noted in the OSS Declaration, to further mirror production in SATE, Qwest has (1) implemented test flow-through capability, which allows CLECs to test whether an order would flow through in production, (2) added automated post-order response capability in its Virtual Interconnect Center Knowledge Indicator ("VICKI"), and (3) added a test service order processor. [339]

281. As discussed in the OSS Declaration, VICKI and flow-through testing are different, and mutually exclusive, testing activities. VICKI uses pre-determined paths and test scenarios, with expected responses that may differ from a "real-world" response, whereas flow-through testing enables a CLEC to determine whether a particular LSR would "flow-through" if submitted in production. [340]

282. The purpose of VICKI is to allow CLECs to test predetermined test scenarios to ensure that the code is working as expected. The automated post-order response capability was added to VICKI in response to KPMG's concerns, which arose in connection with E3077. [341] The addition of an automated response capability in VICKI simply speeds up the process of receiving a response and enables CLECs to experience the delivery of a test

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339 OSS Decl. at ¶¶723-725.

340 OSS Decl. at ¶725.

341 OSS Decl. at ¶¶753-758.

response within a time frame similar to what would be experienced in production. (Or, at the CLEC's option, the automated VICKI post-order response can be delivered immediately, to save time.)

283. By design, VICKI is not intended to indicate whether an LSR would flow through in production, however. That capability is available through flow-through testing, added in all Qwest regions effective May 20, 2002. CLECs may send a transaction either to VICKI or to flow-through, and they will receive different responses in each, because each is designed to test something different and to provide CLECs with different feedback.

284. In light of this, WorldCom's complaint that "CLECs must select predetermined paths in order to receive responses automatically" is puzzling. [342] By definition, CLECs must select a path to send a transaction through VICKI, because VICKI is designed to test predefined scenarios. This is a positive, not a negative. It allows CLECs to determine whether they are receiving the response indicated by that particular test scenario. If they receive it, and receive it consistently, then they know their code is working. [343]

285. As noted by KPMG in connection with Exception 3077, VICKI now provides response times and response detail that is consistent with production response times and detail. [344] VICKI cannot, and need not, indicate

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342 WorldCom Comments, Lichtenberg Decl. at ¶85; *see also* AT&T Comments at 36, 37, Finnegan/Connolly/Menezes Decl. at ¶103.

343 OSS Decl. at ¶757.

344 *See* OSS Decl. at ¶755, citing E3077 Disposition Report at 2.

whether a particular test transaction will flow-through in production, however. That is the capability offered by flow-through and the test service order processor. [345] CLECs do not need to select a path to send an LSR to flow-through (or to receive manual processing of their response). Thus, there is no basis for the concerns voiced by WorldCom and AT&T regarding the need to specify a "path" in order to test what would happen to an LSR if submitted in production – because specifying a path is not necessary in flow-through testing.

F. The Interoperability Environment is Physically Separate from and Mirrors the Production Environment.

286. No commenter has questioned whether SATE is physically separate from the production environment. [346] WorldCom and AT&T do contend, however, that Qwest's Interoperability test environment is not physically separate from production within the meaning of Section 271. [347]

287. As stated in the OSS Declaration, "[o]rder transactions in the Interoperability Environment are processed by a *copy* of the production IMA system." [348] That test copy of IMA is physically separate from the actual production IMA system. Order transactions never leave the test copy of the IMA database. When Interoperability test transactions access production

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345 *See* OSS Decl. at ¶¶755-758.

346 *See Georgia/Louisiana 271 Order* at ¶187.

347 AT&T Comments at 35, Finnegan/Connolly/Menezes Decl. at ¶89; WorldCom Comments at 20-21, Lichtenberg Decl. at ¶81.

348 OSS Decl. at ¶712 (emphasis added).

legacy systems, it is only to pull data out, and thus there is virtually no possibility that legacy systems could be affected. WorldCom thus is incorrect in stating that the Interoperability environment is "simply a production environment with special flags for test orders." [349]

288. As noted in the OSS Declaration, order test transactions are not sent to the production databases. Therefore, "post-order responses in the Interoperability Environment are generated by Qwest technical personnel and issued back through the EDI environment to the CLEC." [350]

289. Pre-order transactions are read-only, with only two exceptions, and thus cannot impact the production environment. The two exceptions are appointment and telephone number reservation. These do not impact production because there are ample available appointments and telephone numbers available for assignment in production. In Interoperability testing, the appointments and telephone numbers are allocated exactly as they are in production and are returned back to the pool of available appointments and numbers. Because it is physically impossible for LSRs in the Interoperability environment to be introduced into production, there is no possibility that using appointments or telephone numbers from production will impact production.

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349 WorldCom Comments at 20, Lichtenberg Decl. at ¶81.

350 OSS Decl. at ¶712.

290. AT&T's suggestion that Interoperability environment has the potential to "crash" the production environment is puzzling, given that there is no physical connection to the provisioning systems or the service order processors; other connections are used only to retrieve data. [351] In the five years since Interoperability testing began, it has never cause a "crash" of the production environment.

291. In sum, neither pre-order, order, or post-order transactions in the Interoperability environment risk having an impact on the production environment. [352] Because Interoperability uses a copy of production IMA, and lacks the physical ability to transmit orders to production, the Interoperability environment is indeed "physically separate" from the production environment for Section 271 purposes. [353] The FCC does not, moreover, require actual physical separation of a test environment from production in every respect. In approving the Georgia/Louisiana 271 application, the Commission approved the physical separation of the test environment through "several safeguards to

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351 *See* AT&T Comments, Finnegan/Connolly /Menezes Decl. at ¶89.

352 WorldCom contends that Interoperability test orders have gone into production and that customer accounts have been changed. *See* WorldCom Lichtenberg Decl. at ¶81-82, citing HP Summary Evaluation Report on SATE, Version 3.0 (December 21, 2001), Exhibit LN-OSS-73 at 6-7. I am not aware of any adverse impacts to live accounts ever occurring due to testing in the Interoperability environment.

353 *See Georgia/Louisiana 271 Order* at ¶187.

prevent test orders from interfering with live orders" and segregation of the test environment "from production through both logical and structural means." [354]

292. AT&T and WorldCom also incorrectly contend that Interoperability Environment does not mirror production. [355] AT&T and WorldCom appear to concede that the IMA responses exactly mirror production, since the Interoperability environment uses an exact test copy of production IMA. [356] They nevertheless contend that because orders must be processed manually, the Interoperability test environment does not mirror production within the meaning of the FCC's 271 orders. [357]

293. The fact that orders are processed manually does not change the conclusion that the responses mirror production. The Interoperability test orders are processed manually so that they will not actually flow into production and be provisioned. The responses generated are otherwise identical to production responses, since the Interoperability environment uses an exact copy of production IMA and accesses the actual legacy production systems. While the Interoperability environment by definition lacks the capability to test flow-through, [358] this is not a flaw under Section 271, as the

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354 *Id.*

355 AT&T Comments at 35, Finnegan/Connolly/Menezes Decl. at ¶90; WorldCom Comments at Lichtenberg Decl. at ¶83.

356 *Id.*

357 AT&T, Finnegan/Connolly/Menezes Decl. at ¶ 90; WorldCom, Lichtenberg Decl. at ¶ 83.

358 *See* AT&T, Finnegan/Connolly/Menezes Decl. at ¶90.

FCC has not required flow-through as a necessary part of a testing environment. [359] If a CLEC wishes to test flow-through responses, it can conduct flow-through testing in controlled production. [360]

G. The Third Party Test Results Support a Conclusion That SATE is Adequate Under Section 271.

294. AT&T and WorldCom cite the closed unresolved status of two KPMG exceptions in the ROC third party test of SATE as a basis for denying Qwest's Application. [361] The issues identified by KPMG in the ROC Third Party Test were thoroughly addressed in the OSS Declaration, and need not be restated here. [362] Other than the single example discussed above in section VII (C), cited by WorldCom, neither AT&T nor WorldCom add any of their own

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359 *See Texas 271 Order* at ¶ 138.

360 The controlled production phase of testing, which follows the SATE progression testing phase, allows CLECs to experience the variability of production. Qwest places no limits on the extent of controlled production transactions that a CLEC might wish to transmit.

361 *See* AT&T Comments at 36, Finnegan/Connolly/Menezes Decl. at ¶¶93-107 and WorldCom Comments at 21-23, Lichtenberg Decl. at ¶¶84-85, 89-90, citing E3077 and E3095. AT&T also contends that Qwest should provide a stable test environment that mirrors production for its maintenance and repair application-to-application interface (Electronic Bonding Trouble Administration or EB-TA), citing KPMG E3109. AT&T Comments at 37 n.85, Finnegan/Connolly/Menezes Decl. at 114-117. As explained in the OSS Declaration, because the FCC does not require such interfaces for maintenance and repair, *a fortiori* the Commission could not, under Section 271, require that such an environment, if offered, be stable and mirror production. OSS Decl. at ¶¶771-72. In any event, as the CPUC pointed out, the EB-TA test environment is satisfactory, and the fact that CLECs gave this issue scant attention in Section 271 proceedings and workshops bears this out. CPUC Evaluation at 48-49. *See also* OSS Decl. at ¶¶773-78.

362 *See* OSS Decl. at ¶¶752-69.

evidence on these points; rather, they just recite the findings of KPMG. The discussion above, regarding the relevance of differences between SATE and production, should put to rest any "mirroring production" issues remaining from that test. In any event, the strong commercial data regarding the numbers of CLECs successfully testing and going into production using the SATE test environment, is compelling evidence that SATE performs the same functions as production, and thus "mirrors production" within the meaning of Section 271. [363]

295. AT&T and WorldCom also point to the KPMG closed unresolved Exception 3095 as a 271 issue. That Exception questioned the range of products available for testing in SATE. [364] As discussed in the OSS Declaration, ¶766, every resale and UNE product that CLECs were ordering via EDI at the time SATE was developed was included in SATE. Nothing in the FCC's 271 precedent suggests that every product must be included in a BOC's test environment, without regard to demand or other factors.

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363 *See above*, Section VII.A, and OSS Decl. at ¶740. By way of comparison, in the case of SWBT in Texas, there was no third party test of SWBT's interface testing environment, and the Commission instead relied on evidence that three CLECs had successfully used the SWBT testing environment, applying a "totality of the circumstances" test. *Texas 271 Order* at ¶138. The Commission there stated that "in those substantive areas not covered by the Telcordia test, we rely instead on other evidence, such as actual commercial usage, to assess whether SWBT provides nondiscriminatory access to its OSS." *Id.*, ¶103. *See also Georgia/Louisiana 271 Order* at ¶187 n.704 (CAVE test environment not subjected to third party test in Georgia, but FCC still approved it under Section 271).

364 AT&T Comments at 36, Finnegan/Connolly/Menezes Decl. at ¶93; WorldCom Comments at 21-22, Lichtenberg Decl. at ¶84.

296. Second, as also discussed in the OSS Declaration, the change management process is available for CLECs to request the addition of products to SATE. [365] Qwest introduced 23 change requests to add products to SATE. [366] Fourteen of these were withdrawn for lack of CLEC interest, and the others remain available for inclusion in future releases of SATE. Two were prioritized high enough to be packaged as candidates for IMA release 11.0 in June 2002, which is scheduled for release on October 19, 2002, in SATE (Facilities Based Directory Listing (FBDL) and EEL). [367] If in the meantime a CLEC is interested in testing an EDI interface for a product that is not yet available in SATE, the Interoperability Environment is available. In fact, several CLECs and a P-CLEC have utilized the Interoperability environment for FBDL or EEL and are currently in production for these products. [368] Thus, Qwest's testing environments provide CLECs sufficient opportunities to test all products.

297. As discussed in the OSS Declaration, the Hewlett Packard's (HP's) evaluation of SATE in Arizona yielded positive conclusions about the adequacy of SATE. In December 2001, HP concluded that "SATE is adequate to support Qwest CLEC testing in the State of Arizona given the current level of

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365 OSS Decl. at ¶766.

366 OSS Decl. at ¶¶767-768.

367 OSS Decl. at ¶768.

368 *See* Confidential Reply Exhibit LN-37 (CLECs testing in SATE and Interoperability as of July 9, 2002, including products tested).

CLEC usage." [369] As the Department of Justice noted, "HP, through its transaction testing of SATE in Arizona, found the accuracy and consistency of SATE test responses to be adequate to support certification." [370] HP also concluded that "the accuracy and consistency of SATE test responses was adequate to support certification." [371] HP made recommendations for improvements to SATE, which Qwest agreed to and which have been implemented, except for changes to the PO-19 performance measure, which are still pending before the Arizona Commission. [372]

298. WorldCom and AT&T contend, despite these positive findings, that HP did not resolve its concerns regarding "business rules consistency between SATE and production systems." [373] These HP concerns either have been resolved through further testing or have been addressed by the HP recommendations, which Qwest has agreed to comply with. [374] Qwest filed its first quarterly status report in response to the ACC Staff

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369 HP SATE Summary Evaluation Report, Version 2.0, Dec. 21, 2001, at § 1.1 (Exhibit LN-OSS-73).

370 Department of Justice Evaluation at 30.

371 *Id.* at §2.1.3.

372 *See* OSS Decl. at ¶¶750-751.

373 WorldCom Comments, Lichtenberg Decl. at ¶86; AT&T Comments, Finnegan/Connolly/Lichtenberg Decl. at 108-109.

374 As Bill Koerner of HP stated in an Arizona workshop, "[a]ll the issues that we had left as closed unresolved were tied to a particular recommendation." OSS Final Workshop 8 Transcript (January 31, 2002), p. 593.

recommendations on June 27, 2002. [375] As detailed in that status report, Qwest has fully implemented or otherwise addressed all but two of the twelve recommendations of HP and the ACC. [376]

299. The remaining two recommendations relate to finalizing the PO-19B PID, which is still being addressed by the Arizona Corporation Commission. [377] The definition of PO-19B is at impasse before the ACC Staff on the issue of whether low-volume transaction types (those that make up, in total, less than five percent of all transactions) should be included in the PO-19B measure. As noted in the OSS Declaration, ¶742, the Arizona Corporation Commission Staff has indicated that the modification to PO-19 and subsequent evaluation would be outside the scope of the Arizona 271 proceeding. [378]

300. Qwest has met or exceeded the 95 percent benchmark for PO-19 for each of the five months ending with June. Qwest met this 95 percent standard in each month. [379] Preliminary results of the new PID designed specifically to measure the extent to which SATE mirrors production (PO-19B) also support the conclusion that SATE satisfies the Section 271

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375 *See* "Qwest Corporation's Quarterly Status Report on the SATE Recommendations," filed in ACC Docket No.T-0000A-97-0238 (Reply Exhibit LN-43).

376 *See* Reply Exhibit LN-43 (Quarterly SATE Status Report).

377 *See* OSS Decl. at ¶¶751 n.1103.

378 *See* OSS Decl. at ¶742; Reply Exhibit LN-44 (Transcript, ACC OSS Final Report Workshop 10, Volume II (April 11, 2002)) at 107.

379 Specifically, for this five month period, Qwest successfully executed 95.38, 97.10, 99.70, 98.03, and 98.95% of test transactions within SATE. *See* Regional Commercial Performance Results at 75 (PO-19).

standard. These preliminary results are now available for July (the first month in which PO-19B was measured). HP is scheduled to evaluate these performance results and report back to the Arizona Commission staff later this summer. Although HP has not yet analyzed the results, the preliminary data show that Qwest achieved a 98 percent mirroring rate (which is above the benchmark of 95 percent). The resolution of the impasse issue regarding the definition of PO-19B should not affect the persuasiveness of this data. The Department of Justice also supports the tracking of data for PO-19B by the Colorado PUC. [380]

301. AT&T and WorldCom also argue that the Arizona test results are not valid because HP did not test VICKI and flow-through. [381] Although the ACC Staff asked HP to conduct a test of SATE for a new release (IMA 9.0), the ACC specifically rejected CLEC requests to include VICKI and flow-through in the additional testing, citing the evolutionary nature of SATE and the development of a new PID submeasure (PO-19B). [382] It is worth observing, nevertheless, that in testing release 9.0, HP "was able to use VICKI on 77 scenarios, and encountered no issues related to VICKI." [383]

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380 Department of Justice Evaluation at 30-31.

381 AT&T Comments at 38 n.87; *see also* WorldCom Comments, Lichtenberg Decl. at ¶86.

382 Reply Exhibit LN-45 (ACC Impasse Issue: SATE (Master Issue #942) (April 15, 2002)), at 7-8.

383 HP SATE New Release Test Summary Report, Version 3.0, April 26, 2002, at §3.7.3, Reply Exhibit LN-46.

302. In sum, the results of both the ROC and Arizona third party tests, in combination with other evidence Qwest has presented on the effectiveness of SATE and the strong commercial evidence of CLECs' successful testing in SATE, support a conclusion that SATE satisfies the requirements of Section 271.

VIII. OTHER ISSUES

303. Eschelon argues that Qwest may have failed to issue an outage notification for its Qhost system. [384] No such notification was required, however. Qhost is not a system that Qwest makes available to CLECs for DSL ordering. CLECs only need access to IMA for Qwest resale DSL. Qhost is used by ISPs to obtain customer configuration information. Thus, because CLECs functioning as CLECs do not use Qhost, the CLEC outage notification process does not apply. Moreover, on those occasions when Qhost is down, Qhost users can obtain this same information by calling Qwest at one of the phone numbers cited on the Qhost website at http://apps.qwest.com/qhost/content/contacts2.html.

304. This concludes my declaration.

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384 *See* Eschelon at 12.

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 26th July, 2002.

Lynn M V Notarianni

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 7-27, 2002.

Christie L. Doherty

Christie L. Doherty

Data Elements in Loop Qualification Tools

Field Names	UNE Remand Order Requirements	IMA Loop Qualification Tool**	MA Raw Loop ata Tool and ire Center Batch aw Loop Data ool	Retail/ Resale Qwest DSL Tool
Bridge Tap Offset Distance	X		X	
Bridge Tap Quantity	X	X	X (Bridge Taps per segment presented)	
Cable Name	X	X	X	
Fiber or Metal	X	X	D (from Cable Name)	
Gauge	X	X	X	
Length and Gauge for Bridge Tap	X	X	X	
Length of Loop for that Gauge	X	X	X	
Load Coil Quantity	X	X	X (Load Coils per segment presented)	
Load Coil Type	X	X	X	
Loop Length	X	X	X (each segment length presented)	
Number of Gauge Changes	X		X (gauge changes presented in Loop Makeup Description)	
Pair Number	X		X	
Pair Gain Indicator	X	X	X	
Pair Gain Type	X		X	
F1/F2 Disturber Location and Type	X[1]			

[1] Disturber information is not contained in Qwest's records at a loop level. Disturber information is kept in the Engineering records at a binder group level, because the information is used to perform overall network management and binder management. The FCC disagreed with CLECs' requests to "require incumbent LECs to catalogue, inventory, and make available to competitors loop qualification information through automated OSS even when it has no such information available to itself." The FCC went on to state that "[i]f an incumbent LEC has not compiled such information for itself, [it does] not require the incumbent to conduct a plant inventory and construct a database on behalf of requesting carriers." *UNE Remand Order*, 15 FCC Rcd at 3885

Field Names	UNE Remand Order Requirements	IMA Loop Qualification Tool**	MA Raw Loop ata Tool and ire Center Batch aw Loop Data ool	Retail/ Resale Qwest DSL Tool
Remote Switch Indicator		X	D (for locations of remote DSLAMs the Terminal ID contains both the word DSLAM and then the physical address)	
Status of Loop		X	X	
# of Wires – 2-or 4-wire		X		
CKID – Circuit Identifier		X	X	
End User Address		X	X	
Equivalent Loop Length (determined as if the loop were all 26 gauge)		X	D (from Loop Makeup Description)	
Insertion Loss (calculated at 196 kilohertz frequency with 135 ohm terminations)		X		
MLT Distance (Mechanized Loop Test)			X	
Pair Number		X	X	
Qualification Result		X	D (based on all info returned)	X
RLC - Remote Location CLLI		X	X	
Terminal Address per Segment		X	X	
TN - Telephone Number		X	X	X
Wire Center CLLI		X	X	
Wire Center Name (CLLI code)		X	X	

Functionality of Tools

IMA Loop Qualification Tool

- User can query by either telephone number (TN) or an address.

(¶ 429), footnotes omitted. As stated, Qwest does not compile this information at the loop level for itself.

- User can choose to qualify for resale or unbundled services.
- User will receive loop qualification information for both published and non-published telephone numbers.
- IMA will respond with a qualification result as well as LSOG 5 compliant loop level data.
- The IMA response will include up-to-date loop level data from LFACS.

IMA Raw Loop Data Tool for Assigned/Working Loops

- User can query by either (i) an address and obtain information on up to 24 loops at that address or (ii) by TN and obtain information for up to 24 TNs.
- User will receive loop makeup information for both published and non-published TNs.
- IMA response will include up-to-date raw loop data from LFACS.
- Response will return information on unbundled loops assigned to CLECs.[2]

IMA Raw Loop Data for unassigned/spare loops

- User can query by address.[3]
- Response will return all data elements as are returned with an Assigned/Working raw loop data query.
- Unassigned loop is a loop with a status of CNF (connected facility; non-primary end-to-end loop), CT (connected through; primary connected through spare), PCF (partially connected facility).

Wire Center Batch Raw Loop Data Tool

- Website accessed with a digital certificate.
- User can select a wire center CLLI that is listed and download all the loop data for working and unassigned loops for an entire wire center.
- Response will return all data elements as are returned with an Assigned/Working raw loop data query.

All data elements for these tools are documented in the Loop Qualification and Raw Loop Data CLEC Job Aide, IMA 10.0, Exhibit LN-OSS-7. In addition, if the Raw Loop Data or the Loop Qualification Tools provide incomplete or unclear loop makeup information, the CLEC can invoke the manual look-up process and request Qwest to perform a manual search of its back office records, systems and databases containing loop information to obtain the loop makeup information requested by the CLEC. *See* Section (III)(A)(2)(f)(i)(c) of the Declaration for additional information about this process.

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[2] There are no TNs associated with unbundled loops.

[3] User cannot query by TN because there is no TN associated with an unassigned loop.

Legend

** = Data returned via Loop Qual Tab and Loop Data Tab. Based on LSOG 5.
X = Present/Available
D = Determinable by Other Data Provided

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of a Commission Investigation into Qwest's Compliance With Section 271(c)(2)(B) of the Telecommunications Act of 1996	)	PUC Docket No. P-421/CI-01-1371 OAH Docket No. 7-2500-14486-2

COVAD COMMUNICATIONS COMPANY'S RESPONSE TO QWEST CORPORATION'S MOTION TO COMPEL RESPONSES AND PRODUCTION OF EVIDENCE

Covad Communications Company respectfully submits this response to Qwest Corporation's ("Qwest") Motion to Compel Responses and Production of Evidence from Covad. For the reasons set forth more fully below, Qwest's Motion should be denied in its entirety.

I. PRELIMINARY STATEMENT

Qwest's Motion is nothing if not unduly premature. As of the date it filed its Motion, July 19, 2002, less than 48 hours had elapsed between the time Qwest made clear the scope of its demands and provided the clarification Covad had requested, and the filing of the Motion. Even more concerning, Qwest chose to file its Motion even while knowing that Covad would be providing supplemental responses that same day and on the next business day. Qwest's decision to squander the scarce resources of a small, yet to Qwest's chagrin, very vocal opponent and, more importantly, of the Office of Administrative Hearings, should not be countenanced – particularly since, from Covad's perspective, Qwest has received all information currently available to Covad and to which Qwest legitimately is entitled. For these reasons, Qwest's Motion should be denied.

order to determine whether a loop can support Covad DSL service, and confirming that it will not place an order if the prequalification undertaken suggests that the loop cannot support Covad service. Further, during a July 16, 2002 conversation with Qwest, Covad confirmed that the RLDT provides all categories of information required by Covad, confirmed that it was not seeking to provide service that exceed the technical specifications of the loop being ordered, and confirmed that the technical specifications of the DSL services that both Covad and Qwest offer are not materially different. Given the purpose of the Covad testimony and its clear focus on the inaccuracies in the RLDT, Covad's responses to IR Nos. 8, 11, 13 and 23 provided Qwest with all the information it required. *See* Exhibits 1 and 3.

Notwithstanding that, Qwest seeks the disclosure of the technical specifications of Covad DSL. For Covad, these specifications are the heart of its business and the method by which Covad differentiates itself from all other DSL providers. As Covad informed Qwest, it is the Covad-equivalent to the recipe for Coca-Cola. Consequently, the "recipe for Covad DSL" is of the utmost competitive sensitivity to Covad, and constitutes one of its most highly guarded trade secrets, such that the improper disclosure of such information would result in irrevocable harm to it.

Qwest has provided no foundation for the production of this critical, competitive information. Covad has never invoked technical differences between its DSL products and that offered by any other entity to suggest that the RLDT should provide different or additional types or categories of information. Covad has never stated in any testimony or brief that the categories of information provided by the RLDT are insufficient for it to determine whether a loop meets Covad's technical needs. Covad has never stated that anything other than that the RLDT returns inaccurate and unreliable information. In short, there is nothing about its testimony or the Covad

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

QWEST'S LEGAL BRIEF REGARDING LOOP ISSUE 24, xDSL FOC TRIAL

INTRODUCTION

Qwest Corporation ("Qwest") submits this brief to the Commission in support of its compliance with checklist item 4 (unbundled loops) of the competitive checklist items in Section 271(c)(2)(B) of the Telecommunications Act of 1996 (the "Act").[1] This brief addresses one issue: Loop 24, the results of the Colorado xDSL FOC Trial. In December 2000, Qwest proposed a two-month Trial involving all Colorado CLECs to test the efficacy and benefits of changing Qwest's Firm Order Confirmation (FOC) processes for xDSL Loops (2/4 Wire Nonloaded Loops, ADSL Compatible Loops, ISDN Capable Loops and xDSL-I Capable Loops) from a 24-hour FOC to a 72-hour FOC. The additional 48 hours permitted Qwest to confirm the availability of compatible loop facilities. The primary purpose of the Trial was to determine if moving to a 72-hour FOC provided CLECs with a "more meaningful" FOC. The parties agree – Qwest should move to a 72 hour FOCand should so modify its ROC PID (PO-5).

In addition, Qwest and CLECs agreed as part of the Trial to evaluate whether data contained in Qwest's Raw Loop Data (RLD) Tool, the tool that permits CLECs to qualify loops for xDSL service prior to placing an order, was accurate. The Trial showed that the information in Qwest's RLD Tool was generally accurate and at parity with that which Qwest provides to itself. Qwest did uncover; however, some databases gaps, which, as a result, Qwest has already

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[1] 47 U.S.C. § 271(c)(2)(B)(iv).

Qwest appreciates Covad's candor in withdrawing its data, and does not relate this data reconciliation process to criticize Covad. Rather, an important component of the xDSL Trial was the performance data Qwest presented and Qwest's ability to track data accurately. CLECs suggested that reconciliation of this data was critical to evaluating the Trial, even though only one CLEC chose to engage in the process. The data reconciliation process was extremely time consuming, spanning several weeks and numerous on and off-line conference calls. In the end, Qwest's data stands unrefuted.

B. Raw Loop Data Tool

As mentioned above, a second component of the xDSL FOC Trial entailed an evaluation of the Raw Loop Data (RLD) Tool, a mechanized pre-order loop qualification Tool Qwest makes available to CLECs that draws from the same loop make up information Qwest uses to qualify retail customers for Qwest DSL. For each loop ordered during the Trial, Qwest accessed the IMA Address Validation Tool and requested raw loop data. The analysis revealed that the information in the RLD Tool is accurate at least 80% of the time.[2] However, Qwest also found that approximately 35% of the time, the RLD Tool generated a "No Working Telephone Number" response and provided no raw loop data at all. Qwest investigated this response, found the RLD Tool had a gap that applied equally to retail and wholesale, and has already planned to remedy the gap through system upgrades. Thus, Qwest has proactively addressed the one situation when CLECs cannot obtain accurate information from the RLD Tool.

Qwest and Covad also engaged in a data reconciliation process regarding the RLD. As Qwest already acknowledged above, Covad was unable to obtain results for some orders because of the "No Working TN" response. To reconcile their remaining issues, Qwest and Covad

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[2] The data showed that the RLD Tool clearly provided accurate data 80% of the time. The data also showed that the Tool provided inaccurate data 1% of the time. The remaining 19%, however, is impossible to assess. Attached *Exhibit JML-1* shows that there were instances when the RLD Tool showed that the loop was not provisioned on copper, but Qwest found a copper alternative. The problem, of course, is that Qwest has committed to seeking alternatives (i.e.: line and station transfers) when a copper alternative is necessary. Thus, for these 19%, the tool may very well be accurate, but in an effort to meet its obligations, Qwest provisioned the loop when it could. All Qwest can say, therefore, is the tool is accurate at least 80% of the time.

Raw Loop Data Analysis

	April Totals	% of April RLD	March Totals	% of March RLD
Total Number of Orders	1294		1201	
Total Number of RLD Observations	827		767	
RLD Provided Reliable Data		81.4%		79.8%
Perceived False Negatives				
RLD	**Actual Provisioning**			
Not Copper	Copper Found	98	11.9%	72	
Loaded	Conditioning Not Required	52	6.3%	70	
Total		150	18.1%	142	18.5%
False Positives				
RLD	**Actual Provisioning**			
No BT	BT Removed	1		7	
No Loads	Load identifed after FOC	3		6	
Total		4	**0.5%**	13	**1.7%**

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation Into U S WEST COMMUNICATIONS, INC.'s [1] Compliance With Section 271 of the Telecommunications Act of 1996	)	DOCKET NO. UT-003022
In the Matter of U S WEST COMMUNICATIONS, INC.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996	)	DOCKET NO. UT-003040

TWENTY-EIGHTH SUPPLEMENTAL ORDER

COMMISSION ORDER[2] ADDRESSING WORKSHOP FOUR ISSUES: CHECKLIST ITEM NO. 4 (LOOPS), EMERGING SERVICES, GENERAL TERMS AND CONDITIONS, PUBLIC INTEREST, TRACK A, AND SECTION 272

[1] Since the inception of this proceeding, U S WEST has merged and become known as Qwest Corporation. For consistency and ease of reference we will use the new name Qwest in this order.

[2] This proceeding is designed, among other things, to produce a recommendation to the Federal Communications Commission (FCC) regarding Qwest's compliance with certain requirements of law. This order addresses some of those requirements. The process adopted for this proceeding contemplates that interim orders including this one will form the basis for a single final order, incorporating previous orders, updated as appropriate. The Commission will entertain motions for reconsideration of this order so that issues may be timely resolved.

Qwest

32 Qwest asserts that it provides loop qualification data to CLECs at parity with how it is provided to Qwest's retail personnel. Qwest points to Exhibit 946, in which the OSS test vendor found that Qwest's loop qualification tools for retail and wholesale operations were at parity.

Discussion and Decision

33 The issues we must decide are: (1) whether the access CLECs have now is adequate to provide them parity, (2) whether it provides the information the FCC requires, and (3) whether additional safeguards or conditions are necessary to ensure the required access going forward. Concerning the first and second issues, Exhibit 946 demonstrates that the RLDT does provide the required information, and appears to be at parity, presently, with what Qwest provides to its itself. However, as AT&T asserts, there is no guarantee that the RLDT will continue to provide the necessary information. More specifically, there is no way of knowing whether the loop qualification tools available to CLECs will remain at parity with those Qwest is using.

34 Concerning the last issue, the *UNE Remand Order* [9] at paragraph 430 requires that Qwest provide access to loop qualification information that exists anywhere within the incumbent's back office. We have reviewed the Texas Model Interconnection Agreement (T2A), and note that it does allow CLECs access to the LFACS database of SWBT. However, it also provides that CLECs needing further information, or clarification, regarding loops other than what resides in LFACS are required to request it from SWBT. SWBT is in turn required to provide the so-called "backend" information in the same time frame and manner as it provides such information to its retail departments.[10] Qwest's SGAT does not include such a procedure, which is necessary to provide CLECs the same access to loop qualifying information that is not accessible electronically, as required by the *UNE Remand Order* at paragraph 431. Qwest must modify its SGAT to include such a procedure.

35 We also require Qwest to modify the SGAT to allow CLECs to audit the loop qualification tools provided to them, to determine that the tools provide the same information, in the same time frame, to CLECs as Qwest's internal data tools provide to its retail operations, and that Qwest provides all the information required by the FCC.

36 During oral argument, Covad agreed with Qwest that, with the exception of Pacific Bell, now SBC, no other RBOC allows or provides pre-order use of MLT. Covad further stated that MLT is not a loop information tool, but a quality assurance tool,

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[9] *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996,* CC Docket No. 96-98, Third Report and Order, 15 FCC Rcd 3696, 3704 *(UNE Remand Order).*

[10] T2A, Attachment 25, xDSL-TX, at 6, 7.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation Into U S WEST COMMUNICATIONS, INC.'s [1] Compliance With Section 271 of the Telecommunications Act of 1996	)	DOCKET NO. UT-003022 DOCKET NO. UT-003040 31ST SUPPLEMENTAL ORDER; ORDER GRANTING QWEST'S PETITION FOR RECONSIDERATION OF THE 24TH SUPPLEMENTAL ORDER AND GRANTING AND DENYING PETITIONS FOR RECONSIDERATION OF THE 28TH SUPPLEMENTAL ORDER
In the Matter of U S WEST COMMUNICATIONS, INC.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996	)	

I. SYNOPSIS

In this Order, the Commission grants Qwest's petition for reconsideration of the Commission's 24th Supplemental Order, and will allow Qwest to apply the FCC's local use restriction to enhanced extended loops. Further, this Order grants in part and denies in part Qwest's petition for reconsideration, and denies AT&T's petition for reconsideration of the Commission's 28th Supplemental Order.

II. BACKGROUND AND PROCEDURAL HISTORY

1 This is a consolidated proceeding to consider the compliance of Qwest Corporation (Qwest), formerly known as U S WEST Communications, Inc., with the requirements of section 271 of the Telecommunications Act of 1996 (the Act)[2] and to review and consider approval of Qwest's Statement of Generally Available Terms and Conditions (SGAT) under section 252(f)(2) of the Act. The Commission is conducting its review in this proceeding through a series of workshops, comments by the parties, and the opportunity for oral argument to the Commission on contested issues.

[1] Since the inception of this proceeding, U S WEST has merged and become known as Qwest Corporation. For consistency and ease of reference we will use the new name Qwest in this Order.
[2] Pub. L. No. 104-104, 110 Stat. 56, *codified at* 47 U.S.C. § 151 *et seq.*

15 AT&T argues that the Commission's decision is proper and responds that the *Sprint Arbitration Order* does apply to the issue of dark fiber. *AT&T's Answer to Qwest's Petition for Reconsideration and Clarification of Twenty-Eighth Supplemental Order at 14-16 (AT&T's Response).* AT&T asserts that dark fiber cannot be considered an EEL as it cannot provide transport because it is not lit. *Id. at 15.* AT&T argues that the *Sprint Arbitration Order* applies to dark fiber as it mirrors the FCC's rule on the issue. *Id.*

16 **Discussion and Decision:** After further review of the FCC's orders and the parties' arguments, we reluctantly reverse our decisions in the *24th* and *28th Supplemental Orders* that prohibit Qwest from applying local use restrictions to EELs. We acknowledge that a "necessary and impair" analysis has not been performed on facilities used for exchange access, and that, therefore, such facilities may not be priced as UNEs. However, this Commission remains philosophically opposed to the concept of defining elements as UNEs based on how they are to be used. In our view, the use of an element should not dictate its pricing.

17 Given our decision that local use restrictions apply to EELs, and dark fiber used as EELs, we now must decide several ancillary issues regarding the application of such restrictions.

18 First, we believe the restriction applies equally to new EELs and converted EELs. CLECs should not be harmed by this finding, as Qwest is required to process orders for CLEC EELs based on the CLECs' certification that the facilities will pass the significant local usage test.

19 Second, we disagree with AT&T's argument that the local usage tests apply only to individual end-user facilities, and therefore cannot be applied to dark fiber which serves multiple end-users. As Qwest noted in its comments on the *20th Supplemental Order*, Options 2 and 3 of the FCC's *Supplemental Order Clarification* appear to apply to multiple end-user facilities, and therefore are appropriate to apply to dark fiber facilities used as EELs.[7]

B. 28th Supplemental Order Issues

1. WA LOOP 3(a)a/3(b): Access to LFACS and MLT

20 This issue concerns access by competitors to Qwest's loop information. During the workshop, AT&T requested direct access to Qwest's Loop Facilities and Assignment Control System (LFACS) loop qualification tool, in addition to the Raw Loop Data Tool (RLDT) that Qwest makes available to competitors. Covad also sought access to the Mechanized Loop Testing (MLT) to ensure that it receives a loop that is

[7] *Supplemental Order Clarification, ¶22.*

capable of supporting DSL services. The *20th Supplemental Order* determined that Qwest had satisfied its requirement to provide competitors access to all loop data available to Qwest's own operations. *20th Supplemental Order at ¶74.*

21 Based on AT&T's arguments that the *UNE Remand Order* establishes a parity standard for access to BOC loop information, and a review of provisions in the Texas model interconnection agreement, the *28th Supplemental Order* required that Qwest modify its SGAT to allow CLECs access to Qwest's back office loop qualification information in the same time and manner as Qwest retail operations. *28th Supplemental Order at ¶34.* The *28th Supplemental Order* also requires Qwest to modify the SGAT to allow CLECs to audit the loop qualification tools Qwest makes available to determine whether Qwest provides that information at parity with the information is provides to its retail operations. *Id. at 35.*

Qwest

22 Qwest requests the Commission reverse its decision in paragraph 35 of the *28th Supplemental Order* requiring Qwest to modify the SGAT to allow CLECs to audit Qwest's loop qualification tools. *Qwest's 4th Workshop Petition at 7.* Qwest asserts that "neither the *UNE Remand Order*, nor any Section 271 Order" require Qwest to subject itself to numerous audits. *Id.* Qwest identifies a number of upgrades it has made to its RLDT, and notes that it does not object to the requirement in paragraph 34 of the *28th Supplemental Order* that Qwest respond to manual loop make up requests. *Id. at 3-7.* Qwest argues that section 271 proceedings are limited in scope and not the proper forum to create new obligations. *Id. at 7.*

23 Qwest asserts that an audit provision is not necessary. Qwest asserts that KPMG has already audited Qwest's loop qualification systems and found them at parity with what Qwest provides to itself. *Id. at 8.* In addition, Qwest notes that, after the oral argument, KPMG determined that Qwest met all of the requirements for loop qualification tools in the ROC Master Test Plan. *Id.* Qwest states that it has committed in section 9.2.2.8 of the SGAT to provide nondiscriminatory access to loop qualification information. *Id.*

24 Qwest is concerned that the Commission's audit requirement does not place any limits on CLECs. It does not require that CLECs make a showing, and every CLEC opting into the SGAT could request an audit. *Id. at 8-9.* Qwest suggests that, if the Commission determines an audit provision is necessary, the Commission require CLECs to retain an independent third party to conduct the audit, or that CLECs petition the Commission to resolve any dispute over loop qualification tools. *Id. at 9-10.*

25 AT&T: AT&T argues that the Commission's requirements for access to back office information and CLEC audits of loop qualification information in paragraphs 34 and

35 of the *28th Supplemental Order* are proper and consistent with FCC decisions in the *UNE Remand Order*, *SBC Kansas/Oklahoma Order*,[8] and *Verizon Massachusetts Order*.[9] *AT&T Response at 2-3.* In particular, AT&T asserts that SWBT provides competitors direct access to LFACS through a graphical user interface, whereas Qwest does not, but merely identifies information from LFACS and places it into the RLDT. *Id. at 4.* AT&T also asserts that in Massachusetts, Verizon provides direct access to its loop qualification tools. *Id. at 5.* AT&T asserts that "Qwest employees have the ability to access LFACS, other data bases, as well as review paper records and manual review processes to provision service to its customer, yet Qwest continues to object to providing that same access to CLECs." *Id. at 6.* AT&T argues that "Qwest's SGAT does not contain the required legal obligation for access to loop and loop qualification information." *Id. at 9.*

26 AT&T takes issue with the way Qwest has interpreted the FCC's and this Commission's requirements concerning access to back office information. *Id. at 10-11.* AT&T asserts that KPMG is continuing to test whether Qwest is providing access to loop information at parity. *Id. at 13.* AT&T disputes that it will request frivolous audits of loop qualification information, and notes that the Texas Commission has ordered a similar audit provision in Texas. *Id.*

27 **Discussion and Decision:** We commend Qwest for its efforts to upgrade and enhance its RLDT to include additional loop information. We agree that, if Qwest continues to upgrade and enhance this tool, CLECs will receive all the necessary information to qualify loops for xDSL services and manual loop make-up requests and audits of Qwest's loop information will be infrequent. However, we are interested in ensuring that competitors continue to receive appropriate information even after approval of a section 271 application.

28 We are mindful of the FCC's concern that CLECs obtain loop information in the same time and manner as the BOC's retail operations.[10] The only way we can ensure that the RLDT contains the same information available to Qwest's retail operations is to allow competitors to make manual loop make-up requests and to audit Qwest's information, if it appears to be necessary to do so. Nothing in the FCC's decisions prohibits such a safeguard. The provisions of SGAT section 18.2.8 provide that a

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[8] *In the Matter of 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,* Memorandum Opinion and Order, CC Docket No. 00-217, FCC 01-29, ¶121 (rel. Jan. 22, 2001) (*Kansas/Oklahoma Order*).

[9] *In the Matter of 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,* Memorandum Opinion and Order, CC Docket No. 01-9, FCC 01-130, ¶54 (rel. April 16, 2001) (*Verizon Massachusetts Order*).

[10] *UNE Remand Order, ¶431.*

CLEC requesting the audit would bear the cost of the audit, including any cost by Qwest to provide a "special data extraction." We deny Qwest's request for reconsideration of paragraph 35 of the *28th Supplemental Order.*

2. WA DF-2: Application of Local Usage Restriction to Unbundled Dark Fiber

29 This issue is discussed above in paragraphs 11-19. We grant Qwest's petition for reconsideration on this issue and reverse, in part, our decision in paragraph 54 of the *28th Supplemental Order*, and determine that the FCC's local usage restriction applies only to dark fiber facilities used as EELs. We approve Qwest's proposed SGAT language on this issue.

3. WA NID-2(b): Disconnection of Qwest Facilities at the NID

30 During the workshops, AT&T requested that Qwest make space available on the NID, when there is no space available, by disconnecting or removing its unused facilities from protectors, and capping off or tying up the removed facilities. The *20th Supplemental Order* required Qwest to modify the SGAT to allow qualified CLEC personnel to disconnect Qwest facilities consistent with industry practices provided by AT&T. *20th Supplemental Order at ¶238.* The Commission upheld this decision in the *28th Supplemental Order* and directed Qwest to modify the SGAT to include additional language proposed by AT&T. *28th Supplemental Order at ¶80.*

31 **Qwest:** Qwest disagrees with the Commission's decision in paragraph 80 of the *28th Supplemental Order*, but will accept the decision if the Commission makes "a slight modification." *Qwest's 4th Workshop Petition at 15-16.* Qwest requests that CLECs provide Qwest notice "if and when the CLEC disconnects Qwest's facilities from the protector field." *Id. at 15.* Qwest submits a proposed modification to SGAT section 9.5.2.5, as set forth in paragraph 80 of the *28th Supplemental Order. Id. at 15-16.* Qwest asserts that the change is necessary to allow it "to properly inventory the facility and the responsible party." *Id. at 15.*

32 **AT&T:** AT&T objects to Qwest's proposed language. First, AT&T argues that the proposed language does not make sense in context with the language required by paragraph 80 of the *28th Supplemental Order. AT&T Response at 16.* AT&T argues that a CLEC would not be disconnecting Qwest facilities from the protection device, but securing the Qwest facility on a protection site. *Id.* Second, AT&T argues that Qwest's proposed notice requirement would require CLECs to establish costly procedures, and that it is unclear whether Qwest really needs the information to protect the consumer. *Id. at 16-17.*

33 **Discussion and Decision:** Qwest's proposed modification to SGAT section 9.5.2.5 is reasonable, as it will allow Qwest to maintain proper records of its facilities.

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Executive Director – Federal Regulatory

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ride the light
Qwest.

July 12, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: *Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota*, Docket No. 02-148

Dear Ms. Dortch:

In response to a request from the staff of the Department of Justice for information regarding manual service order accuracy, Qwest hereby submits the summary data tables that were provided. An error was discovered in para. 356 of the Notarianni Declaration. The paragraph included the results of an internal audit on application date accuracy. The numbers included, however, were based on an early sample that had included both flow-through and manually-processed orders instead of a sample that included only manually-processed orders. Attached is the corrected table with additional detail as to the size of the samples is attached.

The twenty-page limit does not apply as set forth in DA 02-1390.

Sincerely,

Hance Haney

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
K. Brown

Non Design Service Order Audit - Summary (Resale POTS)

Month	# Orders Sampled	Valid APP (Total)	Incorrect APP (Total)	APP Accuracy (All Misses)
Mar-02	226	217	9	96.0%
Apr-02	195	193	2	99.0%

Non Design Service Order Audit - Summary (UNE-P POTS)

Month	# Orders Sampled	Valid APP (Total)	Incorrect APP (Total)	APP Accuracy (All Misses)
Mar-02	146	142	4	97.3%
Apr-02	138	136	2	98.6%

Non Design Service Order Audit - Summary (Resale and UNE-P POTS)

Month	# Orders Sampled	Valid APP (Total)	Incorrect APP (Total)	APP Accuracy (All Misses)
Mar-02	372	359	13	96.5%
Apr-02	333	329	4	98.8%

Design Service Order Audit - Summary (Unbundled Loop)

Month	# Orders Sampled	Valid APP (Total)	Incorrect APP (Total)	APP Accuracy (All Misses)
Mar-02	383	376	7	98.2%
Apr-02	365	363	2	99.5%

R. Hance Haney
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July 18, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: *Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota*, Docket No. 02-148

Dear Ms. Dortch:

In response to a request from the staff of the Department of Justice for information regarding manual service order accuracy, Qwest hereby submits the attached information.

The twenty-page limit does not apply as set forth in DA 02-1390.

Sincerely,

Hance Haney

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
J. Jewel
P. Baker
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P. Fahn
B. Smith
K. Brown

The Jul 10 and Jul 12 ex partes contain basically the same information formatted differently. The Jul 12 version provided separate tables and included the actual numbers for service orders with correct and incorrect application dates. The Jul 10 version presented the information in one table and included only the total number of service orders sampled and the percentage that were accurate.

The sample size for these internal audits was determined using normal statistical formulas. The universe of orders were those included in the OP measure. The volumes by product type are shown in the following table.

	March	*April*	*May*
Resale	4,985	6,019	6,150
UNE-P POTS	8,218	8,234	5,028
Combined Resale/ UNE-P POTS	13,203	14,253	11,178
Unbundled Loop	15,189	9,353	TBD

These volumes were then fed into a formula that returned the sample size required to achieve a 95% confidence level with a plus/minus 5% margin of error.

The orders were manually selected at random by the auditing team. When possible, they included orders from each of the 14 states to account for any regional differences. For the first resale sample, some orders were removed resulting in a confidence level closer to 90%. The following table shows the number of orders sampled and the accuracy by month, including May results for the Resale and UNE-P POTS products.

	Mar-02		**Apr-02**		**May-02**	
	# Orders Sampled	**APP Accuracy**	**# Orders Sampled**	**APP Accuracy**	**# Orders Sampled**	**APP Accuracy**
Resale POTS	226	96.0%	195	99.0%	163	97.5%
UNE-P POTS	146	97.3%	138	98.6%	200	94.5%
Combined Resale POTS/ UNE-P POTS	372	96.5%	333	98.8%	363	95.9%
UBL	383	98.2%	365	99.5%	363	TBD

Non Design Service Order Audit - Summary
(Resale POTS)

Month	# Orders Sampled	Valid APP (Total)	Incorrect APP (Total)	APP Accuracy (All Misses)
Mar-02	226	217	9	96.0%
Apr-02	195	193	2	99.0%
May-02	163	159	4	97.5%

Non Design Service Order Audit - Summary
(UNE-P POTS)

Month	# Orders Sampled	Valid APP (Total)	Incorrect APP (Total)	APP Accuracy (All Misses)
Mar-02	146	142	4	97.3%
Apr-02	138	136	2	98.6%
May-02	200	189	11	94.5%

Non Design Service Order Audit - Summary
(Resale and UNE-P POTS)

Month	# Orders Sampled	Valid APP (Total)	Incorrect APP (Total)	APP Accuracy (All Misses)
Mar-02	372	359	13	96.5%
Apr-02	333	329	4	98.8%
May-02	363	348	15	95.9%

Design Service Order Audit - Summary
(Unbundled Loop)

Month	# Orders Sampled	Valid APP (Total)	Incorrect APP (Total)	APP Accuracy (All Misses)
Mar-02	383	376	7	98.2%
Apr-02	365	363	2	99.5%
May-02	363	TBD	TBD	TBD

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July 19, 2002

Ex Parte – REDACTED – FOR PUBLIC INSPECTION

BY HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St, S.W., TW-B204
Washington, D.C. 20554

Re: Application of Qwest Communications International Inc. To Provide In-region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota, Docket No. 02-148

Dear Ms. Dortch:

Yesterday Andrew Crain, Christie Doherty, Hance Haney, Loretta Huff, Nancy Lubamersky, Melissa Newman, Lynn Notarianni, Barry Orrel, Dan Poole, Charles Steese, Chris Viveros, Michael Williams, Peter Rohrbach, Linda Oliver, and Yaron Dori, all representing Qwest Communications International Inc. ("Qwest"), met with Michael Carowitz, Gail Cohen, Ty Cottrill, William Dever, Michael Engel, Ken Lynch, Jon Minkoff and Elizabeth Yockus of the Wireline Competition Bureau ("Bureau"). At the staff's request, Qwest provided information on various topics related to the above-referenced application, including wholesale service performance, wholesale service delivery, SATE, and billing. These matters are reflected in the attached documents that were given to staff at the meeting. Prior to this meeting Ms. Newman, Mr. Rohrbach and Todd Lundy of Qwest discussed regulatory matters concerning the so-called "unfiled agreements" issue raised by certain commenting parties with Michele Carey, Mr. Carowitz, Mr. Cottril, Mr. Dever and Ms. Yockus of the Bureau.

Pursuant to the Public Notice in this proceeding, Qwest is submitting an original and two copies of the redacted version of the documents provided to staff at the first of the two above-referenced meetings. Qwest separately is submitting

one copy of the confidential portion of such documents. These confidential portions are associated with attachments that follow pages 3 and 14 of the redacted submission. Six copies of the confidential and redacted versions of the documents also are being submitted to Gary Remondino of the FCC's Wireline Competition Bureau's Policy Division.

Qwest submits the enclosed documents with the understanding that they will be subject to the Protective Order in this proceeding. Inquiries regarding access to the confidential portion of these documents (subject to the terms of the Protective Order) should be addressed to the following:

C. Jeffrey Tibbels
Hogan & Hartson LLP
555 13th Street, N.W.
Washington, D.C. 20004
Tel: 202-637-6968
Fax: 202-637-5910

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions.

Respectfully submitted,

Yaron Dori

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
J. Prisbey

EX PARTE
July 18, 2002

SECTION 271 APPLICATIONS FOR COLORADO, IDAHO, IOWA, NEBRASKA & NORTH DAKOTA

Question

Elaborate on the auditability of CLEC bills, and provide a sample CLEC bill.

Answer

Qwest's CRIS bill formats provide monthly services information necessary for purposes of verification. The electronic versions of this bill can be loaded into a variety of commercially available software packages, such as Microsoft Excel or Microsoft Access, to support electronic manipulation of the information for bill validation purposes. As listed in paragraph 498 of the Notarianni/Doherty ("OSS") Declaration, there are three primary electronic formats from which a CLEC can select – ASCII, EDI or BOS. As of April 2002, 70 CLECs received ASCII formatted bills, the most popular choice.[1] Nine CLECs were receiving EDI formatted bills. One CLEC chose to move to a BOS format for services provided in June 2002 and going forward.

The ASCII version of the bill is a delimited file that is easily transferred to a variety of applications supporting file manipulation. Attachment 1 provides the specific steps that would be followed to do such a conversion, as well as outlining probable queries or reports that would be helpful in doing the actual validation. As part of work being done to analyze a CMP Change Request, Qwest received an example of an actual ASCII CLEC bill that had been converted to Excel for just such analysis purposes, demonstrating that CLECs are electronically manipulating and auditing their bills. Attachment 2 provides printouts from that bill that illustrate the detail provided at a summary account level and also demonstrate the visibility of the USOCs at the individual end-user account level.

For EDI versions of the bills, the billing information would need to be converted, just like the ASCII bill, using commercially available software or the auditing function must be inherent in the CLEC system that receives the EDI bill. The software products used to assist in converting the EDI formatted information are not billing software per se. Rather they are "integrator" or "translator" software that can be used to convert the EDI-formatted billing information provided by Qwest into the software selected by the CLEC for auditing purposes.

For the BOS version of the UNE-P bill, Qwest mapped the existing CRIS data to the BOS format using the industry guidelines for that format as its guide. Qwest has published to CLECs a document referred to as the "Access Billing

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[1] Notarianni/Doherty ("OSS") Declaration, ¶501

Differences" list. This document identified how Qwest had implemented the BOS industry guidelines for access services. The differences associated with UNE-P BOS differences have also been identified and shared with the CLECs. When a CLEC selects the BOS format, Qwest provides a test tape 30 days in advance of implementation. Qwest and the CLEC work together to resolve any issues identified. The first production BOS formatted bill was produced this month. No feedback has yet been received. Two additional CLECs have received test tapes in July.

As with any other system or process interface, the CLECs have the opportunity to submit change requests (CRs) through Qwest's Change Management Process (CMP). There are currently several CRs in process in the billing area. They are listed in Attachment 3.

* * *

The FCC has not required that a BOC provide bills in a BOS BDT format. The FCC has held that "a BOC must demonstrate that it provides competing carriers with wholesale bills in a manner that gives competing carriers a meaningful opportunity to compete." *In the Matter of Application of Verizon Pennsylvania, Inc, et al., for Authority to Provision of In-Region, InterLATA Services in Pennsylvania,* FCC 01-268, para. 15 (Sept. 19, 2001) ("*Verizon Pennsylvania 271 Order*"). In order to meet this criterion, "the BOC must demonstrate that it can produce a readable, auditable and accurate wholesale bill." *Verizon Pennsylvania 271 Order*, para. 22.

In its 271 orders, the FCC has continually held that it does not mandate a particular form of access to OSS, including compliance with industry standards. The FCC has held that "compliance with industry standards is not a requirement of providing nondiscriminatory access to OSS functions." *In the Matter of Application of BellSouth Corporation, et al., for Provision of In-Region, InterLATA Services in Lousianna,* FCC 98-271, para. 137 (October 13, 1998). The FCC has stated that adherence to OSS industry standards is "not a prerequisite." *In the Matter of Application of BellAtlantic New York, Inc, et al., for Authority to Provision of In-Region, InterLATA Services in New York,* FCC 99-404, para. 88; *see also In the Matter of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, to Provide In-Region, InterLATA Services in Michigan,* FCC 97-298, para. 217 (August 19, 1997).

The format of a BOC's billing output was discussed in the most detail in the *Verizon Pennsylvania 271 Order*. In that order, the FCC discussed the two forms of bills that Verizon provided to CLECs – a BOS BDT bill and a "retail-

formatted" bill. The retail-fomatted bill appeared in the same type of end-user format that a Verizon end-user customer would receive. *Verizon Pennsylvania 271 Order*, para. 17. While one footnote states that the BOS BDT format is "important" *(Verizon Pennsylvania 271 Order)*, that comment was made in the context of clear evidence that Verizon's retail-formatted bills were not auditable. The FCC stated that "the distinguishing feature of Verizon's retail-formatted bill is that it cannot be easily transferred to a computer spreadsheet or other electronic system that allows for computer auditing." *Verizon Pennsylvania 271 Order*, fn. 51; *see also In the Matter of Application of Verizon Pennsylvania, Inc, et al., for Authority to Provision of In-Region, InterLATA Services in New Jersey*, FCC 02-189, para. 15 (June 24, 2002).

Unlike Verizon's retail-formatted bill, Qwest provides CLECs bills in an EDI format that can be easily transferred to computer spreadsheets or other electronic systems that allow for computer auditing. Therefore, Qwest's EDI bills meet the standard that its bills are auditable. The fact that those bills are being provided in an EDI format, rather than a BOS BDT format, is immaterial. The only issue is whether the bills provided by Qwest meet the FCC's standard of auditabiltiy. Qwest has demonstrated that CLECs can audit their bills by transferring Qwest's EDI bills into spreadsheets. The fact that Qwest's bills are auditable is further demonstrated by the fact that KPMG was able to audit Qwest's bills during the ROC OSS test and the fact that no CLEC raised auditability of Qwest's bills as an issue during the workshops on Qwest's application or during the ROC OSS test.

Attachment 1:

Detailed Bill Audit Process

Summary Steps to Prepare for Validation of ASCII Bills:

1. Receive ASCII bill from Qwest
2. Extract individual bill section(s) to audit/validate (see Procedure A for detailed procedures)
3. Import bill section(s) into desired validation tool/application (see Procedures B & C for detailed procedures)
4. Create queries/macros/filters/etc. to assist in the validation (see Procedure D for sample suggestions)
5. Perform validation

Summary Steps to Prepare for Validation of EDI Bills:

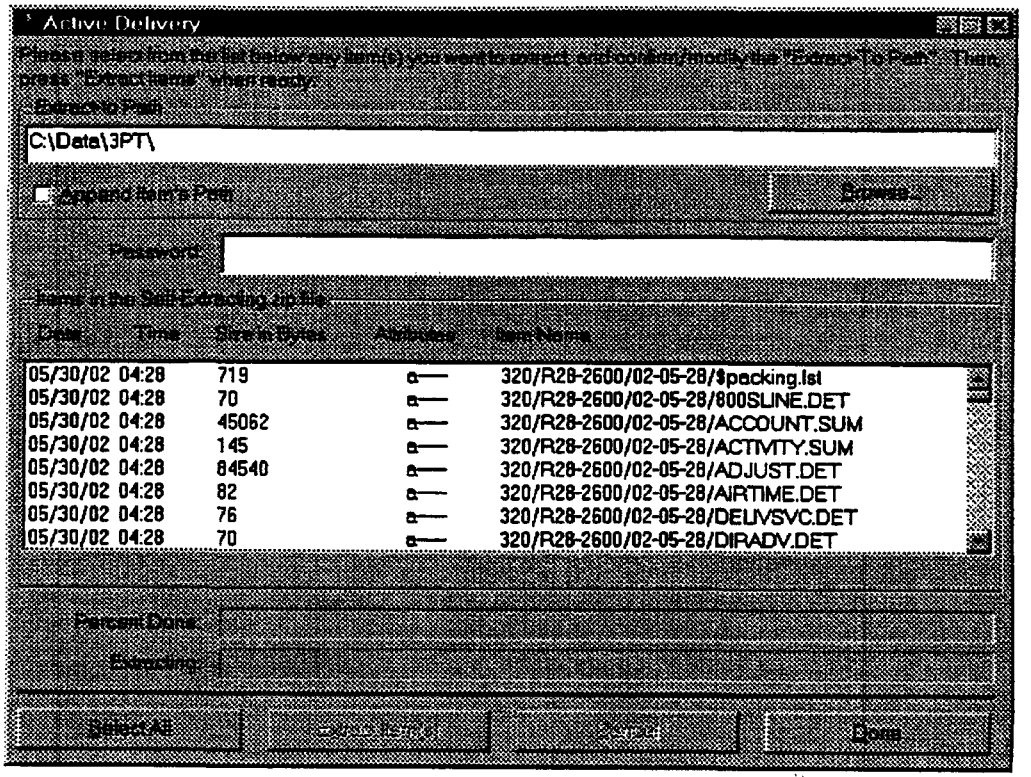
1. Receive EDI bill from Qwest
2. Convert EDI to text format using standard 'Integrator/Translator' tools
3. Import text format bill section(s) into desired validation tool/application (see Procedures B & C for detailed procedures)
4. Create queries/macros/filters/etc. to assist in the validation (see Procedure D for sample suggestions)
5. Perform validation

NOTE: Depending upon the specific validation tool/application used, steps 3, 4, and 5 (above) could be very similar processes regardless of whether the electronic bill was received in ASCII or EDI format. Therefore, Procedures B & C are the same for both electronic formats.

Procedure A (Extracting ASCII Files)

CLECs may receive an electronic ASCII bill file from Qwest. The following steps will allow the CLEC to prepare the ASCII file for further validation:

- The ASCII bill file will be sent as an "executable" type file. Execute/Run the file. Once run, the following Windows dialog screen will automatically appear on the user's PC (assuming a Windows operating system is being used):

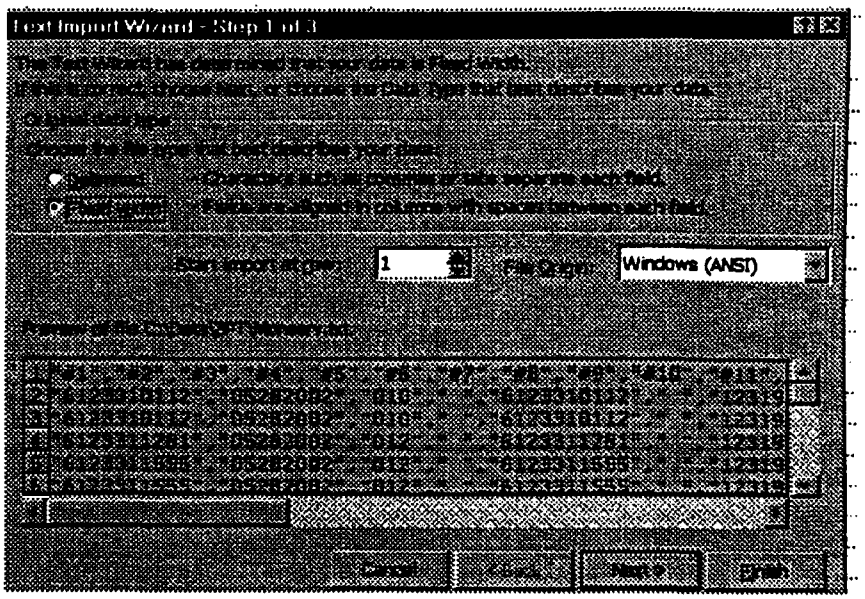


- This Windows dialog screen allows users to extract individual sections of each summary bill for future use. In order to extract the "Monthly Services Detail" section of a given summary bill (for example), select the item entitled "MONSERV.DET" (for the desired summary account number) and click on "Extract Item(s)"
- Repeat the previous step until all of the desired Monthly Services Detail bill files have been extracted. Once all files have been extracted, click "Done" and the dialog screen will close.

Procedure B (Importing Files into MS Excel)

Each CLEC will need to determine what software application to use in performing validation/audit efforts. If, for example, MS Excel is the chosen application, the steps outlined in this procedure could be followed. If, on the other hand, MS Access was the chosen application, the steps outlined in Procedure C could be followed.

- Start/Run MS Excel
- Select File…Open from the menu bar and open the file extracted during Procedure A. When opening the desired file, the following Text Import Wizard will appear:



- The beginning of the file should appear in this Text Import Wizard
- Click the radio button for Delimited file
- Click on the "NEXT" button
- Click the radio button for the type of delimiter used in this file
- Click on the "NEXT" button
- For each column of data, select the appropriate data format
- Click on the "FINISH" button
- At this point, all of the data will be converted into MS Excel format for any further analysis

Procedure C (Importing Files into MS Access)

If MS Access was the chosen validation/auditing application, the steps outlined in this procedure could be followed. For any type of repetitive activities within MS Access, it is recommended to develop a Macro to ensure the same sequence of events and standardization of fields and field names.

The first step to creating an Import Macro would be to define an IMPORT SPECIFICATION. To complete this, perform the following:

- Launch Microsoft Access
- Click on the "Tables" tab
- Click on the "NEW" button
- Click on the "IMPORT TABLE" option in the text box.
- Click on the "OK" button
- Locate the text file you wish to import. (ensure Type of Files = Text)
- Click on the file name to highlight file name.
- Click on the "IMPORT" button.
- The beginning of the file should appear in a new window.
- Click the radio button for Delimited file.
- Click on the "NEXT" button
- Click the radio button for the type of delimiter used in this file.
- If the first row of the file contains headings, set the Check box for "First Row Contains Column Headings"
- Click on the "NEXT" button
- Click the radio button for "IN A NEW TABLE"
- For each column: Click on the column and fill in FIELD NAME, FIELD TYPE, INDEX, or Do not import.
- Click on the "NEXT" button (after all columns have been defined)
- Click the radio button for "LET ACCESS ADD PRIMARY KEY" (recommended)
- Click on the "NEXT" button
- Click on the "ADVANCED" button
- Click on the "SAVE AS" button
- Type in a User Friendly Specification Name
- Click on the "OK" button.

- Once the Import Specification is defined, you can build an Import Macro. The import Macro will allow you to load files into a table at the click of the mouse.

Procedure D (Sample Queries/Reports for Validation)

Once the electronic bill files are loaded into MS Excel/MS Access/etc., CLECs can design/develop queries, filters, and/or reports to facilitate specific auditing and reconciliation needs.

Some suggested topics are:

- Totals by USOC – Select and Count unique USOCs - This query could be used to render a summarized (1 line per USOC) count of USOCs in your detail section/table. This can be tied back to the summary sections of your bill showing quantities. If prices can vary on an individual USOC, the unit price can be added to gain pricing information to tie back to charges on the bill.

- Totals by Account/Billing Telephone Number (BTN)/Working Telephone Number (WTN) – To track charges incurred for a particular customer – This query can render an end-user summary that will either itemize or summarize USOCs and Charges for a given Account/BTN/WTN.

- Monthly additions/deletions – Compare current month to last month – This query can render a discrepancy list to help identify which USOCs are new to your bill (additions) and which USOCs have been removed from your bill (deletions). This can assist in monitoring customer activity.

Attachment 2:

Detailed Bill Audit Process

As described in the main document, the attached sheets were printed from an actual Qwest ASCII bill that was provided to a CLEC, converted to Excel by the CLEC, and then returned to Qwest for analysis. The phone numbers listed have been modified to protect confidentially.

The first section of the bill is the summary information. This is most easily identified by the BTN. which ends in K for the summary account level information. Immediately following the summary information the individual account information begins.

The first end-user account number is 303202141666 2. This particular account number is repeated on four lines. The first three lines display the individual USOCs (NPU, LMB, PORXX) for this account in the column labeled "USOC" and the associated rate in the column labeled "Amt". The fourth line is a summary of the information for that customer and displays the bill period start and end dates in columns G and H and the total for the rates in the "Amt" column.

As described in attachment 1, a variety of different reports or queries can then be generated from this data to suit the needs and desires of each individual CLEC.

Colorado Qwest Billmate-Monserve (partial file due to large size of file)

BTN	Date		Dept Code	WTN	Clt ID			Quant	USOC	Descr					Amt		
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16	#17	#18
303[redacted]K	11012001	1000				0	0	108	RXB	CTX21 ANLG STA LINE WITH	FEATURES-MONTH-TO-MONTH		0		0	0	0
303[redacted]K	11012001	1000				0	0	467	R4N	CTX FMLY NON-BLOCKED MAIN	STATION LINE, EACH		0		0	0	0
303[redacted]K	11012001	1000				0	0	12	SEA	LONG DISTANCE CALLING	RESTRICTION		0		0	0	0
303[redacted]K	11012001	1000				0	0	7546	SFJXM	SERVICE AND/OR EQUIPMENT			0		0	0	0
303[redacted]K	11012001	1000				0	0	2	SMDPS	SMDR PER SYSTEM			0		0	0	0
303[redacted]K	11012001	1000				0	0	2	SRG	LONG DISTANCE CALLING	RESTRICTION		0		0	0	0
303[redacted]K	11012001	1000				0	0	1	STP	INTERCONNECTING EQUIPMENT			0		0	0	0
303[redacted]K	11012001	1000				0	0	1	S2N	SERVICE AND/OR EQUIPMENT			0		0	0	0
303[redacted]K	11012001	1000				0	0	35	TFB	TRUNK-TWO WAY			0		0	0	0
303[redacted]K	11012001	1000				0	0	13	TFM	TRANSFER MAILBOX			0		0	0	0
303[redacted]K	11012001	1000				0	0	8	TY4C3	DID-DIGITAL-FLAT-COMBINATION-	36 MONTH		0		0	0	0
303[redacted]K	11012001	1000				0	0	24	TY5C5	DID-DIGITAL-FLAT-COMBINATION-	RESALE-60 MONTH		0		0	0	0
303[redacted]K	11012001	1000				0	0	46	T2DCX	DIGITAL TRUNK 2-WAY			0		0	0	0
303[redacted]K	11012001	1000				0	0	24	T2JCX	DID-DIGITAL-FLAT-COMBINATION			0		0	0	0
303[redacted]K	11012001	1000				0	0	1	USP1X	UNISTAR(R) MAINTENANCE PLAN			0		0	0	0
303[redacted]K	11012001	1000				0	0	1	VFN	VOICE MESSAGE NOTIFICATION			0		0	0	0
303[redacted]K	11012001	1000				0	0	1	VJMXU	CALL ROUTING SERVICE			0		0	0	0
303[redacted]K	11012001	1000				0	0	2	VPH	CALL ROUTING SERVICE			0		0	0	0
303[redacted]K	11012001	1000				0	0	11	WFA	800 SERVICELINE(SM) FEATURE			0		0	0	0
303[redacted]K	11012001	1000				0	0	2	XBAXT	CLASS OF SVC-FOREIGN EXCHANGE			0		0	0	0
303[redacted]K	11012001	1000				0	0	1	XBHXX	COMM SYS-CUST OWNED-FLAT			0		0	0	0
303[redacted]K	11012001	1000				0	0	4	X2NCX	TRANSMISSION PARAMETERS			0		0	0	0
303[redacted]K	11012001	1000				0	0	1	X2NFX	TRANSMISSION PARAMETERS			0		0	0	0
303[redacted]K	11012001	1000				0	0	4	X5G	CTX FMLY BLOCKED EXTENSION	STATION LINE, EACH		0		0	0	0
303[redacted]K	11012001	1000				0	0	9	ZCB1X	DISTANCE CHARGE			0		0	0	0
303[redacted]K	11012001	1000				0	0	7	ZCB2X	DISTANCE CHARGE			0		0	0	0
303[redacted]K	11012001	1000				0	0	1	1FA	COMPUTER LINE			0		0	0	0
303[redacted]K	11012001	1000				0	0	420	1FB	PRIVATE BUSINESS LINE			0		0	0	0
303[redacted]K	11012001	1000				0	0	3	1L5XB	TRANSPORT FACIL-PER MILE			0		0	0	0
303[redacted]K	11012001	1000				0	0	3	1MB	PRIVATE BUSINESS LINE			0		0	0	0
303[redacted]K	11012001	1000				0	0	9	1TM	STAND-BY LINE			0		0	0	0
303[redacted]K	11012001	1000				0	0	44	3BL	3 WAY CALLING BLOCKING			0		0	0	0
303[redacted]K	11012001	1000				0	0	21	3LBXA	TRANSPORT CHANNEL - PER MILE	RATE		0		0	0	0
303[redacted]K	11012001	1000				0	0	13	3LBXB	TRANSPORT CHANNEL - PER MILE	RATE		0		0	0	0
303[redacted]K	11012001	1000				0	0	31	3LBXC	TRANSPORT CHANNEL - PER MILE	RATE		0		0	0	0
303[redacted]K	11012001	1000				0	0	115	6APPK	CALL HOLD			0		0	0	0
303[redacted]K	11012001	1000				0	0	133	6SY	CALL WAITING - ALL CALLS			0		0	0	0
303[redacted]K	11012001	1000				0	0	2607	69H	CALL FORWARD - DON'T ANSWER			0		0	0	0
303[redacted]K	11012001	1000				0	0	3229	69J	CALL FORWARD - BUSY- ALL CALLS			0		0	0	0
303[redacted]K	11012001	1000				0	0	119	9LM	FEDERAL ACCESS CHARGE			0		0	0	0
303[redacted]K	11012001	1000				0	0	7	9PZF1	FEDERAL UNIVERSAL SERV FUND			0		0	0	0
303[redacted]K	11012001	1000				0	0	24	9PZLC	FEDERAL UNIVERSAL SERV FUND			0		0	0	0
303[redacted]K	11012001	1000				0	0	783	9PZLX	FEDERAL UNIVERSAL SERV FUND			0		0	0	0
303[redacted]K	11012001	1000				0	0	887	9ZR	FEDERAL ACCESS CHARGE			0		0	0	0
303[redacted]K	11012001	1000				0	0	43	999AL	SERVICE AND/OR EQUIPMENT			0		0	0	0
[redacted]2	11012001	0		[redacted]		0	0	1	NPU	NON-PUBLISHED SERVICE			0		1 54	0	0
[redacted]2	11012001	0		[redacted]		0	0	1	LMB	MEASURED BUS LINE NO ALLOWANCE			0		15 22	0	0
[redacted]2	11012001	0		[redacted]		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0 43	0	0
[redacted]2	11012001					11012001	11302001								17 19	0	0
[redacted]2	11012001	0		[redacted]		0	0	1	NHNRN	RESERVATION OF NONSEQUENTIAL	DID NUMBER		0		0 13	0	0
[redacted]2	11012001	0		[redacted]		0	0	1	NHNRN	RESERVATION OF NONSEQUENTIAL	DID NUMBER		0		0.13	0	0

Attachment 3:

CMP Billing Change Requests

Following is a list of CLEC-submitted change requests associated with billing.

5043176 – Better explanations of OCCs on Invoices
Date Submitted: 08/31/00
Submitted by: Eschelon
Status: Evaluation

5328167 – Request that loop orders be billed on a CABS bill.
Date Submitted: 01/08/01
Submitted by: Rythyms
Status: Development

SCR042902-01 - Use CLEC internal repair ticket number on the CLEC bill to identify maintenance and repair charges.
Date Submitted: 04/29/02
Submitted by: Eschelon
Status: Evaluation

SCR053002-03 - Show total monthly charges and OCC charges for summary accounts. (to be closed per Sprint, which opened the request)
Date Submitted: 05/30/02
Submitted by: Sprint
Status: Presented

SCR060402-04 - Add circuit ID and date of Qwest dispatch to BillMate bill.
Date Submitted: 06/04/02
Submitted by: Eschelon
Status: Clarification

SCR061802-02 - Separate Local Interconnection MOU from Shared Transport on Billmate bills.
Date Submitted: 06/18/02
Submitted by: Eschelon
Status: Clarification

SCR061902-01 - Add CLLI code to each account for UNE-P and UNE-Loop accounts.
Date Submitted: 06/19/02
Submitted by: Eschelon
Status: Clarification

Question

Describe the relationship between unbundled loop disconnect orders in Colorado and Idaho and resale bill completeness.

Elaborate on the causes of billing adjustments in Nebraska and their impact on billing accuracy.

Answer

BI-4A results in Colorado and Idaho

As described in paragraph 559 of the Notarianni/Doherty ("OSS") Declaration, in February Qwest identified that a small percentage of the total order base tended to not be completed under the existing service order completion process. This issue was specific to unbundled loop disconnect orders issued as part of a conversion of an end-user to Qwest Retail. Because these orders are written by Retail but apply to a Wholesale account, the process in place at the time did not clearly identify which organization had responsibility for completing these orders.

Once this issue was identified, a project was initiated to identify and complete these orders. As would be expected, the vast majority of these orders had missed the first appropriate bill cycle and therefore counted against Qwest in the bill completeness measure BI-4A.

In addition to completing the orders that had been caught in this gap, the existing process was clarified to assign responsibility for completing these types of orders. These orders can be identified by sales code and a report is now provided to the responsible center on a daily basis for manual completion. With order completion responsibilities clarified and the daily report, these orders will be completed on a timely basis eliminating the negative impact they were having on BI-4A.

BI-3A results for Nebraska

Two issues impacted these results.

As part of Qwest's ongoing effort to determine the reasons underlying the BI3A results in some states, Qwest found that it had been calculating the BI3A PID incorrectly for mechanized adjustments, i.e., those that were performed through automated processes rather than by service center personnel.

For these automated adjustments, the billing system counts both a credit and a debit -- a credit to the CLEC for the rate that was billed incorrectly and a debit for the correct rate, the difference of which is the actual amount adjusted. When the adjustment is extracted from the billing system for BI-3A reporting purposes,

however, the reporting program incorrectly included both the removal of the incorrect rate and the addition of the correct rate as a total error rather than just reporting the amount adjusted due to error.

To better explain this phenomenon, it is helpful to take an example from one CLEC's January bill in Nebraska. In January 2002, the rate validation process (as described at ¶ 545 of Qwest's OSS declaration) identified an error in the CRIS tables for a particular CLEC that required the table to be modified and an adjustment issued. Specifically, the process found that a DS1 facility (USOC: D7W) that should have billed a monthly charge of $206.03 was instead being billed at $273.70. It was further discovered that this DS1 had been misbilled from November 1, 2001 to December 31, 2001.

The adjustment made on the CLECs bill was in the form of a credit of $135.34, and was calculated by multiplying the correct rate by 2 months, and subtracting from that the product of the correct rate multiplied by 2 months The actual calculation for the bill adjustment was:

(203.03 x 2) - (273.70 x 2) = -$135.34

and the dollar value of the adjustment reflected in the BI3A PID should be $135.34, and calculated as:

ABSV[(203.03 x 2) + (-273.70 x 2)] = $135.34.

However, because of the logic error, the actual dollar adjustment reflected in the BI3A PID was incorrectly calculated as $959.46, by using an incorrect formula:

ABSV(203.03 x 2) + ABSV(-273.70 x 2) = $959.46

A second illustration in Nebraska is one CLEC having been charged incorrectly for Alternate Answer – Busy Line (USOC: MVPBC) on a couple of its resale lines – another example of a table error identified by the rate validation project. The correct rate for this feature is $4.85 per month, but the CLEC was being charged $4.90, and had been misbilled from November 1, 2001 until the rate was changed on January 3, 2002. The actual adjustment issued was a credit for twenty one cents ($.21), and was calculated as:

(4.85 x 2.1) x 2 – (4.90 x 2.1) x 2 = -(.21), where 2.1 equals the number of months the MVPBC features were misbilled and 2 equals the number of MVPBC USOCs that were misbilled.

However the PID reflected an adjustment of $40.95 and was calculated incorrectly as:

ABSV(4.85 x 2 x 2.1) + ABSV(-4.90 x 2 x 2.1) = $40.95.

Based upon the recalculation methodology described in this document, the recomputed January BI3A would show that results in three states – including Nebraska – that were not at parity when the results were originally posted, would exceed parity when calculated using the correct formula. Therefore, in January, the measure was not calculated as intended and inappropriately indicated a lack of parity.

The second issue, which impacted the Nebraska February BI-3A results, was a customer dispute. A CLEC opened a billing dispute with Qwest regarding an unbundled loop rate. Through the dispute process, Qwest agreed with the CLEC's claim, corrected the rate and adjusted the CLEC's bill. The adjustment for this single CLEC was large enough to cause Qwest to miss the parity standard. In this case the PID performed as designed and a lack of parity was appropriately reported.

Question

Identify the number of manually processed orders that receive non-fatal error responses.

Answer

The table below displays the number of manually-handled LSRs that received a non-fatal error notice from January through May 2002. These numbers represent from approximately three-quarters of a percent to less than three percent of the total volume of manually-handled LSRs.

	Jan-02	Feb-02	Mar-02	Apr-02	May-02
CO	149	157	104	157	171
IA	74	111	76	101	120
ID	12	13	5	9	13
ND	20	32	25	21	26
NE	31	22	23	13	12
5 State Total	286	335	233	301	342

Question

Identify the number of one-on-one sessions involving training coaches to address errors found on service orders; describe one or two examples of trend-spotting by coaches and the follow-up action items that resulted; and provide documentation regarding application date accuracy for both manual and flow-through orders.

Answer

For the months of May-June '02, Qwest conducted 182 one-on-one review sessions to address errors found on service orders. Two examples of types of common errors found and the actions taken to address those errors are provided here.

Qwest center managers (coaches) identified issues with the completion of all required fields on complex resale orders. Individual order typists received one-on-one coaching regarding this issue. In addition, the process specialist for this area was alerted and issued a general notice, known as a Multi-Channel Communicator or MCC, to the center employees, both coaches and typists. This MCC, like all MCCs, was reinforced in team meetings by the coaches with the typists. Qwest's process specialists identified an issue with the population of the PON field on complex resale orders. The process specialists determined that the occurrences of this issue warranted that training be conducted for the Complex Resale typing team. The process specialists made arrangements with the Sr. Corporate Trainer to conduct a complex resale refresher-training course for the entire typing team during the month of June.

An additional request was for the application date accuracy information provided to the DOJ. The following table provides the latest information that was provided to the DOJ concerning application date accuracy. This updated table, modified to include May data for Resale POTS and UNE-P POTS, was filed on 7/17/02.

	Mar-02		Apr-02		May-02	
	# Orders Sampled	APP Accuracy	# Orders Sampled	APP Accuracy	# Orders Sampled	APP Accuracy
Resale POTS	226	96.0%	195	99.0%	163	97.5%
UNE-P POTS	146	97.3%	138	98.6%	200	94.5%
Combined Resale POTS/ UNE-P POTS	372	96.5%	333	98.8%	363	95.9%
UBL	383	98.2%	365	99.5%	363	TBD

Question

Describe Qwest's own audit of application date accuracy.

Answer

The application date is a key field on a service order. Qwest began an internal audit of the accuracy of this field in January 2002. The initial audit included both flow-through and manually-processed LSRs. In March 2002 the scope of the audit was modified to focus on manually-processed orders. Beginning with June data, the application date will be one of several fields evaluated for accuracy under a new service order accuracy PID, PO-20.

The basic guidelines for determining the accuracy of the application date can be found in the Application Date definition in the "Definition of Terms" section of the 14 State 271 Working PID Version 5.0. The definition addresses issues such as determining the application date for LSRs received late in the day and over the weekend. The audit team also took into account situations where an LSR is received after the defined cut-off time but is still processed on the date of receipt.

The sample size for these internal audits was determined using normal statistical formulas. The universe of orders were those included in the OP measures. The volumes by product type are shown in the following table.

	March	April	May
Resale	4,985	6,019	6,150
UNE-P POTS	8,218	8,234	5,028
Combined Resale/ UNE-P POTS	13,203	14,253	11,178
Unbundled Loop	15,189	9,353	TBD

These volumes were then fed into a formula that returned the sample size required to achieve a 95% confidence level with a ±5% margin of error.

The orders were selected at random by the auditing team. When possible, they included orders from each of the 14 states to account for any regional differences. For the first resale sample, some orders were removed resulting in a confidence level closer to 90%. The following table shows the number of orders sampled and the accuracy by month, including May results for the Resale and UNE-P POTS products.

	Mar-02		Apr-02		May-02	
	# Orders Sampled	APP Accuracy	# Orders Sampled	APP Accuracy	# Orders Sampled	APP Accuracy
Resale POTS	226	96.0%	195	99.0%	163	97.5%
UNE-P POTS	146	97.3%	138	98.6%	200	94.5%
Combined Resale POTS/ UNE-P POTS	372	96.5%	333	98.8%	363	95.9%
UBL	383	98.2%	365	99.5%	363	TBD

Question

Provide the number of CLECs submitting orders via GUI and via EDI.

Answer

The following chart contains the number of CLECs who submitted orders via IMA EDI and GUI by state for the five states in the June 13, 2002 filing for the time period from May 2001 through April 2002. These numbers were included in the Notarianni/Doherty OSS Declaration in the June 13, 2002 filing at footnotes 221 and 234 for EDI and the GUI respectively.

STATE	EDI CLECs	GUI CLECs
Colorado	**16**	**49**
Iowa	**8**	**27**
Idaho	**4**	**15**
North Dakota	**5**	**15**
Nebraska	**8**	**16**

R. Hance Haney
Executive Director – Federal Regulatory

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ride the light
Qwest.

July 12, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: *Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota*, Docket No. 02-148

Dear Ms. Dortch:

In response to a request from the staff of the Department of Justice for information regarding local service requests ("LSRs") that were rejected in error, Qwest hereby submits the data that was provided.

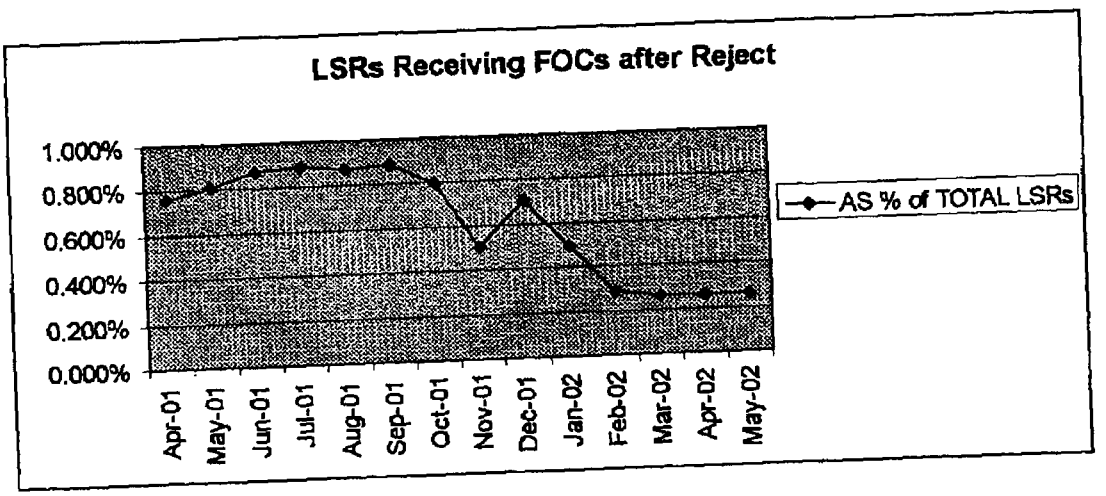
The twenty-page limit does not apply as set forth in DA 02-1390.

Sincerely,

Hance Haney

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
K. Brown

MONTH	# LSRs FOC'd AFTER REJECTED	TOTAL LSRs	% of TOTAL
April-01	774	102,033	0.759%
May-01	912	112,970	0.807%
June-01	926	105,763	0.876%
July-01	937	104,897	0.893%
August-01	1134	129,570	0.875%
September-01	852	96,404	0.884%
October-01	942	117,903	0.799%
November-01	766	151,930	0.504%
December-01	792	112,255	0.706%
January-02	726	146,070	0.497%
February-02	388	136,138	0.285%
March-02	368	140,321	0.260%
April-02	419	163,638	0.260%
May-02	417	157,413	0.260%



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445 12th Street, S.W., TW-B204
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Re: *Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota*, Docket No. 02-148

Dear Ms. Dortch:

In response to a request from Commission staff, Qwest is providing information regarding: (1) LSRs that IMA determines are flow-through eligible ("FTE"); (2) FTE LSRs that the Flow-Through System ("FTS") submits to the Service Order Processor ("SOP"); (3) Manually processed LSRs that are rejected by the SOP; and (4) Manually processed LSRs that are immediately rejected by the Service Delivery Coordinators ("SDCs").

The twenty-page limit does not apply as set forth in DA 02-1390.

Sincerely,

Hance Haney

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith

Qwest Response to FCC Request for Supplemental Data

FCC Request (6/28/02)

For each state in the ROC I filing, provide a table with CLEC-specific information for the following:

1. LSRs that IMA determines are flow-through eligible ("FTE");

2. FTE LSRs that the Flow-Through System ("FTS") submits to the Service Order Processor ("SOP");

3. Manually processed LSRs that are rejected by the SOP;

4. Manually processed LSRs that are immediately rejected by the Service Delivery Coordinators ("SDCs").

Sample tables provided by the FCC are attached.

Qwest Response (7/12/02)

The attached tables are responsive to requests 1, 2 and 4. Source date for each table can be found below. Also attached are pages from Qwest's Wholesale Website describing, in connection with Table 4, the circumstances under which manually processed LSRs are rejected by the SDCs. That information can be found beginning on page 12 of the attachment. Qwest does not possess the data necessary to respond to request 3 because it does not track the number of times a Qwest Service Center representative submits an order before it is accepted.

Assumptions for All Tables

- The timeframe to be included is aggregated for Jan – Apr 2002.
- All products should be aggregated together.
- Universe is orders submitted via IMA-GUI and IMA -EDI.

Table 1: Source Data

- Total Volume of Submitted LSRs = Denominator of PO-2A
- No. of electronically submitted LSRs that IMA finds FLE = Denominator of PO-2B
- % of Total = Denominator of PO-2B/ Denominator of PO-2A

Table 2: Source Data

- Total Volume = Denominator of PO-2B
- No. of FLE LSRs that flow through to SOP = Numerator of PO-2B
- % of Total = Numerator of PO-2B/ Denominator of PO-2B

Table 4: Source Data

- Total Volume LSRs placed in manual queue = Sum of PO-4A-1 and PO-4B-1 Denominators, excluding those LSRS that were rejected at the BPL Layer and selecting by state code, less the PO-2A numerator, modified to include line sharing orders that flow through but are not normally included in PO-2A
- No. of LSRs SDCs immediately reject = Sum of Denominators of PO-3A-1 and PO-3B-1
- % of Total = No. of LSRs SDCs immediately reject/ Total Volume LSRs place in manual queue

Breakdown of LSRs that IMA determines are FLE
(10 Tables Total)

#1

EDI LSRs - Colorado			
CLEC Name	Total Volume of sumbitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
CLEC 4	855	715	83.63%
CLEC 5	3428	1919	55.98%
CLEC 12	2141	1362	63.62%
CLEC 17	4	3	75.00%
CLEC 23	10387	6666	64.18%
CLEC 27	448	95	21.21%
CLEC 29	451	290	64.30%
CLEC 31	3055	2750	90.02%
CLEC 32	4	4	100.00%
CLEC 36	799	706	88.36%
CLEC 37	2	2	100.00%
CLEC 39	19175	13201	68.84%
CLEC 40	1	1	100.00%
CLEC 79	1		0.00%

#2

EDI LSRs - Iowa			
CLEC Name	Total Volume of sumbitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
CLEC 23	8496	3817	44.93%
CLEC 29	210	120	57.14%
CLEC 32	6	5	83.33%

#3

EDI LSRs - Idaho			
CLEC Name	Total Volume of sumbitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
CLEC 23	4935	3597	72.89%
CLEC 29	143	98	68.53%

#4

EDI LSRs - North Dakota			
CLEC Name	Total Volume of sumbitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
CLEC 23	1396	634	45.42%
CLEC 29	27	15	55.56%

#5

EDI LSRs - Nebraska			
CLEC Name	Total Volume of sumbitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
CLEC 23	6476	4937	76.24%
CLEC 29	88	62	70.45%
CLEC 32	4	4	100.00%

Breakdown of LSRs that IMA determines are FLE
(10 Tables Total)

#6

GUI LSRs - Colorado			
CLEC Name	Total Volume of sumbitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
CLEC 1	42	10	23.81%
CLEC 2	2090	683	32.68%
CLEC 3	29	25	86.21%
CLEC 5	26	23	88.46%
CLEC 6	5	2	40.00%
CLEC 8	3		0.00%
CLEC 9	2	2	100.00%
CLEC 10	2	2	100.00%
CLEC 11	343	300	87.46%
CLEC 12	197	82	41.62%
CLEC 13	137	123	89.78%
CLEC 14	57	44	77.19%
CLEC 15	2575	2362	91.73%
CLEC 16	601	302	50.25%
CLEC 17	107	73	68.22%
CLEC 19	355	269	75.77%
CLEC 21	3123	2357	75.47%
CLEC 22	4		0.00%
CLEC 23	1352	812	60.06%
CLEC 24	91	8	8.79%
CLEC 25	31	21	67.74%
CLEC 26	10809	8154	75.44%
CLEC 27	97	27	27.84%
CLEC 28	609	467	76.68%
CLEC 29	19	1	5.26%
CLEC 30	4907	4301	87.65%
CLEC 31	268	243	90.67%
CLEC 33	3		0.00%
CLEC 34	250	128	51.20%
CLEC 35	1		0.00%
CLEC 37	445	364	81.80%
CLEC 38	331	263	79.46%
CLEC 39	3428	2241	65.37%
CLEC 41	16	3	18.75%
CLEC 42	111	1	0.90%
CLEC 43	414	46	11.11%
CLEC 44	1	1	100.00%
CLEC 45	79	63	79.75%

#7

GUI LSRs - IOWA			
CLEC Name	Total Volume of sumbitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
CLEC 46	33	22	66.67%
CLEC 47	3	2	66.67%
CLEC 48	38	28	73.68%
CLEC 9	4327	3935	90.94%
CLEC 49	788	581	73.73%
CLEC 50	1131	887	78.43%
CLEC 11	191	173	90.58%
CLEC 51	414	245	59.18%
CLEC 52	66	19	28.79%
CLEC 53	2147	1747	81.37%
CLEC 16	357	170	47.62%
CLEC 54	347	235	67.72%
CLEC 55	105	97	92.38%
CLEC 56	388	267	68.81%
CLEC 57	124	83	66.94%
CLEC 23	591	236	39.93%
CLEC 25	1	1	100.00%
CLEC 29	3		0.00%
CLEC 58	133	75	56.39%
CLEC 30	4444	4025	90.57%
CLEC 59	1	1	100.00%
CLEC 60	1140	870	76.32%
CLEC 61	110	73	66.36%
CLEC 62	21	5	23.81%
CLEC 45	11	9	81.82%
CLEC 61	110	73	66.36%
CLEC 62	21	5	23.81%
CLEC 45	11	9	81.82%

Breakdown of LSRs that IMA determines are FLE
(10 Tables Total)

#8

GUI LSRs - Idaho			
CLEC Name	Total Volume of sumbitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
CLEC 48	219	171	78.08%
CLEC 63	53	16	30.19%
CLEC 16	25	14	56.00%
CLEC 64	131	64	48.85%
CLEC 65	3		0.00%
CLEC 80	1		0.00%
CLEC 23	1051	735	69.93%
CLEC 66	14	9	64.29%
CLEC 28	20	15	75.00%
CLEC 29	13		0.00%
CLEC 67	3		0.00%
CLEC 68	16	13	81.25%
CLEC 69	6	2	33.33%
CLEC 70	153	120	78.43%

#9

GUI LSRs - North Dakota			
CLEC Name	Total Volume of sumbitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
CLEC 71	958	337	35.18%
CLEC 11	1		0.00%
CLEC 53	82	70	85.37%
CLEC 16	142	48	33.80%
CLEC 72	385	109	28.31%
CLEC 73	568	316	55.63%
CLEC 23	18	10	55.56%
CLEC 74	153	95	62.09%
CLEC 30	1218	1109	91.05%
CLEC 68	25	21	84.00%
CLEC 75	314	102	32.48%
CLEC 76	1755	979	55.78%
CLEC 45	3	2	66.67%

#10

GUI LSRs - Nebraska			
CLEC Name	Total Volume of sumbitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
CLEC 46	1596	755	47.31%
CLEC 49	9469	6908	72.95%
CLEC 11	17	17	100.00%
CLEC 53	1286	1063	82.66%
CLEC 16	350	156	44.57%
CLEC 54	8	2	25.00%
CLEC 23	424	308	72.64%
CLEC 77	326	221	67.79%
CLEC 28	49	28	57.14%
CLEC 29	9		0.00%
CLEC 58	53	36	67.92%
CLEC 30	2414	2222	92.05%
CLEC 78	196	146	74.49%
CLEC 68	9	6	66.67%
CLEC 39	40	9	22.50%

Breakdown of FLE LSRs that FTS Submits to SOPs
(10 Tables Total)

#1

EDI LSRs - Colorado			
CLEC Name	Total Volume	No. of FLE LSRs that flow thru to SOP	% of Total
CLEC 4	715	676	94.55%
CLEC 5	1919	1760	91.71%
CLEC 12	1362	1282	94.13%
CLEC 17	3	2	66.67%
CLEC 23	6666	6047	90.71%
CLEC 27	95	82	86.32%
CLEC 29	290	276	95.17%
CLEC 31	2750	2553	92.84%
CLEC 32	4	0	0.00%
CLEC 36	706	656	92.92%
CLEC 37	2	0	0.00%
CLEC 39	13201	12764	96.69%
CLEC 40	1	1	100.00%

#2

EDI LSRs - Iowa			
CLEC Name	Total Volume	No. of FLE LSRs that flow thru to SOP	% of Total
CLEC 23	3817	3265	85.54%
CLEC 29	120	99	82.50%
CLEC 32	5	0	0.00%

#3

EDI LSRs - Idaho			
CLEC Name	Total Volume	No. of FLE LSRs that flow thru to SOP	% of Total
CLEC 23	3597	3251	90.38%
CLEC 29	98	86	87.76%

#4

EDI LSRs - N Dakota			
CLEC Name	Total Volume	No. of FLE LSRs that flow thru to SOP	% of Total
CLEC 23	634	559	88.17%
CLEC 29	15	15	100.00%
CLEC 32	3	0	0.00%

#5

EDI LSRs - Nebraska			
CLEC Name	Total Volume	No. of FLE LSRs that flow thru to SOP	% of Total
CLEC 23	4937	4675	94.69%
CLEC 29	62	44	70.97%
CLEC 32	4	0	0.00%

Breakdown of FLE LSRs that FTS Submits to SOPs
(10 Tables Total)

#6

GUI LSRs - Colorado			
CLEC Name	Total Volume	No. of FLE LSRs that flow thru to SOP	% of Total
CLEC 1	10	6	60.00%
CLEC 2	683	600	87.85%
CLEC 3	25	24	96.00%
CLEC 5	23	22	95.65%
CLEC 6	2	2	100.00%
CLEC 9	2	1	50.00%
CLEC 10	2	2	100.00%
CLEC 11	300	289	96.33%
CLEC 12	82	79	96.34%
CLEC 13	123	118	95.93%
CLEC 14	44	42	95.45%
CLEC 15	2362	2265	95.89%
CLEC 16	302	282	93.38%
CLEC 17	73	71	97.26%
CLEC 19	269	252	93.68%
CLEC 21	2357	2249	95.42%
CLEC 23	812	766	94.33%
CLEC 24	8	5	62.50%
CLEC 25	21	20	95.24%
CLEC 26	8154	7452	91.39%
CLEC 27	27	21	77.78%
CLEC 28	467	388	83.08%
CLEC 29	1	1	100.00%
CLEC 30	4301	4171	96.98%
CLEC 31	243	239	98.35%
CLEC 34	128	112	87.50%
CLEC 37	364	331	90.93%
CLEC 38	263	251	95.44%
CLEC 39	2241	1962	87.55%
CLEC 41	3	3	100.00%
CLEC 42	1	0	0.00%
CLEC 43	46	36	78.26%
CLEC 44	1	1	100.00%
CLEC 45	63	63	100.00%

#7

GUI LSRs - Iowa			
CLEC Name	Total Volume	No. of FLE LSRs that flow thru to SOP	% of Total
CLEC 46	22	20	90.91%
CLEC 47	2	0	0.00%
CLEC 48	28	28	100.00%
CLEC 9	3935	3794	96.42%
CLEC 49	581	570	98.11%
CLEC 50	887	829	93.46%
CLEC 11	173	160	92.49%
CLEC 51	245	244	99.59%
CLEC 52	19	18	94.74%
CLEC 53	1747	1704	97.54%
CLEC 16	170	145	85.29%
CLEC 54	235	198	84.26%
CLEC 55	97	92	94.85%
CLEC 56	267	250	93.63%
CLEC 57	83	78	93.98%
CLEC 23	236	223	94.49%
CLEC 25	1	1	100.00%
CLEC 58	75	66	88.00%
CLEC 30	4025	3833	95.23%
CLEC 59	1	1	100.00%
CLEC 60	870	818	94.02%
CLEC 61	73	70	95.89%
CLEC 62	5	5	100.00%
CLEC 45	9	8	88.89%

Breakdown of FLE LSRs that FTS Submits to SOPs
(10 Tables Total)

#8

GUI LSRs - Idaho			
CLEC Name	Total Volume	No. of FLE LSRs that flow thru to SOP	% of Total
CLEC 48	171	159	92.98%
CLEC 63	16	11	68.75%
CLEC 16	14	14	100.00%
CLEC 64	64	43	67.19%
CLEC 23	735	703	95.65%
CLEC 66	9	9	100.00%
CLEC 28	15	11	73.33%
CLEC 68	13	12	92.31%
CLEC 69	2	0	0.00%
CLEC 70	120	117	97.50%

#9

GUI LSRs - N Dakota			
CLEC Name	Total Volume	No. of FLE LSRs that flow thru to SOP	% of Total
CLEC 71	337	275	81.60%
CLEC 53	70	70	100.00%
CLEC 16	48	41	85.42%
CLEC 72	109	80	73.39%
CLEC 73	316	272	86.08%
CLEC 23	10	8	80.00%
CLEC 74	95	73	76.84%
CLEC 30	1109	1044	94.14%
CLEC 68	21	19	90.48%
CLEC 75	102	74	72.55%
CLEC 76	979	910	92.95%
CLEC 45	2	1	50.00%

#10

GUI LSRs - Nebraska			
CLEC Name	Total Volume	No. of FLE LSRs that flow thru to SOP	% of Total
CLEC 46	755	621	82.25%
CLEC 49	6908	6818	98.70%
CLEC 11	17	17	100.00%
CLEC 53	1063	1024	96.33%
CLEC 16	156	131	83.97%
CLEC 54	2	2	100.00%
CLEC 23	308	266	86.36%
CLEC 77	221	196	88.69%
CLEC 28	28	24	85.71%
CLEC 58	36	25	69.44%
CLEC 30	2222	2090	94.06%
CLEC 78	146	127	86.99%
CLEC 68	6	5	83.33%
CLEC 39	9	7	77.78%

Breakdown of How Many Manually Processed LSRs are Immediately Rejected by SDC (5 Tables Total)

Colorado			
CLEC	Total Volume LSRs placed in Manual Queue	No. of LSRs SDCs immediately Reject	% of Total
CLEC 1	40	7	17.50%
CLEC 2	2249	226	10.05%
CLEC 3	6	1	16.67%
CLEC 4	254	46	18.11%
CLEC 5	2092	479	22.90%
CLEC 6	15	0	0.00%
CLEC 7	9	6	66.67%
CLEC 8	2	1	50.00%
CLEC 9	1	0	0.00%
CLEC 10	0	0	0.00%
CLEC 11	70	7	10.00%
CLEC 12	5702	613	10.75%
CLEC 13	28	9	32.14%
CLEC 14	21	7	33.33%
CLEC 15	401	96	23.94%
CLEC 16	376	44	11.70%
CLEC 17	44	5	11.36%
CLEC 18	2	2	100.00%
CLEC 19	121	24	19.83%
CLEC 20	1	1	100.00%
CLEC 21	1001	150	14.99%
CLEC 22	13	3	23.08%
CLEC 23	14324	2175	15.18%
CLEC 24	108	32	29.63%
CLEC 25	14	4	28.57%
CLEC 26	4021	756	18.80%
CLEC 27	461	53	11.50%
CLEC 28	299	97	32.44%
CLEC 29	291	23	7.90%
CLEC 30	834	100	11.99%
CLEC 31	629	104	16.53%
CLEC 32	10	7	70.00%
CLEC 33	9	6	66.67%
CLEC 34	179	63	35.20%
CLEC 35	1	0	0.00%
CLEC 36	248	111	44.76%
CLEC 37	137	26	18.98%
CLEC 38	119	47	39.50%
CLEC 39	8344	548	6.57%
CLEC 40	0	0	0.00%
CLEC 41	21	9	42.86%

Iowa			
CLEC	Total Volume LSRs placed in Manual Queue	No. of LSRs SDCs immediately Reject	% of Total
CLEC 46	14	2	14.29%
CLEC 47	26	6	23.08%
CLEC 48	13	3	23.08%
CLEC 9	622	102	16.40%
CLEC 49	208	8	3.85%
CLEC 50	342	41	11.99%
CLEC 11	42	7	16.67%
CLEC 51	168	5	2.98%
CLEC 52	58	11	18.97%
CLEC 53	493	50	10.14%
CLEC 16	236	18	7.63%
CLEC 54	153	14	9.15%
CLEC 55	15	2	13.33%
CLEC 56	150	15	10.00%
CLEC 57	138	8	5.80%
CLEC 23	19553	3017	15.43%
CLEC 25	0	0	0.00%
CLEC 29	121	10	8.26%
CLEC 58	79	16	20.25%
CLEC 30	720	108	15.00%
CLEC 59	0	0	0.00%
CLEC 32	9	3	33.33%
CLEC 60	331	35	10.57%
CLEC 61	172	5	2.91%
CLEC 62	9	2	22.22%
CLEC 45	7	4	57.14%

Breakdown of How Many Manually Processed LSRs are Immediately Rejected by SDC (5 Tables Total)

CLEC 42	213	29	13.62%
CLEC 43	377	24	6.37%
CLEC 44	0	0	0.00%
CLEC 45	24	10	41.67%

Idaho			
CLEC	Total Volume LSRs placed in Manual Queue	No. of LSRs SDCs immediately Reject	% of Total
CLEC 48	68	11	16.18%
CLEC 63	66	9	13.64%
CLEC 16	10	0	0.00%
CLEC 64	87	7	8.05%
CLEC 65	5	2	40.00%
CLEC 23	2585	499	19.30%
CLEC 66	6	1	16.67%
CLEC 28	10	1	10.00%
CLEC 29	86	14	16.28%
CLEC 67	3	0	0.00%
CLEC 68	5	1	20.00%
CLEC 69	5	0	0.00%
CLEC 70	48	16	33.33%

N Dakota			
CLEC	Total Volume LSRs placed in Manual Queue	No. of LSRs SDCs immediately Reject	% of Total
CLEC 71	737	65	8.82%
CLEC 11	2	1	50.00%
CLEC 53	12	0	0.00%
CLEC 16	109	13	11.93%
CLEC 72	350	52	14.86%
CLEC 73	312	35	11.22%
CLEC 23	4290	616	14.36%
CLEC 74	104	17	16.35%
CLEC 29	14	2	14.29%
CLEC 30	223	47	21.08%
CLEC 32	15	12	80.00%
CLEC 68	8	2	25.00%
CLEC 75	315	38	12.06%
CLEC 76	924	72	7.79%
CLEC 45	1	0	0.00%

Nebraska			
CLEC	Total Volume LSRs placed in Manual Queue	No. of LSRs SDCs immediately Reject	% of Total
CLEC 46	1015	62	6.11%
CLEC 49	2625	113	4.30%
CLEC 11	0	0	0.00%
CLEC 53	298	35	11.74%
CLEC 16	262	26	9.92%
CLEC 54	6	0	0.00%
CLEC 23	2457	479	19.50%
CLEC 77	160	26	16.25%
CLEC 28	28	4	14.29%
CLEC 29	55	6	10.91%
CLEC 58	28	3	10.71%
CLEC 30	420	104	24.76%
CLEC 32	10	6	60.00%
CLEC 78	72	5	6.94%
CLEC 68	6	2	33.33%

Breakdown of How Many Manually Processed LSRs are Immediately Rejected by SDC (5 Tables Total)

CLEC 39	34	4	11.76%

FCC Request for Supplemental LSR Data – 6/28/02

- **Breakdown of LSRs that IMA determines are FLE – 10 tables total**

(Interface used, i.e GUI) LSRs– (STATE, i.e ND)

CLEC Name	Total Volume of submitted LSRs	No. of electronically submitted LSRs that IMA finds FLE	% of Total
1			
2			

- **Breakdown of FLE LSRs that FTS submits to SOP – 10 tables total**

(Interface used, i.e GUI) LSRs– (STATE, i.e ND)

CLEC Name	Total Volume	No. of FLE LSRs that flow through to SOP	% of Total
1			
2			

- **Breakdown of how many manually processed LSRs are kicked out by SOP – 5 Tables**

(STATE, i.e. ND)

CLEC	Total Volume of SDC approved LSRs	No. of SDC processed LSRs that SOP kicks out due to error	% of Total
1			
2			

- **Breakdown of how many manually processed LSRs are immediately rejected by SDCs – 5 Tables**

(STATE, i.e ND)

CLEC	Total Volume LSRs placed in manual queue	No. of LSRs SDCs immediately reject	% of Total
1			
2			

Wholesale

Products & Services

Business Procedures

- **Getting Started**
  - **-Facility Based CLECs**
  - **-Resellers**
- **Account Team**
- **Billing - Additional Output**
- **Billing - Billing Percentage Worksheet**
- **Billing - Billing & Receivable Tracking (BART)**
- **Billing - Customer Records and Information System (CRIS)**
- **Billing - Daily Usage File (DUF)**
- **Billing - Integrated Access Billing System (IABS)**
- **Billing - Taxes and Tax Exemption**
- **Bona Fide Request (BFR) & Special Request (SR) Processes**
- **Calling Card/LIDB**
- **CLEC Requested UNE Construction (CRUNEC)**
- **Common Language**
- **Customer Contacts**

Ordering Overview - V17.0

History Log

Description

Qwest offers various ordering methods to submit service requests for your Unbundled Network Elements (UNEs), Resale or Interconnection products and services with functions that include, but are not limited to, the following:

- Submitting service requests electronically or manually
- Preparing a service request
- Requesting Design Layout Reports (DLR)
- Relating service requests and managed projects
- Submitting a service request
- Editing errors and rejections
- Issuing supplements and/or cancels
- Acknowledging receipt of your service request
- Monitoring the status of your service request

The matrix below groups Qwest Wholesale Products and Services by the various forms used to submit service requests. Since Ordering functions vary by individual product and service, refer to specific documentation in the Wholesale Products and Services Web pages.

Qwest's Wholesale Products and Services Submitted on Local Service Ordering Guidelines (LSOG) forms	
• Centrex and Centrex 21 • Digital Subscriber Line (DSL) see Qwest DSL Resale • Directory Listings • Integrated Services Digital Network (ISDN)- Basic Rate Interface (BRI) • Loop Splitting (Unbundled Loop sharing) • Network Interface Device (NID) • Interim Number Portability (INP)/ Local Number Portability (LNP)	• Unbundled ISDN- Primary Rate Interface (PRI) DID/ PBX/ DOD Facility/ Trunk Member • Unbundled Switch Trunk-side Facilities • Unbundled Switching Line/ Trunk-side Facilities • Unbundled Digital Line-side Switch Port (DLSP)- BRI ISDN Capable • Unbundled Distribution Loop • Unbundled Distribution

- Directory Ordering
- Early Order Opportunity
- Electronic Access
- Expedites and Escalations Overview
- Features
- Forecasting
- Formal Complaint Process
- Geographic Deaveraging
- Local Service Freeze
- Local Service Ordering Guidelines (LSOG)
- Long Distance Carrier Selection
- Maintenance & Repair Overview
- Manual Interfaces
- Migrations and Conversions
- Negotiations Process
- Negotiations Template Agreement
- New Customer Questionnaires
- Ordering Overview
- Pre Ordering Overview
- Proof Of Authorization/Letter Of Agency (LOA)
- Provisioning & Installation Overview
- Regulatory Commissions
- Service Intervals
- Tariff Locations
- Technical Publications

- Resale Centrex and Centrex 21
- Qwest DSL Resale
- Resale Designed Trunks (Exception: Direct Inward Dialing (DID) one-way incoming trunk)
- Resale DID In Only Trunks
- Resale Digital Switched Services (DSS)
- Resale Frame Relay
- Resale ISDN-BRI
- Resale Public Access Line (PAL)
- Resale Private Branch Exchange (PBX) for Plain Old Telephone Service (POTS) - Non-Designed trunks
- Resale POTS
- Resale Private Line
- Resale Single Line see Resale ISDN-BRI
- Shared Distribution Loop
- Shared Interoffice Transport
- Shared Loop (Line Sharing)
- Unbundled DID/ PBX/ Direct Outward Dialing (DOD) Facility/ Trunk Member
- Loop with INP/ LNP
- Unbundled Feeder Loop
- Unbundled Local Loop
- Unbundled Local Loop DLSP/ Asymmetrical Digital Subscriber Line (ADSL) Capable
- Unbundled Local Loop with INP/ LNP
- Unbundled Local Sub-Loop
- Unbundled Local Switching (Port)
- Unbundled Packet Switching (UPS)
- Unbundled Switch DLSP/ Analog Line Side Switch Port (ALSP)
- Unbundled Switch Digital/ Analog Trunk Facilities
- Enhanced Extended Loop (EEL)
- UNE Combinations
- Unbundled Network Element-Platform (UNE-P) Centrex and Centrex 21
- UNE-P DID Trunks
- UNE-P DSS
- UNE-P ISDN-BRI
- UNE-P Line Splitting
- UNE-P PBX Analog Trunks
- UNE-P PRI
- UNE-P POTS

Qwest's Wholesale Products and Services Submitted on Access Service Ordering Guidelines (ASOG) Forms

- Data Base Services
- Digital Data Services (DDS)- Private Line Transport Service (PLTS) for Access
- Feature Groups A/B/C/D, Service Access Code (SAC), NXX, Local Trunking
- Hi-Cap Facilities (Digital Signal level 1 (DS1), Digital Signal level 3 (DS3), etc.)
- Jointly Provided Switch Access- Feature Groups A/B/C/D (Meet Point Billing)
- Local Interconnect Services (LIS)
- Local Tandem Switching
- Private Line see PLTS for Access
- PLTS
- Self Healing Network Services (SHNS)
- Signaling System 7 (SS7) Links
- Synchronous Service Transport (SST)
- Unbundled Dark Fiber (UDF)
- Unbundled Dedicated Interoffice Transport (UDIT)
- Unbundled Multiplexer
- Unbundled Signaling Transfer Points (STP) Port
- Wireless Interconnect Services Type I
- Wireless Interconnect Services Type 2

Submitted on Special Forms

- Collocation and Remote Collocation

▸ **Telecommunications Associations**

▸ **Unauthorized Service Provider Change**

▸ **USOC/FID Finder**

- Poles, Ducts and Right of Way
- Central Office- Automatic Call Distribution (CO-ACD) Service

Interconnect Mediated Access (IMA) functions described in this section do not apply to Wholesale Interconnection Products and Services (e.g., LIS, UDF, and UDIT). Refer to individual Wholesale Products and Services to identify requirements for services ordered on ASOG forms.

Complete details on Qwest's IMA Ordering functionality can be found in the IMA User's Guide.

Qwest's Service Interval Guidelines are defined in the Service Interval Guide (SIG).

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Implementation

Product Prerequisites

Qwest offers various methods to submit service requests. Electronic access can be accomplished three different ways:

- **Dial-up capability** - Log on to Qwest's ordering systems from your local computer.
- **Direct connection via a dedicated circuit (IMA Electronic Data Interchange (EDI) or EXACT)** - Recommended for Competitive Local Exchange Carriers (CLECs) generating large volumes with more than 50 staff members accessing ordering systems.
- **Web Access** - Access IMA and other Qwest Graphical User Interface (GUI) tools from your desktop computer.

Requirements for accessing Qwest's ordering systems are defined in the New Customer Questionnaires, the Electronic Access Checklist, and the Operations Support System Checklist. Contact your Qwest Service Manager if you need additional information.

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Submitting Service Requests Electronically or Manually

- **Telecommunications Information Access Ordering Systems (TELecommunication Information System (TELIS) - UNIX)** Allows you to electronically submit ASRs to request trunking and facilities between you and Qwest for LIS, interstate and intrastate-switched access, and PLTS offered for the origination and/or termination of inter-exchange traffic.
- **IMA GUI or EDI Interface**
  IMA allows you to submit service requests via a web based GUI or EDI. To access the IMA Ordering functions you need to be properly set up and complete a Personal Profile. Refer to the IMA Connection Guide for information.

- **Facsimile for Non Electronic Interface CLECs**
  If you do not have access to Qwest Electronic Interface Tools, you may submit your service requests to Qwest via facsimile. Refer to the Contact section at the end of this document for a list of Qwest service centers.

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Service Request Preparation

Qwest specific forms and field entry requirements are identified in the LSOG and the ASOG.

When adding, changing or removing features, e.g., Call Forwarding, Voice Mail, or Hunting, you should review the entire Customer Service Record (CSR) for impacts to all lines on the account. You are responsible for adding, removing, and changing all appropriate Universal Service Order Codes (USOCs) on the applicable LSOG or ASOG form.

When ordering 4-wire finished services, two terminations are required for the connection when terminating into a collocation space. Qwest Engineering uses consecutive terminations using the 2-wire termination, you provide as the transmit pair to the end-user, and your next consecutive 2-wire termination for the receiving transmit into the Collocation space. To prevent a delay, submit a termination that also has a consecutive spare termination. If two consecutive terminations are not available, a busy facility jeopardy code is assigned and your service request is returned so you can correct the Connecting Facility Assignment (CFA) for the consecutive terminations. Impacted Wholesale products and services include:

- ISDN - PRI
- DDS
- Hi-Cap Facilities (DS1, DS3, etc.)
- LIS
- Local Tandem Switching
- Private Line see PLTS for Access
- PLTS
- SHNS
- SS7
- SST

Refer to individual Wholesale Interconnection Products and Services Web pages for specific ordering information and LSOG and ASOG requirements.

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Requesting DLR

The IMA DLR function automates the manual process of requesting a DLR so you can view, retrieve and print Design Layout Records at your desktop. More details related to accessing Design Layout Records in IMA can be found in the IMA User's Guide.

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Relating Service Requests and Managed Projects

Related service requests and/or projects are defined as "any request for service by a single CLEC resulting in the issuance of multiple service requests that must be worked simultaneously for the request to be completed". If the related service requests constitute a project, each service request must have an assigned Project ID and a Project Manager/Coordinator monitoring the project. The Project ID is entered in the "PROJECT" field on the Local Service Request (LSR) form. A designated Single Point of Contact (SPOC) will coordinate the project and your Qwest Service Manager will work with you to negotiate the project on an individual case basis.

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Submitting a Service Request - IMA

Once all the forms are completed, the Order Submit Confirmation screen enables you to view basic information and submit your service request. IMA alerts you to some errors on the various forms prior to submitting your service request. Return to the LSOG information, select the form(s) to make the necessary changes, and submit your service request. Additional information related to submitting a service request can be found in the IMA User's Guide.

After a service request has been submitted via IMA, specific product categories are eligible for system Flow Through. The product categories, activity types, and exceptions to Flow Through eligibility are as follows:

Product Categories	**Activity Types** **(LSR Form Activity (ACT) Field)**	**Exceptions to Flow Through** **(Exceptions apply to all versions of IMA except as noted)**
Unbundled Local Loop	• Conversion as Specified (ACT V) • New Installation (ACT N) • Disconnect (ACT D) • Outside Move (ACT T)	• CLEC sets manual handling indicator • Supplemental Orders (Due Date Change and Other Change) • Expedites • LSR Quantity >20 ACT "V", "N", "T", and "D" • LSR Quantity > 10 ACT "T" and "D" (IMA versions 10.0 and Post 10.0 LSRs only) • Government Account (Type Of Service (TOS) 3) • Pending orders ACT "V", "N" and "T" (actual or indicated by CLEC) • Related Requests (Related Purchase Order Number (RPON) or Related Order (RORD)) • Partial conversion on accounts with multiline hunting • CLEC sets Address not in

		Database Indicator (e.g., new construction) (Address Not Validated (ANV)) • ADSL Compatible Loop ACT "V", "N" and "T" • ISDN BRI Capable Loop ACT "V", "N" and "T" • xDSL-I Capable Loop ACT "V", "N" and "T" • DS1 Capable Loop ACT "V", "N" and "T" • Optical Carrier level n (OCn) Capable Loop ACT "V", "N" and "T" • DS3 Capable Loop ACT "V", "N" and "T"
Unbundled Local Loop with LNP	• Conversion as Specified (ACT V) • Conversion as Specified No Directory Listing (ACT Z)	• CLEC sets manual handling indicator • Supplemental Orders (Due Date Change and Other Change) • Expedites • LSR Quantity >20 • Government Account (TOS 3) • Pending orders (actual or CLEC specified) • Related Requests (RPON or RORD) • Partial conversion on accounts with multiline hunting • ADSL Compatible Loop • ISDN Basic Rate (BRI) Capable Loop • xDSL-I Capable Loop • Complex product (non-POTS) porting
LNP	• Conversion as Specified (ACT V) • Conversion as Specified No Directory Listing (ACT Z)	• CLEC sets manual handling indicator • Supplemental orders (Due Date Change and Other Change) • Expedites • LSR Quantity > 20 • Government Account (TOS 3) • Complex products (non-POTS) • Pending Orders (actual or

		CLEC Indicated) • Related Requests (RPON or RORD) • Partial conversion on accounts with multiline hunting.
Resale — Local Exchange Services and UNE-P - POTS	• Conversion as Is (ACT W) • Conversion as specified (ACT V) • Conversion as Specified No Directory Listing (ACT Z) • Change (ACT C) • New Installation (ACT N) • Disconnect (ACT D) • Outside Move (ACT T) • Restore (ACT B) • Suspend (ACT L) • Deny ACT (Y)	• CLEC sets manual handling indicator • Supplemental Orders (Due Date Change and Other Change) • Expedites • LSR Quantity >20 • Government Account (TOS 3) • Number Changes on multi-line accounts • Pending Orders ACT "W", "V", "Z", "C", "N", "D", "T", "L", and "Y" (actual or CLEC Indicated) • Related Requests (RPON or RORD) • Partial conversion on accounts with multiline hunting • CLEC sets Address not in Database indicator (e.g., new construction)(ANV) • Conversions with voice mail rollover • Eastern Region: CLEC to CLEC conversions • Resale POTS to Resale POTS • UNE-P (POTS) to Resale (POTS) • Central and Western Regions: Conversions with TN changes • Telephone number fields populated with placeholders • Resale Qwest DSL • Resale Centrex (Plus, Prime, Centron, 21) • Resale Private Line • Resale ISDN BRI • Resale — PBX Trunk Service • Resale - Frame Relay Service (FRS) • Resale Remote Call Forwarding • Resale - PAL Service • UNE-P — Centrex (Plus, Prime, Centron, 21) • UNE-P - DSS • UNE-P - ISDN PRI

		• UNE-P - ISDN BRI • UNE-P - PBX Trunks • UNE-P - PAL

Specific products are eligible for system Flow Through when the LSR is canceled (supplemental type 1 request) via IMA. The products, activity types, and exceptions to Flow Through eligibility are as follows:

Products	Activity Types (LSR Form ACT Field)	Exceptions to Flow Through (Exceptions apply to all versions of IMA except as noted)
• Unbundled Local Loop • Unbundled Local Loop with LNP • LNP • Resale- Local Exchange Services — Business and Residence POTS • Resale ISDN BRI • Resale Centrex Plus and Centron, • Resale Centrex Prime • Resale Centrex 21 • Resale — DID Analog In Only Trunk • Resale Design Trunk • UNE-P - POTS	• ALL	• Version of PON prior to cancel is not in an "ISSUED" Status • ACT = N and the Account Number (AN) field is not populated. • For Unbundled Local Loop, Unbundled Local Loop with LNP, Resale Designed Trunks and Resale — DID Analog In Only Trunks: • Time prior to the service order due date for the original request is less than 24 hours • LNP, Resale — Local Exchange Services — Business and Residence POTS, Resale ISDN BRI, Resale Centrex Plus and Centron, Resale Centrex Prime, Resale Centrex 21 and UNE-P — POTS: • Time prior to

		the service order due date for the original request is less than 24 hours and the Line Activity (LNA) is not equal to 'N' and an appointment is indicated on the APTCON field • Time prior to the service order due date for the original request is less than 24 hours and the LNA or the Trunk Activity (DTNRACT or DTKACT) is equal to 'N' • Resale Private Line • Resale – PBX Trunk Service • Resale – FRS • Resale Qwest DSL • Resale ISDN PRI

Submitting a Service Request - Non IMA

If you do not use IMA, submit your service request to the Interconnect Service Center (ISC) via facsimile at 888-796-9089. A Confirmation of Receipt is automatically faxed to your machine.

If the appropriate forms or fields are not complete or accurate, your service request will be returned, via a Notice of Rejection, with a full explanation of what is needed to process the service request.

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Error and Rejection Notifications

While Qwest has taken steps to prevent rejections with helpful up-front edits in IMA, it may be necessary to reject your service request if it is incorrect, incomplete, and/or Qwest has an embargoed Central Office.

Three categories of errors and/or rejections are possible when processing your service request:

- **Non-Fatal Errors**
  Errors the ISC Agent may be able to correct with your approval.

Non-Fatal Error	Example or Explanation
Near match of name or address	End-user Bob's Towing, CSR shows Bob's Automotive
Missing Contact Information	Initiator Telephone or Fax Number
AGency AUTHorization (AGAUTH) "N" with effective date (DATED)	Most likely a typographical error. AGAUTH status should be "Y" with an effective date
Other Missing fields	Missing fields not on Reject Without a Call list

- **Fatal Rejections**
  Fatal Rejections, also known as Fatal Errors, means Qwest does not have enough data, or the correct data, to process your service request. In most instances, IMA will not even allow you to submit your service request if data is missing. When a Notice of Reject is sent, it includes the action you were requesting, the problem(s) encountered and what must happen next on your part. These notifications will be faxed, emailed or made available in the IMA GUI or EDI based on the tool you use to submit service requests.

- **Qwest Rejection Due to Central Office Embargo**
  Central Office embargoes occur for a variety of reasons, including changing the switch and conversions. IMA will validate by NPA-NXX or CLLI code that the Desired Due Date (DDD) of the service request does not fall within an embargo period for the specified Central Office/Switch. If the service request does fall within an embargo period, then IMA shall reject your service request back to you. IMA will include a message on the rejects which reads: "Your desired due date is during an embargo period for the Central Office. Please select a due date on or after xx/xx/xx." The following products will be excluded from this rejection:
    - Unbundled Loop
    - Unbundled Feeder Loop
    - Unbundled Distributed Loop
    - Loop/Number Portability
    - Unbundled Distributed Loop with Number Portability
    - LNP
    - INP

  The following types of activity codes will not be included in rejects for Central Office Embargoes:
    - Disconnects (ACT= Disconnect (D), Line Activity (LNA)=D or ACT=Change (C), LNA=D)
    - Outside Moves (ACT=Outside Move (T), LNA=D)
    - Change Order to Remove (ACT=C, LNA=C, Feature Activity (FA)=D
    - Record Activity Order (ACT=Record (R), LNA=R)
    - Change Order to Deny or Restore Service (ACT= Deny (Y) or Restore (B)

Error Notice Matrix

The following table depicts the type of notification you will receive when an error condition is identified:

If a LSR:	Then:	And:	Additionally:	Then:
Is found to have a fatal error prior to a FOC being sent	Qwest sends a Reject Notification	You resubmit the original LSR with appropriate corrections (not as a supplement)	If the LSR is complete and accurate	Qwest sends you a FOC
Is found to have a non-fatal error prior to a FOC being sent	Qwest sends an Error Notification	Qwest waits a maximum of 4 business hours for you to send a SUP to correct the error(s) or cancel the LSR.	If the error is corrected on a SUP and the LSR is complete and accurate	Qwest sends you a FOC.
			If the error is not corrected within 4 business hours	Qwest cancels the existing service order(s) and sends you a Reject Notification.
Has been accepted and a FOC has been sent and Qwest subsequently detects an error which requires a correction or supplement from you Note: This can be a fatal or non-fatal error condition	Qwest sends you a Jeopardy Notification requesting a LSR correction supplement	Qwest waits a maximum of 4 business hours for you to send a SUP to correct the error(s) or cancel the LSR.	If the error is corrected on a SUP and the LSR is complete and accurate	Qwest sends you a FOC.
			If the error is not corrected within 4 business hours	Qwest cancels the existing service order(s), however, the LSR remains in a Jeopardy status for 30-buusiness days. If the error is not corrected within the 30-business days,

For information regarding jeopardy notifications refer to Jeopardy Notifications within the Provisioning and Installation Overview.

Rejection Reasons

Rejection reasons are divided into categories based on Qwest's expected response:

Reject Without Calling - Fatal Errors:

- Account not in Qwest local exchange territory
- Authorization data missing (exception: changes to accounts already owned by the CLEC)
- Cannot issue supplement when one or more of the service orders generated from your original service request is completed
- Centrex Category (CAT) code missing
- Centrex USOC missing some or all associated Field Identifiers (FIDs)
- Change activity not allowed unless CLEC owns the account
- CLEC Carrier Name Abbreviation (CCNA) missing or invalid
- CLEC failed to respond to query within specified response interval. Refer to Provisioning and Installation Overview regarding the process of handling this circumstance. Examples include:
    - If, after issuance of service orders and Firm Order Confirmation (FOC), Qwest identifies a CLEC error and the CLEC does not respond to the Jeopardy Notice after 30-business days.
    - If a CLEC does not respond to the Jeopardy Notification that is a result of a Customer Not Ready situation within 30-business days
- CLEC unavailable for contact (no email or voice mail, no answer to telephone call)
- Conversion or Disconnect request fails to address all telephone numbers on account, or on Centrex Department or Different Premise Address (DPA)
- DSS trunk New Connect or Disconnect request does not reference related Purchase Order Number (PON) for facility, facility Disconnect or New Connect does not reference related PON for trunks
- End-user authorization information missing
- End-user name, telephone number(s) and address mismatched, missing or incomplete
- Entries on forms illegible
- Features on account are not compatible with requested features
- INP/LNP request includes numbers disconnected more than 3 days ago
- Service request involves multiple Account Telephone Numbers (ATN) (requires additional requests, one for each ATN)
- Service request requests work on a non-working account
- No valid Interconnect Agreement or tariff
- Pending service request that is service affecting and/or work impacting
- PON and Version combination cannot be reused for 2 years from due date of original request

- Product and service description does not enable Qwest to determine USOC or FIDs to be used
- Requested activity has already been requested or performed
- Required forms missing or incomplete
- Some or all telephone numbers are not associated with the ATN listed on the service request (see exception to rule below)
- Unable to locate premises address
- Unbundled Loop request contains missing or invalid Point of Interface (POI) or CFA, or specified slot is in use
- Wrong forms submitted

Contact CLEC to Resolve - Non-Fatal Errors:
When an error condition is identified on a LSR form that is not one of the rejection reasons listed above, it is considered to be a non-fatal error. When a non-fatal error is identified, an error notice is sent advising you that action is required to correct the condition. Examples of non-fatal errors include:

- Near match of name or address
- Near match of Centrex information (*e.g., Common* Block)
- Missing fields-except those which result in a rejection without a cal
- End-user contact information missing
- AGAUTH status field shows "N" instead of "Y" with an effective date (Usually a typographical error)

Error Situations - IMA:

- **Active Status:** With the exception of new service requests, all CSRs must be in an Active status for the service request to be processed. If the CSR has a Final status, IMA automatically rejects your service request and displays an error message.
- **Resale POTS, PBX, or ISDN with Invalid USOCs:** Your service request will be rejected with a list of invalid USOCs displayed.
- **Note IMA EDI:** With one exception, all service requests with missing or incorrect information are rejected. Exception is a cosmetic fix to an address, such as changing "Av" to "Ave. ".

LNP Note: Refer to the Provisioning Section of our Local Number Portability (LNP) Web page for additional reject processing specific to LNP.

Resubmitting a Rejected Service Request

Generally, a rejected service request is resubmitted by the party making the error. If you submitted an invalid CFA for an Unbundled Loop (UBL), you will need to resubmit the service request. If Qwest rejects a service request in error, we will resume processing as soon as the error is brought to our attention. At your direction, Qwest will place the service request back into normal processing with or without a supplement and issue a subsequent FOC.

Note: Qwest does not charge you for submitting a supplement or resubmitting a service request. Contact your Qwest Service Manager if you have further questions around this issue.

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Supplements and Canceled Service Requests

You may submit a service request that serves as a request to cancel or to add/change an already existing, previously submitted service request, by submitting a supplement and incrementing the version number on the PON. If one or more of the service orders generated from your original service request is completed, a supplement and/or cancel will not be accepted. Once the activity requested on a PON is completed or canceled, a new service request with a new PON must be submitted.

Notes:

- Partial cancellations should have a "3" in the SUP field of the LSR form not a "1" for a full cancellation.
- Changes to desired due date in conjunction with other changes to a pending service request should be submitted with a "3" in the SUP field of the LSR form not a "2" for a due date change only.
- Supplemental service requests require an entry in the REMARKS field of the LSR form to identify the changes. In addition to the changed fields, the remainder of the service request must be identical to the original service request.
- Supplemental service requests are considered a full replacement for previously submitted service request(s), e.g., version 2 completely replaces version 1 of a service request.

During the processing of a service request, Qwest will maintain a status indictor. These status indicators are applicable to service requests. They are as follows:

Service Request Status Indicators	**Description**
Submitted	The service request is set to "Submitted" status when it has been submitted to IMA for processing.
In Review	The service request is set to "In Review" status if it is currently being manually processed, if it has been routed to a Service Center for processing, or if flow through is unable to create a service order.
Errored	The service request is set to "Errored" status if an internal error occurred during flow through or manual processing. An external error was identified during manual processing and a Non Fatal Error Notice was issued.
Partial	The service request is set to "Partial" status if it was submitted for flow through and a full service order could not be created.
Issued	The service request is set to "Issued" status if service order(s) have been issued in the SOP and a FOC has been issued.
Rejected	The service request is set to "Rejected" status if it contained fatal error(s) and a Reject Notice was issued.
Completed	The service request is set to "Completed" status if all service orders associated with the service request

	are completed in the SOP.
Canceled	The service request is set to "Canceled" status if a supplement to cancel the service request was received and processed.
Jeopardy	The service request is set to "Jeopardy" status if there is a facility or Customer Not Ready (CNR) issue related to one or more service orders associated with the service request or a fatal Reject condition is identified after a FOC has been issued.

A "SUP" field entry, containing one of three valid entries, is required on the LSR form for all supplemental service requests:

- **1 = Cancel** - Indicates pending service request is to be canceled ir its entirety. Once Qwest has accepted your service request and yo determine you want to stop processing, a SUP to Cancel is required. If the SUP to cancel is successfully submitted, received by Qwest for processing, and none of the service orders related to the previous version of the service order are complete, Qwest will process the supplemental and cancel the pending service request in its entirety. SUP 1 (Cancel) service requests must be received b 12:00 noon Mountain Time the day prior to the scheduled due date. Various processing scenarios related to Cancel supplemental service requests are:

Scenario	**Processing**
A SUP 1 (Cancel) is not successfully submitted and not received by Qwest for processing (Negative 997 if EDI or BPL. Reject if IMA GUI) This includes cases when any of the service orders are complete.	The previous version of the service request is worked to completion unless Qwest receives a supplemental service request.
A SUP 1 (Cancel) is successfully submitted and received by Qwest for processing. None of the service orders related to the previous version of the service request are complete.	• IMA updates the SUP service request status to Submitted when the SUP service request is received. • Qwest stops processing the previous service request and begins processing the SUP service request. • A Cancel Notice is issued (manual or auto depending on flow through eligibility) • IMA updates the service request status of the SUP service request and the previous service request(s) to Cancel when the Cancel Notice is issued.

- **2 = New Desired Due Date** - Indicates pending service request

requires only a change of desired due date. SUP 2 (Desired Due Date change) service requests must be received by 12:00 noon Mountain Time the day prior to the scheduled due date. Various processing scenarios related to New Desired Due Date supplemental service requests are:

Scenario	Processing
A SUP 2 (Due Date Change) is not successfully submitted and not received by Qwest for processing (Negative 997 if EDI or BPL Reject if IMA GUI)	The previous version of the service request is worked to completion unless Qwest receives a supplemental service request.
A SUP 2 (Due Date Change) is successfully submitted and received by Qwest for processing and any of the service orders on the previous version are complete.	• IMA updates the SUP service request status to Submitted when the SUP service request is received. • Qwest starts processing the SUP service request, stops processing the previous version, and the previous version's status remains Issued. • When it is determined that one or more of the service orders related to the previous service request are complete, processing stops for the SUP service request. • A Reject Notice is manually issued on the SUP service request • IMA updates the SUP service request status to Reject when the Reject Notice is issued on the SUP service request. • Qwest continues processing the previous service request when the Reject Notice is issued on the SUP service request. • The previous service request is worked to completion and a LSR Completion Notice is issued.
A SUP 2 (Due Date Change) is successfully submitted and received by Qwest for processing, none of the service orders on the previous version are complete, and the due date requested is not within the Standard Interval.	• IMA updates the SUP service request status to Submitted when the SUP service request is received. • Qwest starts processing the SUP service request, stops processing the previous version, and the previous version remains in the status it was at the time it

	was superceded (Submitted, In Review, Issued, or Jeopardy). • If the service order(s) has been issued, the service order(s) due date is changed to the next available due date within the Standard Interval. • If the service order(s) has not been issued, the service order(s) is issued to process the SUP service request with the next available due date within the Standard Interval. • A FOC is manually issued on the SUP service request indicating the new service order due date. If the new due date is different than what was requested, the CFLAG is marked on the FOC. • IMA updates the SUP service request status to Issued when the FOC is issued. • The SUP service request is worked to completion and a LSR Completion Notice is issued unless Qwest receives a supplemental
A SUP 2 (Due Date Change) is successfully submitted and received by Qwest for processing, none of the service orders on the previous version are complete, and the due date requested is within the Standard Interval	• IMA updates the SUP service request status to Submitted when the SUP service request is received. • Qwest starts processing the SUP service request, stops processing the previous version, and the previous version remains in the status it was at the time it was superceded (Submitted, In Review, Issued, or Jeopardy). • If the service order(s) has been issued, the service order(s) due date is changed to the date requested. • If the service order(s) has not been issued, the service order(s) is issued to process the SUP service request with the date requested. • A FOC is manually issued on the SUP service request indicating the new service

	order due date. • IMA updates the SUP service request status to Issued when the FOC is issued. • The SUP service request is worked to completion and a LSR Completion Notice is issued unless Qwest receives a supplemental

- **3 = Other** - Any other change being requested for a pending service request. If a SUP 3 requesting Other changes is successfully submitted, received by Qwest for processing, and none of the service orders related to the previous version of the service request are complete, the supplemental will be processed. If the supplemental is accepted for processing, the requested changes may affect the previously agreed upon due date. SUP 3 (Other changes) service requests must be received by 12:00 noon Mountain Time the day prior to the scheduled due date. Various processing scenarios related to Other supplemental service requests are:

Scenario	Processing
A SUP 3 (Other Changes) is not successfully submitted and not received by Qwest for processing. (Negative 997 if EDI or BPL Reject if GUI)	The previous version is worked to completion and a LSR Completion Notice is issued unless Qwest receives a supplemental
A SUP 3 (Other Changes) is successfully submitted and received by Qwest for processing and any of the service orders on the previous version are complete.	• IMA updates the SUP service request status to Submitted when the SUP service request is received • Qwest starts processing the SUP service request, stops processing the previous version, and the previous version status remains Issued. • A Reject Notice is manually issued on the SUP service request when it is determined that one or more of the service orders associated with the previous version are complete • IMA updates the SUP service request status to Reject when the Reject Notice is issued on the SUP service request • Qwest stops processing the SUP service request and continues processing the previous service request. • The previous service request is worked to completion and a LSR Completion Notice is

	Issued
A SUP 3 (Other Changes) is successfully submitted and received by Qwest for processing, none of the service orders on the previous version are complete, and the SUP service request contains a Non Fatal Error condition.	• IMA updates the SUP service request status to Submitted when the SUP service request is received • Qwest starts processing the SUP service request, stops processing the previous version, and the previous version remains in the status it was at the time it was superceded (Submitted, In Review, Error, Reject, Issued, or Jeopardy). • A Non Fatal Error Notice is manually issued requesting a new SUP to correct the error condition • IMA updates the SUP service request status to Error when the Non Fatal Error Notice is issued. • If the new SUP to correct the error condition is not received within 4 hours, the SUP service request is Rejected: o A Reject Notice is manually issued explaining why the SUP service request is being rejected o IMA updates the SUP service request status to Reject when the Reject Notice is issued o Service orders associated with the previous service request are canceled o A new SUP to correct the error condition is required to continue processing the PON • If the new SUP to correct the error condition is received within 4 hours, the new SUP service request is processed
A SUP 3 (Other Changes) is successfully submitted and received by Qwest for processing, none of the service orders on the previous version are complete, and the SUP service request contains a Reject condition.	• IMA updates the SUP service request status to Submitted when the SUP service request is received • Qwest starts processing the SUP service request, stops processing the previous version, and the previous version remains in the status it was at the time it was superceded (Submitted, In Review, Error, Reject, Issued,

	or Jeopardy). • A Reject Notice is manually issued explaining why the SUP service request is being rejected. • IMA updates the SUP service request status to Reject when the Reject Notice is issued. • Service orders associated with the previous service request are canceled. • A new SUP service request to correct the Reject condition is required to continue processing the PON.
A SUP 3 (Other Changes) is successfully submitted and received by Qwest for processing, none of the service orders on the previous version are complete, and the SUP service request contains no errors.	• IMA updates the SUP service request status to Submitted when the SUP service request is received • Qwest starts processing the SUP service request, stops processing the previous version, and the previous version remains in the status it was at the time it was superceded (Submitted, In Review, Error, Reject, Issued, or Jeopardy). • If the service order(s) has been issued, the existing service order(s) is updated, or canceled and a new service order(s) is issued as necessary to process the requested change. • If the service order(s) has not been issued, the service order (s) is issued as necessary to process the SUP service request • A FOC is manually issued on the SUP service request indicating the new and/or changed order information • IMA updates the SUP service request status to Issued when the FOC is issued • The SUP service request is worked to completion and a LSR Completion Notice is issued unless Qwest receives a supplemental

Supplemental Versioning and Error Corrections

If the original service request version is "1", the starting version of a supplement is "2". For every supplement issued, a confirmation may be returned if the service request processed through our systems before receipt of a subsequent supplement. Qwest advises, but does not require,

you wait until the current supplement is confirmed, or an error is received, before you issue another supplement. Error correction handling includes:

- If a system generated FATAL error is returned, correct the supplement and re-issue it with the same version number.
- If a manually generated FATAL error is returned, correct the supplement, increment the version number, and re-issue it.
- If the supplement fails Qwest's system edits, you will receive an Acknowledgment (FATAL) with one or more fatal error codes. Resolve the errors and resubmit the supplement.
- If a supplement fails Qwest's system edits or another error is manually detected, correct the supplement, increment the version number, and reissue the supplemental service request.

When your supplemental service request is accepted, a confirmation indicating Qwest accepted the service request is returned and, after our service order processing systems accepts the service request, a FOC is sent.

Issuing Supplemental Service Requests - Non IMA

If you do not use IMA, fax your supplemental service requests to Qwest (see Contacts section of this document). We will compare the supplement with your previously submitted service request, and verify the original service request is not completed or rejected prior to processing your supplemental service request. If your original service request was canceled or completed, you will need to submit a new service request with a new PON assigned by you.

A rejected service request is not considered a candidate for a supplement Make the appropriate changes and re-fax the rejected service request.

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Acknowledging Service Requests

After your service request is submitted via the Order Submit Confirmatior screen, IMA confirms the order. A message advises you if your submission was successful and the type of service request submitted.

Reviewing IMA Queue

When service requests are submitted after normal operating hours, IMA places your service request in a queue until normal operating hours for processing. When normal operating hours are in effect, you can review a list of your service requests in the queue by entering any one of the following:

- CCNA - Customer Carrier Name Abbreviation
- CC - Company Code
- User ID - IMA log-on ID (Creator of original service request, blank for all saved service requests)
- PON - Purchase Order Number of service request to be displayed (blank to display all)
- LSRID - LSR number

IMA displays:

- Queue Status of the service request in the queue
- Queue Date service request was placed in the queue
- Purge Date service request will be purged from the list
- Remove From List to remove a non-accepted service request
- Display Errors on service requests that were not accepted
- Open Highlighted Opens the service request for editing

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Monitoring Service Request Status - IMA

Qwest's IMA GUI tool offers a variety of ways to monitor the status of your service request during and after the ordering process is complete. Refer to the IMA User's Guide for more details on monitoring your service requests in IMA.

Monitoring Service Request Status - Non IMA

If you do not use IMA you may obtain a status of your service request by calling the ISC with the PON and one or more telephone numbers on the service request. The ISC will provide the status, or negotiate a commitment as to when they can provide a status.

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Status Response Intervals

A response interval, assigned according to your inquiry or reason for contacting the ISC, is entered in Qwest's Call Center database once the reason for your call is determined. When a response interval is assigned, you will be advised as to when to expect a call back from a Service Delivery Coordinator (SDC) who will provide you a status update every 2 hours until your situation or concern is resolved. While not an all-inclusive list, the following illustrates response intervals based on the reason for your call:

- 2-Hour Response Interval
  - Your end-user is out of service due to recent order activity
  - Request to change a due date on a service request that is due to be completed today
  - Request to cancel a service request that is due today
  - LNP concurrence needed
  - Service request rejected and additional information is needed
  - Non-fatal error notice requires further information
  - Port has gone bad, work back needed (End-user may or may not be out of service)

- 24-Hour Response Interval
  - Service request status
  - Status request for a service request not due today
  - How to complete service request questions that are not IMA Help Desk related
  - Assistance needed with an address validation
  - Resend of a FOC or other notices that can be resent
  - IMA functionality
  - Jeopardy notice received and further explanation is needed
  - Additional information needed for a requested service that

has become a delayed order
- DMARC location or information for a completed service request
- CFA information for a service request that is not yet placed, due today, or in a reject status
- Assistance with the data contained on a Loss or Completion report

- 48-Hour Response Interval
  - End-user's CSR reflects non published directory listing, however, service request was to publish listing in the telephone directory
  - General directory listing related questions such as how to se up a listing or provide definition of a listing
  - Assistance with an archived service request

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Delayed Service Request Handling

A request for service is considered delayed when a service order cannot be provisioned due to lack of facilities or lack of qualified facilities in the Central Office, in the local loop from the Central Office to the end-user, or between Central Offices.

When Qwest receives a request for service at a location where no are available, a SDC in our Wholesale Delayed Order Monitoring Group will contact you to advise you of the delayed order status and reason. You will be referred to Qwest's Held Escalated Expedite Tool (HEET) for ongoing status if your service was requested on an ASR.

Once facilities are available for your service request, a SDC from our Wholesale Delayed Order Monitoring Group will contact you to advise you of our earliest possible due date. Qwest's Wholesale policy is to serve as your advocate by tracking all delayed service requests and communicating with you while working closely with our internal Network organizations to facilitate closure of a delayed order.

If you submit a service request for UNEs and Qwest does not have the facilities available to meet that request based upon your requirements, you have a number of options:

- Resubmit your request when facilities to become available
- Request service via Qwest's CLEC Requested UNE Construction Process (CRUNEC). Refer to CLEC Requested UNE Construction for additional information regarding CRUNEC.
- Request service via Qwest's Private Line (Special Access) Services. Special Access Services are ordered on ASR forms.
  - In Colorado and Washington, Qwest will produce reports regarding Private Line (Special Access) Services ordered in lieu of UNEs in these states. These reports will be based upon self reporting by CLECs. If you choose to identify ASRs used to order Special Access Services in lieu of UNEs, the ASR form must be completed as follows:
    - The first 3 positions of the Project field must contain "LU#".
    - If the ASR is associated with a Project, type your project number after the "LU#" entry.
    - For information regarding how to complete the other

fields, refer to ASR Forms

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Escalations

You may initiate an escalation of your service request at any time during the ordering process by calling the appropriate center. Refer to the Contact Section at the end of this document for a list of Qwest's service centers. Escalations begin with the Service Center's Supervisor then progress to the Manager, Director, and Vice President levels within Qwest.

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Training

Qwest 101 "Doing Business With Qwest"

- This introductory course is designed to teach the CLEC and Reseller how to do business with Qwest. It will provide a general overview of products and services, Qwest systems, ASR/LSR, reports, and web resource access information. Click here for Course detail and registration information.

IMA "Hands On"

- This introductory course is designed to teach the CLEC and the Reseller to efficiently use Qwest's IMA GUI tool to order wholesale products and services. Click here for Course detail and registration information.

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Contacts

Service Request Order Processing

To discuss order processing or status, or to send associated information to the appropriate Center for processing, contact our Customer Service Centers. Based on the location of your end-user and the type of service you requested, Local or Access Services, our Service Center numbers are

- Service Requests for Interconnect Resale Services, Asynchronous Transfer Mode Services, Resale Frame Relay, Resale Centrex, Number Portability, INP, Unbundled Local Loops and Elements:

Location	Fax	Contact
ISC	888-796-9089	888-796-9087

- ASRs (e.g., LIS, SS7, STS) and Designed LSRs (e.g., DS1, DS3, some Centrex):

Location	Products & Services	Fax	Contacts
Des Moines	LIS Feature Group Private Line, Analog/Digital, HiCap Services (e.g., DS1, DS3, Sonet, SS7, SHARP, SHNS)	515-286-6160	888-537-0002 800-261-9838 800-244-1271
Salt Lake City	LIS Feature Group Private Line, Analog/Digital, HiCap Services (DS1, DS3, Sonet, SS7, SHARP, SHNS)	801-239-4070	800-335-5676 800-335-5676 800-270-6441
Minneapolis	Frame Relay	800-636-8721	800-285-8383

Qwest contact information is available in the Wholesale Customer Contacts

Qwest Wholesale Systems Help Desk can be contacted at 888-796-9102.

Note: Electronic System Interface Outage: In the case where IMA would be unavailable for an extended period of time, contact the Wholesale Systems Help Desk for assistance.

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Frequently Asked Questions (FAQs)

1. How are IMA status updates retrieved?
IMA retrieves status updates by the User ID of the person who submitted the service request. By default, this field contains the User ID of the person logged into IMA. If no User ID is entered, all User IDs for your company are returned. However, only two Statuses can be selected when viewing all User IDs. Status update messages can be displayed for up to 24 hours.

2. How do you issue a supplement to change a reserved appointment?
When your original service request has an appointment scheduled, the appointment must be changed before a supplement to change the Desired Due Date is accepted. Appointments are changed in IMA by using the Schedule Appointment option in Pre-Ordering and selecting a new appointment for the CCNA/PON on your service request.

3. Can a service requests be submitted in IMA when the service address does not exist in Qwest's address databases?
When your service request is a New (N) or Outside Move Transfer (T) Activity Type "ACT", and the address does not exist in Qwest's databases, you can use an override button (ANV= Y) to enter the address manually on the End-User Information, Centrex Resale Services, and Resale Private Line forms.

The override flags the address as Not Validated allowing you to submit the service request while alerting the ISC to process your service request manually. Your service request may be rejected if the address cannot be validated. The override flag is only used for New and Outside Move Transfer activity types. For all other activity types, if the address does not exit in Qwest's databases, contact the ISC for assistance.

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Last Update: July 8, 2002

Qwest cannot provide interLATA long distance service originating, interLATA 8XX service terminating; or interLATA private line or d either end in the states of AZ, CO, ID, IA, MN, MT, NE, NM, ND, OR, SD, UT, WA, and WY. Qwest provides Internet services in thes conjunction with a separately billed, required Global Service Provider (GSP).
On June 13th Qwest filed for approval to provide interLATA long distance in Colorado, Idaho, Iowa, North Dakota and Nebraska. Ur Telecommunications Act, decisions on pending applications are to be released 90 days from filing. Qwest's goal is to file for approv remaining nine states by the end of 2002.

DUPLICATE

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July 10, 2002

Peter D. Shields
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VIA HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: Notice of Permitted *Ex Parte* Presentation in CC Docket No. 02-148; Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota

Dear Ms. Dortch:

On behalf of Qwest Communications International, Inc. ("Qwest"), submitted herewith pursuant to Section 1.1206(b) of the Commission's rules are an original and two copies of this notice regarding a permitted *ex parte* presentation in the above-captioned proceeding. On July 8, 2002, Qwest met with the staff of the Department of Justice regarding various issues pertaining to Qwest's pending Section 271 application. The attached document covers the issues discussed at the meeting.

Sincerely,

Peter D. Shields

cc: Michael Carowitz
Elizabeth Yokus
Katherine Brown

DOJ EX PARTE

JULY 8, 2002

SECTION 271 APPLICATIONS FOR COLORADO, IDAHO, IOWA, NORTH DAKOTA, NEBRASKA

TAB 1

Question:

Provide more detail and support for the assertion that CLEC bills for UNE-P are auditable.

Answer:

Qwest's Wholesale bill formats are described in the Declaration of Lynn M. V. Notarianni and Christie L. Doherty, Operations Support Systems ("OSS Declaration").[1] Here we give further detail regarding the ability of CLECs to audit Wholesale bills for UNE-P today, including Wholesale bills provided in the Billing Output Specification ("BOS") format.[2]

It is worth noting at the outset that at no time during the many state workshops leading to Qwest's 271 application did a CLEC contend that Qwest's Wholesale bills are not auditable. Qwest fully meets the requirements of Section 271 in this area.

A. Bills Generated by CRIS Are Available in BOS Format

As explained in the OSS Declaration, Qwest uses the same system for billing Resale and UNE-P – CRIS – that it uses in the Retail context.[3] In response to an expressed interest by CLECs to receive bills in a format other than the one CRIS provides, Qwest recently began to provide CLECs with the option of receiving UNE-P bills in a BOS format. Qwest notified CLECs on April 19, 2002, that it would provide UNE-P bills in BOS format with a target production date as of July 1, 2002.[4] Qwest's April 19th notification was included in Appendix O, Volume 2 (1192.doc) of its Application, and also is provided here in Attachment 1. This BOS format billing option was reaffirmed in paragraph 498 of the OSS Declaration.

Bills generated through CRIS that are delivered to CLECs in a BOS format are compatible with the mechanized systems that certain carriers already have in

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1 *See* Consolidated Application for Authority to Provide In-Region, InterLATA Services in Colorado, Idaho, Iowa, Nebraska and North Dakota, WC Docket No. 02-148, filed June 13, 2002, ("Application") at Attachment 5, Appendix A.

2 The BOS format is provided in the following media: NDM; Web access; Diskette; and BDT. *See* OSS Declaration at ¶ 498. Some CLECs refer to the BOS format as "BOS-BDT" or Carrier Access Billing System ("CABS").

3 *See id.* at ¶ 491.

4 However, the only CLEC who has requested BOS format bills to date began the testing process June 1, 2002.

place to handle CABS bills. CLECs whose systems are not already set-up to accommodate the BOS format are more likely to prefer receiving CRIS bills in ASCII or EDI format.

Although the option of receiving CRIS bills in a BOS format was offered April 19, 2002, only one CLEC has asked to receive its (UNE-P POTS) bills in a BOS format to date.

B. Qwest Wholesale Bills Are Auditable

Qwest fully satisfies the FCC requirement that it "provide a wholesale bill that is 'readable, auditable and accurate' to satisfy its checklist obligations."[5] As explained in the OSS Declaration, Qwest provides Wholesale bills to CLECs in various formats.[6] These bills contain both summary level information and detailed information specific to each end-user level sub account.[7] The level of detail on these bills provides CLEC recipients with the information necessary to audit the bills for accuracy.

Charges for telecommunications service break down into three major types: (1) Monthly Recurring Charges; (2) Non-recurring and Fractional Charges (sometimes called "Other Charges & Credits," or "OCC"); and (3) Usage Charges. As explained more fully below, Qwest bills are fully auditable for all three types of charges.

1. Monthly Recurring Charges

Qwest's CRIS and BOS bill formats provide monthly services information necessary for purposes of verification.

Every CRIS Summary Bill, whether electronic or paper, contains a "Summary of Services" section that lists the total number of all the services billed in a given billing period.[8] For example, in Attachment 2 – which is an actual Colorado bill (the name and account number have been changed) – there were 73 Anonymous Caller Rejection Services (USOC AYK) billed; 36 Directory Listings (USOC CLT) billed; three 3-Way Call Transfers billed (USOC EO3), and so forth, in the billing period. Every billed USOC, regardless of sub account, is included here.

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5 *See New Jersey 271 Order* at ¶ 124, citing *Pennsylvania 271 Order* at ¶ 22.

6 *See* OSS Declaration at ¶ 498.

7 *See id.* at ¶¶ 494-495.

8 As explained in the OSS Declaration, "[f]or each state in which Qwest does business, CRIS provides CLECs with a Summary Bill for Resale products and/or a Summary Bill for each UNE product." *See id.* at ¶ 494.

This aggregation of information enables CLECs to validate at a summary level that their USOC quantities are correct.

To validate that monthly services are being billed correctly, a CLEC would begin by comparing the USOC quantity in the Summary of Service section of the Summary Bill (Attachment 2) to the USOC quantity the CLEC expected to see in its own records. If the USOC quantities matched, this would confirm the bill's accuracy. If the USOC quantities did not match, the CLEC could mechanically or manually look in the Itemized Service section of its sub-accounts and determine whether the service that was billed should in fact have been billed.

At the sub-account level, Qwest provides itemization of each monthly service billed for that particular sub-account. As is clear from Attachment 3, a CLEC can validate a particular sub-account by going to the "Itemized Service" section of that sub-account's page in the bill. The Itemized Service section provides a plain English description of each monthly service item billed for that sub-account and the rate for that service. This provides CLECs with the information they need to audit the monthly services billed for each sub-account.

The electronic bills can be loaded into publicly available software to mechanize their validation steps.[9] For instance, the ASCII format (which CLECs can receive via Web access, CD ROM or diskette) can be loaded into spreadsheet programs such as Microsoft Excel or Lotus 1-2-3 or database applications, such as Microsoft Access. An example of an ASCII bill that has been loaded into Excel by one of Qwest's customers is provided at Attachment 12. The EDI bill is compatible with commercially available software packages built to process EDI billing and can also be downloaded into the spreadsheet or database programs set forth above and merged with electronic CSR data. This process is described in Attachment 13.

The BOS format, which is typically accompanied by the CSR, provides an auditable level of detail on the bill. Attachment 4 and Attachment 5 contain an example of a BOS bill and BOS CSR, respectively.[10] Attachment 5 is the BOS-related component for the same account as is provided in Attachment 3. It lists every USOC with all the detail associated with the CSR, including additional information not required for bill validation (e.g., non-billable USOCs, non-rate-affecting FID information). The USOCs, which are listed in the "Code" column, together with the telephone number (which follow the "TN" entries throughout

9 *See id.* at ¶ 498 (identifying the various electronic formats available to CLECs for receiving CRIS bills). Although we have attached a paper version of the Summary Bill to this letter, the electronic version of BOS bills with Customer Service Records ("CSRs") provide the same information. CLECs that receive bills electronically can identify all the services billed and compare them to their expected results.

10 All BOS Bill examples are from Telcordia Technologies, SR 1871, CABS Billing Output Specifications, Volume 2 Service Exhibits. Issue 5, Revision 2, February 2002.

the CSR) are important for bill validation. The rate for each USOC, also important, is near the right hand side, near the bottom of each USOC's entry. To illustrate, in Attachment 5, the first USOC with a rate on this CSR is the U5R USOC that has a rate of $34.22. This is for telephone number 303-555-9991. This telephone number also has a PORXX USOC that bills $0.43. The USOCs for this line total $34.65. Telephone numbers 303-555-9992 and 303-555-9993 follow with the same billable USOCs totaling $34.65. The charges for these three telephone numbers total $103.95 on this account.

2. Non-Recurring and Fractional Charges

Qwest's CRIS and BOS bill formats provide fractional and non-recurring charges at a sub-account level. For CRIS bill formats, this information is provided in the "Service Addition and Changes" section (Attachment 6). The BOS bill provides this information in the "Other Charges and Credits" section (Attachment 7).

A side-by-side comparison of the two bills demonstrates that the audit-affecting information is the same:[11]

- The service order number for the change;
- The purchase order number (PON) from the CLEC's LSR;
- The service dates of the activity;
- The involved USOCs and their descriptions; and
- The net amount of the charge for the service order.

The presence of these items enables CLECs to audit the charges and verify that they are being billed accurately. To validate that these charges are correct, the CLEC would match the service order or PON number to its service records. The CLEC then would confirm that the service dates and USOCs are correct, and could validate the net amount billed by comparing the amount billed to its expected results.

3. Usage Charges

The third major type of charges on a bill is usage charges. Qwest's CRIS bill format summarizes categorized usage at a telephone number level rather than the CLLI Code level. This can been seen on Attachment 3. Providing usage charges at the telephone number level allows CLECs to validate the usage against the DUF records.

The local usage on Qwest's CRIS bill format is broken down into the two categories (MOU and Shared Transport) that affect the usage's rating. Qwest also

11 Qwest's CRIS bill format also provides the monthly rate associated with the USOCs added or removed with the order activity, information the BOS bill lacks.

provides call-by-call detail for all Qwest intraLATA toll calls and pay-per-use features, such as Last Call Return or Continuous Redial, that bill to the CLEC. Qwest provides this usage data to CLECs with the identical level of detail that Qwest provides to its Retail customers.

The BOS billing format provides summarized usage billing pursuant to industry guidelines. Attachment 8 reflects the content of the BOS usage billing. On the BOS bill, local switching usage is summarized at a Central Office CLLI Code level and broken down into categories similar to those on the CRIS bill format (MOU and Shared Transport).

4. Other Information

Qwest's CRIS and BOS bill formats also contain additional summary level information on payments and adjustments included in the summary bill. Attachment 9 shows an example of this in a CRIS bill format. Attachment 10 shows the comparable information for a BOS bill format.

C. KPMG's Third Party Test Confirms That Qwest's Wholesale Bills Are Auditable

KPMG's testimony in connection with its Third Party Test confirms that Qwest's CRIS format bills are auditable. First, KPMG has acknowledged that the very fact that it was able to conclude that Qwest's bills are accurate demonstrates that KPMG, and therefore presumably CLECs, could audit the bills.[12] This also was confirmed in the Vendor Technical Conference[13] and subsequent state proceedings.[14]

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12 *See* Application at Attachment 5, Appendix K, Testimony of Michael W. Weeks, Colorado Public Utilities Commission Proceeding, Docket No. 02M-260T, June 10, 2002, at 168 ("We validated the accuracy of [W]holesale bills delivered to the pseudo CLEC. . . . I think it speaks for itself, that, in fact, we did audit bills, so one could infer that they are auditable.").

13 *See* Application at Attachment 5, Appendix G, Testimony of Liz Fuccillo, ROC OSS Technical Vendor Conference No. 3, May 14, 2002 ("Q: [S]o a CLEC would be able to look at the resale bill and track calls made, through the DUF onto the bill, on a call by call basis. A: Yes. Q: But on a UNE-P bill it would not be able to do that; is that correct. A: [Y]ou could do it if we did it. And what you would have to do is add up the minutes of the use, apply the business rules and compare it to your bill."). For your convenience, a copy of the relevant pages of Ms. Fuccillo's testimony is included as Attachment 11.

14 *See, e.g.*, Testimony of Joe Della Torre, Qwest Corporation's Section 271 Application and Motion for Alternative Procedure to Manage the Section 271 Process, Utility Case No. 3269, July 1, 2002, at 121-22 ("The fact that we had to audit the bills in order to offer an opinion on their accuracy I think demonstrates that they are auditable); Testimony of Michael W. Weeks and Joe Della Torre, Washington Utilities and Transportation Commission Hearing, Docket No. UT-003022, UT-003040, Volume LVII, June 5, 2002, at 8090 ("We looked to determine whether the charge that appeared on the bill was appropriate and consistent with whatever tariffs or whatever rating mechanism controlled that particular line item. . . . [T]he design of the test was such that we knew in advance what charges should and should not appear on the bill and looked for both types of cases in the sense that if we expected a particular

KPMG's Final Report attests to the auditability of Qwest's bills. Test 20 evaluated in part the accuracy of Qwest's Wholesale bills.[15] KPMG evaluated Qwest's performance on a total of 27 Test Points as satisfactory.[16] In addition, for those Test Points that Qwest initially did not receive a satisfactory rating, KPMG closed/resolved all Exceptions and Observations relating to billing accuracy.[17]

Finally, although KPMG's Third Party Test did not examine specifically Qwest's offering of BOS format bills, because the CRIS format and BOS format bills provide the same information and come from the same data source, the two formats are equally auditable.

nonrecurring charge and it wasn't there, we would have raised that as an issue. And if we saw charges on the bill that we didn't understand the origin of, we would have investigated that as well.").

15 *See* OSS Declaration at ¶ 588.

16 *See id.* at ¶ 589.

17 *See id.* at ¶ 590 n.850 (listing the Exceptions and Observations).

Attachment 1

Notification of BOS format availability to CLECs

Qwest

Announcement Date:	**April 19, 2002**
Effective Date:	**Immediately**
Document Number:	**SYST.04.19.02.F.04033.IABS_R85_DftTechSpec**
Notification Category:	**Systems Notification**
Target Audience:	**CLECs, Resellers**
Subject:	**IABS Release 85 – Draft Technical Specifications**
Associated CR #:	**SCR090601**

Summary of Change:

Qwest will be supplying an additional option to have your UNE P bill and CSR data provided in the CABS/BOS format.

Qwest will be following TRG, CABS/BOS recommendations for implementation and population of the CABS/BOS records. The BOS Version being used at production will be Version 37. Information related to the CABS/BOS record format can be obtained from Telcordia at http://www.telcordia.com/

Comment Cycle:
Qwest is making this change to conform to Industry Standards. Therefore, there will be no documentation posted to the document review site. Please submit any comments on the timeline presented on this notification to Qwest via the following link: http://www.qwest.com/wholesale/cmp/comment.html. Fill in all required fields and be sure to reference the Notification Number listed above.

Timeline:

CLEC Comment Cycle begins	Details for providing comments are provided above	Available April 19, 2002
Qwest/CLEC Walk Through	Walk Through to provide an informational overview and answer CLEC questions. All relevant Qwest SMEs will be in attendance and CLEC SMEs are encouraged to participate.	1:00 -3:00 P.M. MDT, May 1, 2002 Conference Bridge: 888-725-8686 Conference ID : 1957586
CLEC Comment Cycle ends		5:00 p.m. MT, May 7, 2002
Final Notification issued		Available May 17, 2002
CLEC Testing Window Begins	Qwest will provide a test file and Differences List 30 days prior to the production installation.	Available June 1, 2002
Targeted Production Date		Available July 1, 2002

Sincerely,

Qwest

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Q west and the CLEC party to such interconnection agreement.

Attachment 2

"Summary of Services" Section of Summary Bill

Qwest

XX Solutions Co.

For questions, call 1-800-559-0634

Bill Date: Jun 13, 2002
Account No: K-303-111- 5678-901M

Summary Bill

SUMMARY OF SERVICES

QUANTITY	SERVICES	CODE
73	ANONYMOUS CALLER REJECTION	AYK
36	DIRECTORY LISTING	CLT
3	3-WAY CALL TRANSFER	EO3
37	3-WAY CALLING	ESC
55	CALL FORWARDING	ESM
39	CALL WAITING	ESX
1	CALL FORWARDING-BUSY LINE	EVB
2	CALL FORWARDING-DON'T ANSWER	EVDHG
2	CALL FWD-BUSY LINE/DON'T ANSW	EVF
43	CALL FORWARDING-BUSY LINE	EVO
12	30 NUMBER SPEED CALLING	E3D
10	8 NUMBER SPEED CALLING	E8C
12	ADDITIONAL LISTING IN ANOTHER DIRECTORY	FAL
4	CALL FORWARDING SERVICE	FBJ
1	CALL FORWARDING SERVICE	FDJ
4	CALL FORWARDING SERVICE	FVJ
7	CALL TRACE BLOCKING	HBG
14	CONTINUOUS REDIAL BLOCKING	HBQ
8	LAST CALL RETURN BLOCKING	HBS
117	HUNTING FEATURE	HTG
506	COLORADO OFFSET - SERVICE PROVIDER NUMBER PORTABILITY	LAWPA
7	SELECTIVE CALL FORWARDING	NCE
4	CALLER ID BLOCKING - PER LINE	NKM
1	NONLIST SERVICE	NLT
67	CALLER IDENTIFICATION	NNK
1	RESTORAL CHARGE	NPP
14	NON-PUBLISHED SERVICE	NPU
14	NON-PUBLISHED SERVICE AT NO CHARGE	NP3
16	PRIORITY CALL	NSK
38	LAST CALL RETURN	NSQ
36	CONTINUOUS REDIAL	NSS
19	CALL REJECTION	NSY
5	CALL ID ON CALL WAITING	NWT
506	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY	PORXX
1	EASY NUMBER	RNCEP
58	RESTRICTION OF 976 CALLS	RTVXN
1	BILLED NUMBER SCREENING	RTVXQ
1	10XXX DIRECT DIALED BLOCKING	RTVXY
2	LONG DISTANCE RESTRICTION	RTY
206	REBUNDLE SWITCHING & LOOP CLASS OF SERVICE	UHR
208	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, PRIMARY	U5R
295	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL	U5RAX
51	DISTANCE CHARGE	ZCB1X
7	3 WAY CALLING BLOCKING	38L

Attachment 3

"Itemized Service" Section of Summary Bill

QWEST RESALE/INTERCONNECT

For questions, call 1-800-559-0634

XX Solutions Co.
Bill Date. Jun 13, 2002
Account No. 303-555-9991-2408

- ITEMIZED SERVICE

1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL DEAVERAGED RATE ZONE 3		34 22
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL DEAVERAGED RATE ZONE 3		34 22
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, PRIMARY DEAVERAGED RATE ZONE 3		34.22
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		43
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		.43
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		43
		TOTAL	103.95

ACCOUNT DETAIL

MONTHLY SERVICE CHARGES		103.95
SERVICE ADDITIONS AND CHANGES		.00
INTERCONNECTION USAGE		.48
ITEMIZED CALLS		.00
PAY-PER USE FEATURES		.51
QWEST RESALE/INTERCONNECT	TOTAL	$104.94

MONTHLY SERVICE - JUN 13 THRU JUL 12 103.95
QWEST RESALE/INTERCONNECT SUBTOTAL OF MONTHLY SERVICE CHARGES $103.95

- INTERCONNECTION USAGE

LOCAL ORIGINATING MINUTES OF USE

USAGE FROM:	MINUTES
303 555-9991	15
303 555-9992	54
303 555-9993	187

NUMBER OF MINUTES	RATE PER MINUTE	
256	.0016100	.41

"Other Charges" categorized at TN level

SHARED TRANSPORT MINUTES OF USE

FOR YOUR INFORMATION:

303 555-9991	8 MINUTES
303 555-9992	15 MINUTES
303 555-9993	36 MINUTES

NUMBER OF MINUTES	RATE PER MINUTE	
59	.0011100	07
	SUBTOTAL	$.48

- PAY-PER-USE SERVICES

1	JUN 04 12:05P	LAST CALL RETURN ACTIVATION	51
		SUBTOTAL	.51

Attachment 4

Excerpt from Telcordia's Guidelines for the BOS paper bill format

BILL NO 203 J00-0200 976
INVOICE NO J000200976-98358
BILL DATE DEC 25, 1998
PAGE 1

ULEC CARRIER
ATTN UNBUNDLER
17 ANYWHERE LANE
ANY TOWN, NY 20102

BILLING AND ORDERING INQUIRIES, CALL (203) 694-7091

FOR TELCO USE:
ICSC OFC 93 R

SWITCHED ACCESS SERVICE
UNBUNDLED LINK PORT

* * * BALANCE DUE INFORMATION * * *

TOTAL AMOUNT OF LAST BILL		241.89
PAYMENTS APPLIED - SEE DETAIL		236.14CR
ADJUSTMENTS APPLIED - SEE DETAIL		
LOCAL	5.75CR	5.75CR
ZERO BALANCE DUE.		0.00

* * * DETAIL OF CURRENT CHARGES * * *

TOTAL - CONNECTICUT		
MONTHLY CHARGES FROM DEC 25 THRU JAN 24		
LOCAL	10.16	10.16
OTHER CHARGES AND CREDITS - SEE DETAIL		6.92
INTERSTATE	2.60	
INTRASTATE	2.60	
LOCAL	1.72	
USAGE CHARGES - SEE DETAIL		
LOCAL	2,638.15	2,638.15
TOTAL CURRENT CHARGES * DUE BY JAN 26 *		2,655.23
TOTAL AMOUNT DUE		2,655.23

Attachment 5

Sample BOS CSR

CUSTOMER SERVICE RECORD
(CSR) 303 555-9991 240
07-03-02 PAGE 1
XX LLC

BILLING INQUIRIES CALL	CLS SVC	BILL DAY	ACCT DATE	FOR TELCO USE
(800) 335-5672	UHR	1ST	07-01-02	033

---ACCOUNT IDENTIFICATION---

FOR TELCO USE: ACNA XXX LAT 658 TAR 1726 TAX B, D, J, H
PIU 100
MCN XXXMC00XXXXX

BILLED TO: XX SOLUTIONS
1500 4TH AVE RM:101
SEATTLE WA 98101

CUSTOMER SERVICE ADDRESSES: XX LLC
1-1708 E PIKE, MANITOBA, CO
1-MTNBCO00000
2-1122 3D AVE, COLORADO SPGS, CO
2-CLSPCO00000

---SERVICE AND FEATURES---

USOC column

SVC ESTBL	QTY	CODE	DESCRIPTION	TAX	AMOUNT	ACTVTY DATE
062701	1	UHR	/ZCID N16			050102
062701		TN	303 555-9991			062701
			/PICC 0555			
			/LPIC 0555			
			/NMC			
			/LCC LMB			
062701	1	U5R	/ZCID N16			062701
			/RTZ 2			
			/TN 303 555-9991			
			/PIC 0555			
			/LPIC 0555			
			/NMC			
			/LCC LMB			
			LOCAL 100% X	1 X	34.22	
062701	1	EVF	/ZCID N16			34.22
			/TN 303 555-9991			
			/CFN 555-9993			
			/RCYC 3			
062701	2	LAWPA	/ZCID N16			062701
			/TN 303 555-9991			
062701	2	PORXX	/ZCID N16			062701
			/TN 303 555-9991			
			LOCAL 100% X	1 X	.43	.43

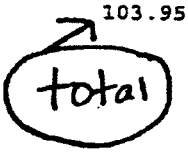
Telephone Number

USOC rate

LOCAL SUBTOTAL	34.65
TN SUBTOTAL	34.65

```
     062701       TN     303 555-9992
062701
                         /PICC 0555
                         /LPIC 0555
                         /NMC
                         /LCC LMB
     062701  1     U5RAX/ZCID N16
062701
                         /RTZ 2
                         /TN 303 555-9992
                         /PIC 0555
                         /LPIC 0555
                         /NMC
                         /LCC LMB
                       LOCAL 100% X           1 X      34.22
34.22
     062701  2     LAWPA/ZCID N16
062701
                         /TN 303 555-9992
     062701  2     PORXX/ZCID N16
062701
                         /TN 303 555-9992
                       LOCAL 100% X           1 X        .43
.43
                                 LOCAL SUBTOTAL                    34.65
                                   TN  SUBTOTAL                    34.65
     062701       TN     303 555-9993
062701
                         /PIC 0555
                         /LPIC 0555
                         /NMC
                         /LCC LMB
     062701  1     U5RAX/ZCID N16
062701
                         /RTZ 2
                         /TN 303 555-9993
                         /PIC 0555
                         /LPIC 0555
                         /NMC
                         /LCC LMB
                       LOCAL 100% X           1 X      34.22
34.22
     062701  1     EVO  /ZCID N16
                         /TN 303 555-9993
                         /CFNB 555-9991
                         /DES HTG TO 555-9991
     062701  2     LAWPA/ZCID N16
062701
                         /TN 303 555-9993
     062701  2     PORXX/ZCID N16
062701
                         /TN 303 555-9993
                       LOCAL 100% X           1 X        .43
.43
```

LOCAL SUBTOTAL	34.65
TN SUBTOTAL	34.65
ACCOUNT TOTAL	103.95



---SUMMARY---

ACTIVITY LEGEND

* - SERVICE ORDER ACTIVITY
D - REMOVAL EQUIPMENT
R - RATE CHANGE
Z - ZONE CHANGE
M - MISCELLANEOUS
P - JURISDICTIONAL FACTOR CHANGE
B - BIP CHANGE

TAX LEGEND

TYPE	APPLICABLE CODE	EXEMPT CODE
FEDERAL	1	B
STATE	2	C
CITY	3	D
COUNTY	4	E
STATE SALES	5	J
EXCISE TAX	6	G
FED UNV SF	7	F
UNVRSL SVC	9	K

CUSTOMER SERVICE RECORD
(CSR) 719 555-9991 991
07-03-02 PAGE

2

XX LLC

---SUMMARY---

ENGLISH LANGUAGE GLOSSARY

ACNA	ACCESS CUSTOMER NAME ABBREVIATION
ACTL	ACCESS CUSTOMER TERMINAL LOCATION
EVF	CALL FWD-BUSY LINE/DON'T ANSW
EVO	CALL FORWARDING-BUSY LINE
LAWPA	PROVIDER NUMBER PORTABILITY
PORXX	PROVIDER NUMBER PORTABILITY
TN	TELEPHONE NUMBER
UHR	SERVICE AND/OR EQUIPMENT
U5R	ANALOG LINE SIDE PORT, PRIMARY MEASURED LINE 2 WIRE LOOP
U5RAX	ANALOG LINE SIDE PORT, ADDL

Attachment 6

"Service Additions and Changes" Section of Summary Bill

QWEST RESALE/INTERCONNECT

For questions, call 1-800-559-0634

XX Solutions Co.
Bill Date: Jun 13, 2002
Account No: 719- 555-1234-175B

- ITEMIZED SERVICE

1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, PRIMARY DEAVERAGED RATE ZONE 2		13.79
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		.43
		TOTAL	14.22

ACCOUNT DETAIL

MONTHLY SERVICE CHARGES		14.78
SERVICE ADDITIONS AND CHANGES		26.75
INTERCONNECTION USAGE		1.15
QWEST RESALE/INTERCONNECT	TOTAL	$42.68

MONTHLY SERVICE - JUN 13 THRU JUL 12 — 14.22
MUNICIPAL CHARGE — .56
QWEST RESALE/INTERCONNECT SUBTOTAL OF MONTHLY SERVICE CHARGES — $14.78

SERVICE ADDITIONS AND CHANGES

service order number

net amount

SERVICE ORDER NO C84173175
1 MONTHLY SERVICE ADDITION AT 21.23 FROM 05-16-02 TO 06-13-02 — 18.40

Purchase order #

Service date

PON 7000511971UNEP				
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, PRIMARY	U5B	20.80	
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY	PORXX	.43	
		TOTAL	21.23	

USOC and Description

Monthly rate

2 SERVICE CHARGE ON 05-16-02 — 8.35
PON 7000511971UNEP
1 UNBUNDLED NETWORK MECHANIZED PROCESS - PRIMARY LINE — URCCU

A WHOLESALE DISCOUNT HAS BEEN APPLIED.

QWEST RESALE/INTERCONNECT SUBTOTAL - SERVICE ADDITIONS & CHANGES — $26.75

- INTERCONNECTION USAGE

LOCAL ORIGINATING MINUTES OF USE

USAGE FROM: 719 555-1234 . MINUTES 648

NUMBER OF MINUTES 648 . RATE PER MINUTE .0016100 — 1.04

SHARED TRANSPORT MINUTES OF USE

FOR YOUR INFORMATION: 719 555-1234 97 MINUTES

NUMBER OF MINUTES 97 . RATE PER MINUTE .0011100 — .11

SUBTOTAL — $1.15

QWEST RESALE/INTERCONNECT CURRENT CHARGES — $42.68

Attachment 7

"Other Charges and Credits" Section of BOS bill from Telcordia's Guidelines

BILL NO 203 J00-0200 976
INVOICE NO J000200976-98359
BILL DATE DEC 25, 1998
PAGE 4

* * * DETAIL OF OTHER CHARGES AND CREDITS * * *

service order #

purchase order #

		AMOUNT
DEC 14 98 SO C2537067 PON 562394		
ACCESS SERVICE GROUP 1 OCL HRFRCT03CG1 PIU 000 PLU 100		
CREDIT FOR ACCESS SERVICE REMOVED		
FROM DEC 14 98 THRU DEC 24 98 ← service date		
U4P 1 LINE SIDE PORT - 2 WIRE ANALOG POTS - RECURRING LOCAL - CT		.93CR
CHARGE FOR ACCESS SERVICE ADDED		
FROM DEC 14 98 THRU DEC 24 98		
U4P 1 LINE SIDE PORT - 3 WIRE ANALOG POTS - RECURRING LOCAL - CT		.93
PAUXX 1 CHANGE PIC CHOICE INTERSTATE - CT		.00
P1XXX 1 CHANGE LPIC CHOICE INTRASTATE - CT		.00
ONE TIME CHARGE		
FROM DEC 14 98 THRU DEC 14 98		
PAUXX 1 CHANGE PIC CHOICE INTERSTATE - CT		2.60
PA1XX 1 CHANGE LPIC CHOICE INTRASTATE - CT		2.60
NET EFFECT OF SO C2537067 PON 562394		
PER MONTH 0.00 / FRACTIONAL 0.00 / ONE TIME 5.20		BILLED AMOUNT 5.20
DEC 20 98 SO C2537121 PON 562456		
ACCESS SERVICE GROUP 1 OCL HRFRCT03CG1 PIU 000 PLU 100		
CREDIT FOR ACCESS SERVICE REMOVED		
FROM DEC 20 98 THRU DEC 24 98		
U4P 1 LINE SIDE PORT - 2 WIRE ANALOG POTS - RECURRING LOCAL - CT		.34CR
CHARGE FOR ACCESS SERVICE ADDED		
FROM DEC 20 98 THRU DEC 24 98		
U4P 1 LINE SIDE PORT - 2 WIRE ANALOG POTS - RECURRING LOCAL - CT		.34
UWC 1 CALL WAITING LOCAL - CT		.00
UFG 1 CALL FORWARD - VARIABLE LOCAL - CT		.00
U8R 1 SPEED CALL 8 LOCAL - CT		.00
U3V 1 THREE WAY CALLING LOCAL - CT		.00
		CONTINUED

usoc and description

net amount

INVOICE NO J000200976-98359
BILL DATE DEC 25, 1998
PAGE 5

* * * DETAIL OF OTHER CHARGES AND CREDITS * * *

		AMOUNT
	ONE TIME CHARGE	
	FROM DEC 20 98 THRU DEC 20 98	
UWC	1 CALL WAITING	
	LOCAL - CT	.43
UFG	1 CALL FORWARD - VARIABLE	
	LOCAL - CT	.43
U8R	1 SPEED CALL 8	
	LOCAL - CT	.43
U3V	1 THREE WAY CALLING	
	LOCAL - CT	.43

NET EFFECT OF SO C2837121 PON 562456

PER MONTH	FRACTIONAL	ONE TIME	BILLED AMOUNT
0.00	0.00	1.72	1.72

TOTAL OTHER CHARGES AND CREDITS. 6.92

Attachment 8

"Usage Charges" of BOS bill from Telcordia's Guidelines

CLLI code

BILL NO 203 J00-0200 976
INVOICE NO J000200976-98359
BILL DATE DEC 25, 1998
PAGE 6

* * * LOCAL USAGE FOR OFFICE HRFRCT03CG1 NOV 26 98 THRU DEC 25 98 * * *

RATE CATEGORY END OFFICE	QUANTITY	RATE	AMOUNT
LOCAL SWITCHING			
ON NET ROUTING			
ORIGINATING MINUTES	131,315	.004522	593.81
ORIGINATING 800 ILEC	45,262	.004522	204.67
TOTAL LS ON NET	176,577		798.48
OFF NET ROUTING			
ORIGINATING MINUTES	2,471	.002261	5.59
ORIGINATING IXC TOLL	100,231	.002261	226.62
ORIGINATING 800 IXC	126,793	.002261	286.68
ORIGINATING 500	421	.002261	.95
TERMINATING IXC TOLL	115,694	.002261	261.58
TOTAL LS OFF NET	345,610		781.42
OFF NET ROUTING - TANDEM			
ORIGINATING IXC TOLL	90,751	.002261	205.19
TOTAL LS OFF NET TANDEM	90,751		205.19
TOTAL LOCAL SWITCHING	612,938		1,785.09
TANDEM SWITCHING			
ORIGINATING IXC TOLL	90,751	.0020260	183.86
TOTAL TANDEM SWITCHING	90,751		183.86
TOTAL END OFFICE CHARGES			1,968.95
MISCELLANEOUS CHARGES			
800 DATA BASE PRO CHG	172,055	.003880	667.57
500 DATA BASE PRO CHG	421	.003880	1.63
TOTAL MISCELLANEOUS CHARGES			669.20
TOTAL LOCAL USAGE CHARGES FOR OFFICE HRFRCT03CG1			2,638.15

Categories of usage

****

TOTAL USAGE CHARGES FOR OFFICE HRFRCT03CG1 2,638.15

****

Attachment 9

"Payments and Adjustments" Portion of Summary Bill

Qwest.

For questions, call 1-800-559-0634

XX Solutions Co.
Bill Date: Jun 13, 2002
Account No: K-303-111-5678-901M

Summary Bill

SUMMARY OF ADJUSTMENTS

ACCOUNT	DATE	AMOUNT
9705557777123	JAN 25	38.02
	TOTAL ADJUSTMENTS	**$38.02**

SUMMARY OF PAYMENTS

DATE	ACCOUNT	AMOUNT	DATE	ACCOUNT	AMOUNT
JUN 03	303-111-5678	17,975.31-			
		TOTAL PAYMENTS			**$17,975.31-**

Attachment 10

"Payments and Adjustments" Portion of BOS bill

BILL NO	203 J00-0200 976
INVOICE NO	J000200976-98359
BILL DATE	DEC 25, 1998
PAGE	2

* * * DETAIL OF PAYMENTS APPLIED * * *

INVOICE NO J000200976-98329

DEC 24 98 PAYMENT APPLIED	236.14CR
TOTAL PAYMENTS APPLIED	236.14CR

* * * DETAIL OF ADJUSTMENTS APPLIED * * *

INVOICE NO J000200976-98329

DEC 10 98 ADJUSTMENT OF 800 DATA BASE PROCESSING CHARGE FROM NOV 25 98 THRU NOV 25 98 LOCAL - CT	3.00CR

INVOICE NO J000200976-98329

DEC 10 98 ADJUSTMENT OF 800 DATA BASE PROCESSING CHARGE FROM NOV 25 98 THRU NOV 25 98 LOCAL - CT	2.75CR
TOTAL CREDIT ADJUSTMENTS APPLIED	5.75CR
TOTAL DEBIT ADJUSTMENTS APPLIED	.00
TOTAL ADJUSTMENTS APPLIED	5.75CR

Attachment 11

Excerpt from ROC OSS Technical Vendor Conference #3

bills and UNE-P bills --

(Pause.)

MR. CONNOLLY: So the question is, the differences if any between the resale wholesale bills and the UNE-P wholesale bills relative to the presentation of the usage charges and records.

MS. FUCCILLO: I can answer that.

MR. DELLA TORRE: Give the mic over to Liz.

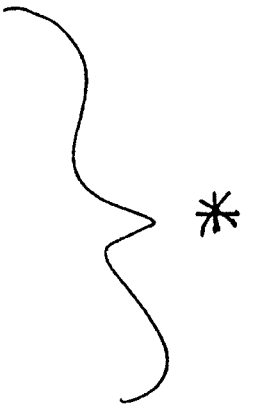
MS. FUCCILLO: The is Liz Fuccillo of KPMG. Resale bills, the call detail is on a per-call basis and identified as such, very similar to a retail bill.

For UNE-P the charges are aggregated on minutes of use. And so there is a difference between them in that regard.

MR. CONNOLLY: So when you are evaluating the -- so a CLEC would be able to look at a resale bill and track calls made, through the DUF onto the bill, on a call by call basis?

MS. FUCCILLO: Yes.

MR. CONNOLLY: But on a UNE-P bill it would not be able to do that; is that



correct.

MS. FUCCILLO: Well, yes, you could do it if we did it. And what you would have to do is add up the minutes of use, apply the business rules and compare it to your bill.

MR. CONNOLLY: So you couldn't take a record of a call like you guys did, find a DUF and then find that call detail record on the UNE-P bill?

MS. FUCCILLO: No, you could not.

MR. WEEKS: That is correct.

MS. FUCCILLO: (Inaduible.)

MR. CONNOLLY: Was that a product of your bill request to Qwest? Did you ask to be billed that way for those UNE-P calls?

Ms, FUCCILLO: No, we made no special request.

MR. CONNOLLY: Do you know if you can get the detailed bill of the UNE-P calls like you can the resale call detail?

MS. FUCCILLO: I am not aware that you can make such a request.

MR. CONNOLLY: Okay.

MR. WEEKS: Would Qwest like to comment on that?

Attachment 12

Portion of Microsoft Excel Spreadsheet Created by CLEC Customer from ASCII Bill

This attachment is a portion of a Microsoft Excel spreadsheet created by a CLEC from a Qwest-provided ASCII-format bill. The ASCII file is provided in a comma-delimited format. This type of file can simply be opened through the Excel application and then saved as an Excel file. Microsoft Excel is just one example. Other commonly available tools are Lotus 1-2-3 or Microsoft Access.

This spreadsheet contains the Monthly Service Section from an actual November bill. Qwest has added the column headings in order to easily identify particular fields that are relevant to the bill validation process.

The first 189 lines of data (rows 6 through 194) contain the Summary Bill-level itemization. For these lines, the first column, labeled "BTN," contains the summary bill account number. A paper bill version of this section is located in Attachment 2.

The remaining lines of data contain the itemized sub-account information. For these lines, the first column contains the sub-account account number and the column labeled "WTN" contains individual line numbers for that account. A paper bill version of this section is located in Attachment 3.

Colorado Qwest Billmate-Monserve (partial file due to large size of file)

BTN	Date		Dept Code	WTN	Ckt ID			Quant	USOC	Descr					Amt		
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16	#17	#18
3032056389291 2	11012001	0		3032375036		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032375036		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032375947		0	0	1	CLT	DIRECTORY LISTING			0		1.3	0	0
3032056389291 2	11012001	0		3032375947		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032375947		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032375947		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032375969		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032375969		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032375969		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032376047		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032376047		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032376047		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032376050		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032376050		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032376050		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032376060		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032376060		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032376060		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032376072		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032376072		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032376072		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032376130		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032376130		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032376130		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032376130		0	0	1	PFY	CALL FORWARDING OVER PRIVATE	FACL, PER MAIN STA LINE		0		0.08	0	0
3032056389291 2	11012001	0		3032376253		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032376253		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032376253		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032376555		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032376555		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032376555		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032376758		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032376758		0	0	1	R4N	CTX FMLY NON-BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032376758		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032376982		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032376982		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032376982		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032377409		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032377409		0	0	1	R4N	CTX FMLY NON-BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032377409		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032377510		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032377510		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032377511		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032377511		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032377511		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032377720		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032377720		0	0	1	R4N	CTX FMLY NON-BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032377720		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032377729		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032377729		0	0	1	R4N	CTX FMLY NON-BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032377729		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032377829		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032377833		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032377880		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032377880		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032378161		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032378161		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032378161		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032378846		0	0	7	FAL	ADDITIONAL LISTING IN ANOTHER	DIRECTORY		0		9.1	0	0
3032056389291 2	11012001	0		3032378846		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032378846		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032378846		0	0	1	AWT	MESSAGE WAITING INDICATION			0		0.84	0	0
3032056389291 2	11012001	0		3032378847		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032378847		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032378847		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032378917		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032378917		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032378917		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0

Colorado Qwest Billmate-Monserve (partial file due to large size of file)

BTN	Date		Dept Code	WTN	Ckt ID			Quant	USOC	Descr					Amt		
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16	#17	#18
3032056389291 2	11012001	0		3032378944		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032378944		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032378944		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032379617		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032379617		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032379617		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032380215		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032380215		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032380215		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032380243		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032380243		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032380243		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032380421		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032380421		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032380421		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032380594		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032380594		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032380594		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032380690		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032380690		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032380690		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032380804		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032380804		0	0	1	R4N	CTX FMLY NON-BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032380804		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032380890		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032380890		0	0	1	R4N	CTX FMLY NON-BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032380890		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032381115		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032381115		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032381115		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032381154		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032381154		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032381154		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032381256		0	0	1	CLT	DIRECTORY LISTING			0		1.3	0	0
3032056389291 2	11012001	0		3032381256		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032381256		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032381256		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032381315		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032381315		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032381315		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032381362		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032381362		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032381362		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032381363		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032381363		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032381363		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032381369		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032381369		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032381369		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032381551		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032381551		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032381551		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032381749		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032381749		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032381749		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032381805		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032381805		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032381805		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032382754		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032382754		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032382754		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032382964		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032382964		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032382964		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032383000		0	0	1	CLT	DIRECTORY LISTING			0		1.3	0	0
3032056389291 2	11012001	0		3032383000		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032383000		0	0	1	R4N	CTX FMLY NON-BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032383000		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0

Colorado Qwest Billmate-Monserve (partial file due to large size of file)

BTN	Date		Dept Code	WTN	Ckt ID			Quant	USOC	Descr					Amt		
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16	#17	#18
3032056389291 2	11012001	0		3032383004		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032383004		0	0	1	R4N	CTX FMLY NON-BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032383004		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032383332		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032383332		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032383332		0	0	1	NNK	CALLER IDENTIFICATION			0		5.44	0	0
3032056389291 2	11012001	0		3032383500		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032383500		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032383500		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032383800		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032383800		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032383800		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384000		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384000		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384000		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384192		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384192		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384246		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384246		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384246		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384268		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384268		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384268		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384402		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384402		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384402		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384406		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384406		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384406		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384418		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384418		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384418		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384431		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384431		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384431		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384490		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384490		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384490		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384498		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384498		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384498		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384832		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384832		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384832		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384855		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384855		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384855		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032384900		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032384900		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032384900		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032385197		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032385197		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032385197		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032385284		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032385284		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032385284		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032385590		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032385590		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032385590		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032385592		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032385592		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032385592		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032385630		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032385630		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032385630		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032385641		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032385641		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032385641		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0

Colorado Qwest Billmate-Monserve (partial file due to large size of file)

BTN	Date		Dept Code	WTN	Ckt ID			Quant	USOC	Descr					Amt		
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16	#17	#18
3032056389291 2	11012001	0		3032385669		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032385669		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032385669		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032385689		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032385689		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032385689		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032385755		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032385755		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032385755		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032385966		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032385966		0	0	1	R4N	CTX FMLY NON-BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032385966		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032386500		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032386500		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032386500		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032386818		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032386818		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032386818		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032386950		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032386950		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032386950		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032386951		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032386951		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032386951		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032386958		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032386958		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032386958		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032386959		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032386959		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032386959		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032387150		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032387150		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032387150		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032387151		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032387151		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032387151		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032387151		0	0	2	WFA	800 SERVICELINE(SM) FEATURE			0		8.5	0	0
3032056389291 2	11012001	0		3032387793		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032387793		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032387793		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032387794		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032387794		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032387794		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032387853		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032387853		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032388111		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032388111		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032388111		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032388111		0	0	1	RTY	LONG DISTANCE RESTRICTION			0		3.42	0	0
3032056389291 2	11012001	0		3032388111		0	0	1	REB8X	CENTREX SUBSCRIBER PICC CHARGE			0		0.13	0	0
3032056389291 2	11012001	0		3032388482		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032388482		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032388482		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032388560		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032388560		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032388560		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032388561		0	0	1	CLT	DIRECTORY LISTING			0		1.56	0	0
3032056389291 2	11012001	0		3032388561		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032388561		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032388561		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032388608		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032388608		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032388608		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032388660		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032388660		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032388660		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032389689		0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY		0		0.43	0	0
3032056389291 2	11012001	0		3032389689		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0

Colorado Qwest Billmate-Monserve (partial file due to large size of file)

BTN	Date		Dept Code	WTN	Ckt ID			Quant	USOC	Descr					Amt		
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16	#17	#18
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3032056389291 2	11012001	0		3032390584		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
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3032056389291 2	11012001	0		3032390587		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
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3032056389291 2	11012001	0		3032390604		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
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3032056389291 2	11012001	0		3032390624		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
3032056389291 2	11012001	0		3032390807		0	0	1	CLT	DIRECTORY LISTING			0		1.3	0	0
3032056389291 2	11012001	0		3032390807		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032390807		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
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3032056389291 2	11012001	0		3032398096		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
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3032056389291 2	11012001	0		3032398453		0	0	1	RKY	CTX FMLY BLOCKED MAIN	STATION LINE, EACH		0		15.17	0	0
3032056389291 2	11012001	0		3032398453		0	0	1	SFJXM	SERVICE AND/OR EQUIPMENT			0		1.69	0	0
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Colorado Qwest Billmate-Monserve (partial file due to large size of file)																		
BTN	Date		Dept Code	WTN	Ckt ID			Quant	USOC	Descr						Amt		
#1	#2	#3	#4	#5	#6	#7	#8	#9	#10	#11	#12	#13	#14	#15	#16		#17	#18
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Attachment 13

Options for Validating Qwest's EDI Bills with Electronic CSR

As a preliminary matter, it is worth noting that the CLEC may choose to validate its EDI bill in-house or by outsourcing the task. UPS is just one of the many vendors that provide this service. (*See* http://www.ups-psi.com/dts.asp). Whether handled internally or externally, validation of the EDI bill is very similar to the process used for validation of BOS-formatted bills.

The first step is to convert the EDI bill to a spreadsheet format, such as Excel. The EDI bill can be converted to a spreadsheet format through a variety of commercially available software. Two examples are GE's GXS-AI (Global eXchange Services – Application Integrator) and EDI Complete Professional v3.6.4.

We have attached information related to the GE products here. Additional information can be found on the GE and EDI websites (*See* http://www.gxs.com/frame.htm?wstat=0&curl=http://www.gxs.com/index.jsp and http://www.1edisource.com/). In fact, Qwest will convert to the GE-GXS-AI package in September 2002, and will use the new system to convert CRIS billing data into the EDI format that is presently provided to CLECs. Because this type of software provides an integrated function, it can clearly be used, and is used, by CLECs to download the EDI bills into a format that is easy to review.

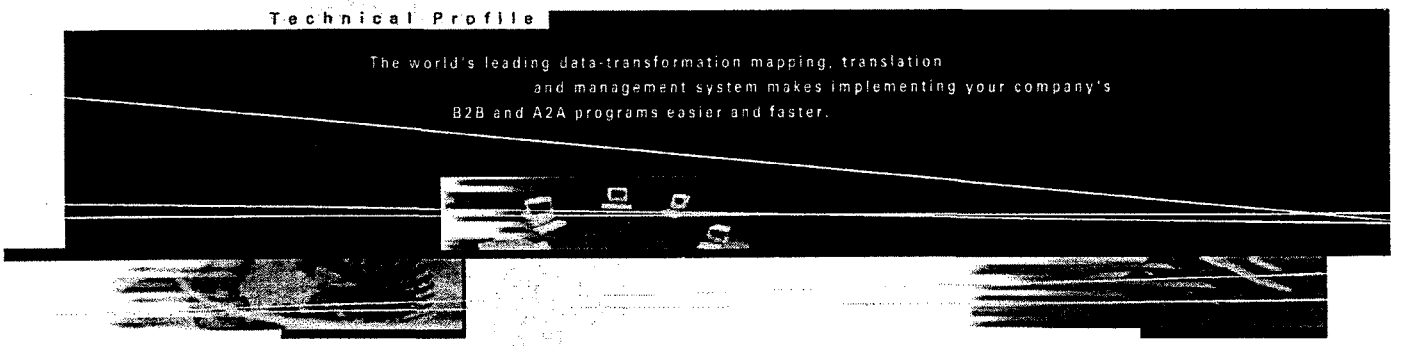
The second step is to convert the electronic CSR to a spreadsheet format, such as Excel. The electronic CSR is available in an ASCII format. An ASCII file can be opened through the Microsoft Excel application and then saved as an Excel file.

Once the two Excel documents are merged, all summary and sub-account information that is necessary for bill validation is available for examination, manipulation, and analysis.

Application Integrator™

Data Mapping and Translation to Empower Your E-Commerce Business Objectives

Technical Profile



- Full XML mapping and data-transformation capabilities provide a quick and easy method for extending your business-to-business (B2B) and application-to-application (A2A) programs
- Powerful yet user-friendly technology offers a next-generation mapping, translation and management tool whose intuitive interface uses "drag and drop" mapping technology
- Scalable Enterprise Application Integration (EAI) functionality provides the solution you need today while growing as your company's needs evolve
- Full standards support to meet all of your B2B and A2A needs, including XML, RosettaNet, xCBL, EDI, EIAJ and EDIFACT

Supported Platforms
HPUX, AIX, Solaris, DEC, NT, Windows

Server Requirements
- Minimum 200 MHz (450 MHz recommended)
- 128 Mb memory
- 100 Mb available disk space

Desktop Requirements
- Minimum 200 MHz Pentium II PC
- Recommended 450 MHz Pentium III PC
- 128 Mb memory
- 100 Mb available disk space

GE Global eXchange Services' (GXS) Application Integrator is a powerful, intuitive software solution that improves your productivity by offering any-to-any mapping, data translation, platform independence and rapid implementation. With a newly developed, intuitive graphical user interface (GUI), Application Integrator is an easy-to-use, flexible system that enables your company to accomplish XML, EDI and any-to-any data transformation and quickly set up trading and other business partners to participate in today's e-commerce marketplace.

The functionality of Application Integrator includes the key features that have made Application Integrator one of the most scalable and powerful mapping and translation software solutions on the market:

Feature	Benefit	Competitive Advantage
Drag-and-Drop Mapping Tool	Combines ease of use and simplicity with the level of sophistication you need to define business rules unique to your business partners	Reduces the potential for introducing errors into transactions
High-Performance, One-Pass Data Translation	Fully exploit mission-critical, real-time applications where latency is an important issue	Impressive mapping and translation speed - so you get the information needed right away
Fully Scalable	Meet today's-and tomorrow's-transaction needs no matter how great the volume	No need to buy a new mapping and translation tool as your company's integration needs evolve
XML Capability	Import XML DTDs to speed and simplify your XML implementation	Quickly jump start your company's XML program
Numerous XML Plug-Ins Available	Readily implement XML exchanges including xCBL, RosettaNet, EDIml and more	Integrate your internal systems with multiple XML dialects to stay ahead of the B2B XML explosion.
Platform Independence	Fully supports NT, Windows 2000 and Unix (HP, IBM, Sun, Compaq). You can implement your B2B program regardless of platform and without concern about platform changes	Works with your current IT investments - no matter how you've set up your network
Complete B2B Support	Standardize on a single product for all your A2A and B2B requirements because it supports most standards: XML, RosettaNet, xCBL, EDI, ANSI, EDIFACT, TRADACOMS, EIAJ, UCS, VICS, EANCOM and others	Communicate with anyone in any IT language
Environment Flexibility	Three separate environments-development, test and production-simplify compliance with your company's change control processes	Complies with your company's audit requirements and ensures error-free implementation
Fully Internationalized	Available I18N Plug-In extends Application Integrator's capabilities to enable B2B and A2A with over 30 fully supported double and multi-byte character sets, such as UTF8 and IBM EBCDIC as well as Chinese, Japanese and Korean, among many others	Worldwide access for building a global mapping and translation system

For more information about Application Integrator or any other GXS product or service, please call your account representative or the appropriate telephone number below, or visit our Web site at www.gegxs.com .

The General Electric Advantage

GE Global eXchange Services (GXS) operates one of the largest B2B e-commerce networks in the world, with more than 100,000 trading partners. The network's 1 billion annual transactions account for $1 trillion in goods and services. With a presence in 58 countries, GXS applies Six Sigma quality processes to provide e-commerce solutions that help businesses around the globe remove costs from their supply chains. GE Global eXchange Services is a part of the General Electric Company, U.S.A., and is headquartered in Gaithersburg, Md. Visit our Web site at www.gegxs.com.

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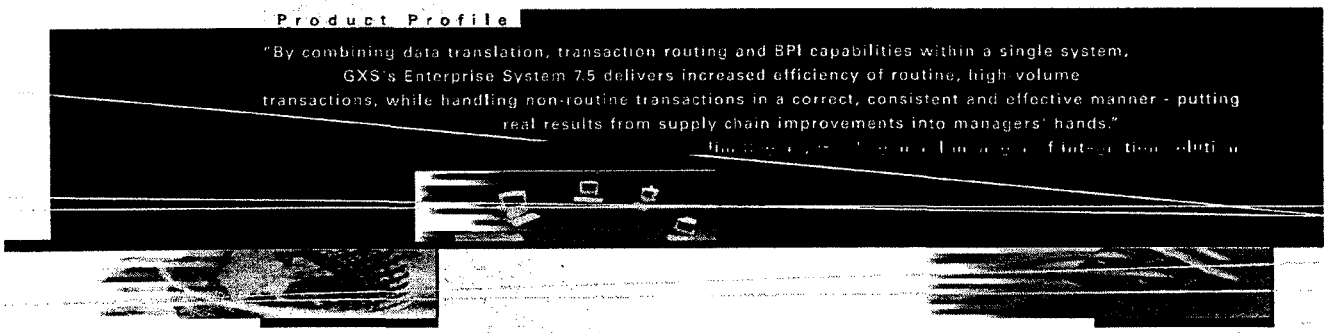
Enterprise System™

End-to-End Supply Chain Process Visibility



Enterprise System™ - Move, View and Act

GE Global eXchange Services' (GXS) Enterprise System™ is a scalable, reliable data integration broker that handles transaction messaging between your business partners and internal applications. It enables companies to "Move, View and Act" on transaction traffic in order to streamline operations to solve supply chain problems.

Example Document errors and slow transactions between a retail buyer and its suppliers can lead to lost sales through stock-outs on store shelves. Enterprise System supports the following capabilities to help a retail business manager reduce inventory stock-outs through improved handling of exceptions (errors) in inventory replenishment transactions:

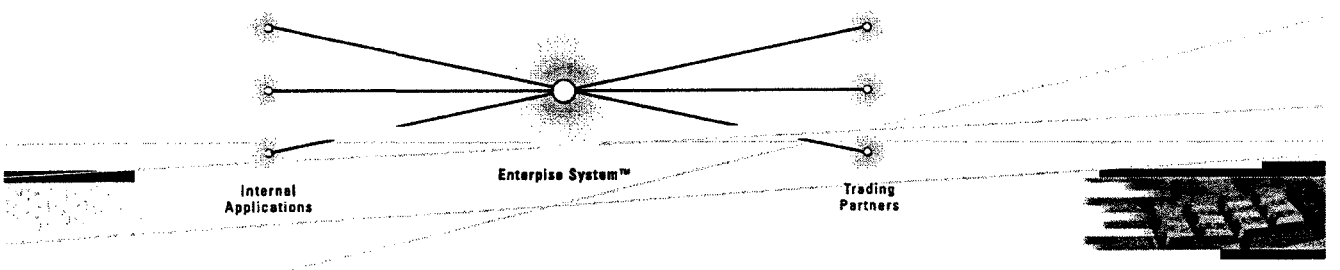
- Move - Systems integration enables transactions (such as invoices and purchase orders) to be moved efficiently between a buyer and its suppliers through transformation into virtually any data format, secure data routing, and integration into back-office systems.
- View - User-created business rules and process flows support both human and machine interactions, such as identifying exceptions within the data transaction flow, providing visibility into exceptions through Web reports, and handling specified categories of exceptions automatically in a pre-determined manner.
- Act - Processes can be automated and improved, and exceptions requiring human intervention can be escalated to the correct enterprise decision-makers via Web browser for appropriate action.

Extend the reach of your e-commerce program to all of your trading partners

- Align business processes with corporate objectives
- Extend both your XML and EDI capabilities
- Ramp 100% of your supply chain
- Scale the solution to reach tens of thousands of your trading partners
- Experience one of the fastest data transformation capabilities on the planet
- Rely on Six Sigma quality

How Enterprise System Works

Enterprise System intelligently separates the data from its communication protocol, transforms the transaction, and then routes it to its destination. Enterprise System also offers key tracking and monitoring functions to reliably and securely support essential business communication protocols and transactions.



Why GXS's Enterprise System?

Ability to Align Business Processes with Corporate Objectives GXS's data integration broker software incorporates Business Process Integration (BPI) capabilities, enabling companies to map supply chain processes to specific business objectives, measure purchasing patterns, view specified supply chain metrics and proactively escalate issues to decision-makers.

Fast and Highly Scalable Solution Enterprise System contains GXS's patented Application Integrator™ technology. Application Integrator is one of the fastest data transformation technologies on the planet. Enterprise proactively communicates in real-time, not by "batch".

Expansive Reach of Data Formats and Communication Protocols Application Integrator allows you to translate a significant and growing variety of data formats. Combined with Enterprise System, you can send and receive data in just about any format using just about any protocol.

Ability to Reach 100% of Your Trading Community Enterprise System can help you reach 100% of your trading community. Whether they communicate by e-mail, FAX, Internet, eXtensible markup language (XML), electronic data interchange (EDI), AS2, or others, GXS can help you ramp them onto our massive trading community of 100,000 trading partners.

The Enterprise Advantage

From Argentina to China to Zimbabwe, hundreds of companies have trusted GXS to expand their e-commerce efforts and streamline business processes. Enterprise System can deliver to your company the power to achieve critical integration goals.

About GE Global eXchange Services

GE Global eXchange Services (GXS) provides e-commerce solutions that help businesses around the globe drive cost from their supply chains. A part of GE, GXS operates one of the largest B2B e-commerce networks in the world, with more than 100,000 trading partners.

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TAB 2

Question:

Provide a record cite for the planned change to CRIS billing on July 1, 2002.

Answer:

The cite to the planned change to CRIS billing is Appendix O, volume 2, 1192.doc (O_2_1192.doc). It is attached.

Qwest notified the CLEC community via the attached notification on April 19, 2002 that CRIS Summary bills would be available in BOS format for UNE-P on July 1, 2002. The capability was in fact added on July 1, 2002.

We have also included a May 16, 2002 notification, the Final Technical Specifications, for the planned change to the BOS format, and the July 1, 2002 notification stating that this capability has been released in to production.

In addition, the availability of CRIS Summary Bills in BOS format for UNE-P was referenced in our filing under Checklist Item 2: OSS -- Lynn M. V. Notarianni and Christie Doherty, paragraph 498, which is also attached.

Qwest

Announcement Date:	**April 19, 2002**
Effective Date:	**Immediately**
Document Number:	**SYST.04.19.02.F.04033.IABS_R85_DftTechSpec**
Notification Category:	**Systems Notification**
Target Audience:	**CLECs, Resellers**
Subject:	**IABS Release 85 – Draft Technical Specifications**
Associated CR #:	**SCR090601**

Summary of Change:

Qwest will be supplying an additional option to have your UNE P bill and CSR data provided in the CABS/BOS format.

Qwest will be following TRG, CABS/BOS recommendations for implementation and population of the CABS/BOS records. The BOS Version being used at production will be Version 37. Information related to the CABS/BOS record format can be obtained from Telcordia at http://www.telcordia.com/

Comment Cycle:
Qwest is making this change to conform to Industry Standards. Therefore, there will be no documentation posted to the document review site. Please submit any comments on the timeline presented on this notification to Qwest via the following link: http://www.qwest.com/wholesale/cmp/comment.html. Fill in all required fields and be sure to reference the Notification Number listed above.

Timeline:

CLEC Comment Cycle begins	Details for providing comments are provided above	Available April 19, 2002
Qwest/CLEC Walk Through	Walk Through to provide an informational overview and answer CLEC questions. All relevant Qwest SMEs will be in attendance and CLEC SMEs are encouraged to participate.	1:00 -3:00 P.M. MDT, May 1, 2002 Conference Bridge: 888-725-8686 Conference ID : 1957586
CLEC Comment Cycle ends		5:00 p.m. MT, May 7, 2002
Final Notification issued		Available May 17, 2002
CLEC Testing Window Begins	Qwest will provide a test file and Differences List 30 days prior to the production installation.	Available June 1, 2002
Targeted Production Date		Available July 1, 2002

Sincerely,

Qwest

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Q west and the CLEC party to such interconnection agreement.

AH, 2-A

Qwest

Announcement Date: May 16, 2002
Effective Date: May 17, 2002

Notification Number: SYST.05.16.02.F.04058.IABS_Final_TechSpec
Notification Category: Systems Notification
Target Audience: CLECs, Resellers

Subject: CMP – Systems: IABS Release 85– Final Technical Specifications

Associated CR # or System Name and Number: SCR090601-01

On May 17, 2002, Qwest will post the Final Technical Specifications to allow Customers the option to have their UNE P bill and CSR data provided in the CABS/BOS format targeted for implementation on July 1, 2002. Details of this option will be posted to the Qwest Wholesale Document Review site.

Summary of Change:
Qwest will be following TRG, CABS/BOS recommendations for implementation and population of the CABS/BOS records. The BOS Version being used at production will be Version 37. Information related to the CABS/BOS record format can be obtained from Telcordia at http://www.telcordia.com/.

Final Joint Test Plan:
Test files will be available on June 1, 2002. A test file will be sent provided a CLEC has NDM capability with Qwest today. If a CLEC does not currently have NDM capability today, then it is possible that it could take up to six weeks to establish the connectivity with Qwest. For information regarding Interactive testing with Qwest please contact Catriona Dowling @ 303-624-0528 or e-mail cdowlin@qwest.com.

Comment Response:
The Qwest Response to CLEC comments on the original notification and walk through will be posted on May 17, 2002 to the Document Review web site under the heading of "Qwest Responses to CLEC Comments on Documents in Review." This response will be listed within the Systems Documents section. The URL is http://www.qwest.com/wholesale/cmp/review.html.

If you have any questions on this subject, please submit comments though the following link: http://www.qwest.com/wholesale/cmp/comment.html.

Timeline:

Final Technical Specifications	Includes Qwest response to comments and the CABS/BOS Format for UNE P presentation	Available May 17, 2002
CLEC Testing Window Begins	Qwest will provide a test file and a differences list 30 days prior to the implementation date.	Available June 1, 2002
Targeted Production Date		Available July 1, 2002

Sincerely,

Qwest

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Q west and the CLEC party.

Att. 2-B

Qwest

Announcement Date:	**July 1, 2002**
Effective Date:	**Immediately**
Notification Number:	**SYST.07.01.02.F.04099.IABS_FinalRelease**
Notification Category:	**Systems Notification**
Target Audience:	**CLECs, Resellers**
Subject:	**CMP – Systems– Final Notification for IABS Release 85**
Associated CR # or System Name and Number	**SCR 090601-01**

In accordance with industry standards, Qwest is providing Wholesale Customers the option to have their UNE P bill and CSR data provided in the CABS/BOS format. This option (SCR 090601-01) has been released into Production effective July 1, 2002.

Summary of Change:
Qwest will be following Technical Review Group (TRG), CABS/BOS recommendations for implementation and population of the CABS/BOS records. The BOS Version being used at production will be Version 37. Information related to the CABS/BOS record format can be obtained from Telcordia at http://www.telcordia.com/.

Test Plan:
A test file will be sent provided a CLEC has NDM capability with Qwest today. If a CLEC does not currently have NDM capability today, it could take up to six weeks to establish the connectivity with Qwest. For information regarding Interactive testing with Qwest, please contact Catriona Dowling on 303-624-0528 or e-mail cdowlin@qwest.com.

If you have any questions on this subject, please submit comments through the following link: http://www.qwest.com/wholesale/cmp/comment.html.

Sincerely,

Qwest

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party.

Att. 2-C

498. CLECs may choose the following electronic formats and transmission methods for receipt of the CRIS Summary Bill: [702]

- EDI format via
  - ❖ VAN;
  - ❖ NDM, using a dedicated circuit or dial-up access;
  - ❖ FTP; or
  - ❖ Web access;
- ASCII format via
  - ❖ Web access;
  - ❖ CD ROM; [703] or
  - ❖ Diskette;
- BOS format for UNE-P via
  - ❖ NDM;
  - ❖ Web access;
  - ❖ Diskette; or
  - ❖ BDT.

The EDI format is compatible with commercially available analysis software. The ASCII format is easily loaded into many spreadsheet or database software packages for analysis.

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[702] *See* Billing – Customer Records and Information System (CRIS) – V10.0, Description, Bill Formats, *available at* www.qwest.com/wholesale/clecs/cris.html. *See* Exh. CLD-OSS-30 (CRIS Screen Shot).

[703] Qwest makes CRIS bills available on ASCII format via CD ROM to any CLEC receiving bills over $10,000 in charges on a single product line. *See id.*

AH. 2-D

TAB 3

Question:

Provide a summary of DUF test history.

Answer:

Summary of DUF Test History

I. KPMG DUF Test 1 & 2

Stopped due to test bed problems. No test calls were actually made.

II. KPMG DUF Test 3: June 11 – June 29, 2001

Qwest Billing System Changes:

- Created and subsequently enhanced a Pending Order File ("POF") process to allow usage to be held when the involved TN converts from one LEC to another;
- Fixed occasional creation of duplicate records; and
- Correctly formatted credit records on the DUF.

III. KPMG DUF Test 4: October 28 – November 1, 2001

Qwest Billing System Changes:

- Fixed POF processing related to certain measured service records;
- Augmented Eastern Region toll guide data;
- Modified 8XX business rules to ensure DUF records are correctly populated;
- Changed processing to correctly identify EAS calls as local on the DUF; correctly populate the rate class field on DUF records; and fixed problem related to the distance calculation of local measured service calls; and
- Fixed the message investigation process to ensure records were handled correctly.

IV. KPMG DUF Test 5: January 7 – January 11, 2002

Qwest passed Test 5 in its Eastern and Western Regions.

Qwest Billing System Changes to Central Region:

- Fixed condition specific to C-order conversions to UNE-P when the C-order posted in CRIS on a Thursday or Friday;

- Amended the POF process for operator-assisted local calls to assure only a local DUF record was created; and

- Fixed DUF processing for alternately-billed calls originating from a UNE-P line.

V. KPMG DUF Test 6: March 11 – March 15, 2002

Qwest passed Test 6.

Cap Gemini supplemental DUF testing took place January - April 2002. Qwest passed this DUF test as reported in its Final Report of the Qwest OSS Test -- Section 2.4.5, Revised April 24, 2002 (attached).

Final Report of the Qwest OSS Test – Section 2.4.5, Revised April 24, 2002

April 24, 2002
Prepared For:
Arizona Corporation Commission

Cap Gemini Telecom Media & Networks U.S., Inc.
One Panorama Center
7701 Las Colinas Ridge
Suite 300
Irving, TX 75063

Att. 3-A

2.4.5 Supplemental DUF Evaluation

Scope

CGE&Y conducted a controlled supplemental test of the accuracy and timeliness of the provisioning of Daily Usage File (DUF) records in Arizona. This supplemental effort was to ensure that no DUF issues existed in Arizona after DUF processing updates were made by Qwest that affected their entire operating area. These system updates occurred from September 2001 through December 2001.

CGE&Y's Supplemental DUF Evaluation was conducted from January through April 2002. CGE&Y generated test calls during and after account migrations and then reviewed the DUF records received. As a result of this review, four IWOs were issued (AZIWO1215, AZIWO2127, AZIWO2128 and AZIWO2129). CGE&Y received Qwest's responses to the IWOs, indicating that system fixes had been implemented on February 7, 18 and March 28; and a process change had been implemented on March 22, 2002. CGE&Y retested and closed AZIWO2127, AZIWO2128, AZIWO1215 and AZIWO2129.

Process

Order and Call Generation

CGE&Y generated order scripts for the initial test and retest. The order scripts were used by the Pseudo-CLEC to issue LSRs that migrated 12 CGE&Y and 3 HP local retail employee lines to wholesale HPC accounts.[1] For the retest, only the 12 CGE&Y accounts were used. CGE&Y and HP accounts were selected to closely control adherence to the test call scripts.

The test calls for the initial test were conducted during the period of January 22 through January 31, 2002.[1] The retest period was March 13, 2002 through April 2, 2002.[2] The types of calls made to generate both access and usage records included:

- InterLATA
- IntraLATA toll
- 900/976 Calls

[1] Test Call Logs for the initial test are located on CGE&Y Archive CD: Supplemental DUF Evaluation, Supplemental DUF Evaluation Update.

[2] Test Call Logs for the Retest are located on CGE&Y Archive CD: Supplemental DUF Evaluation Retest.

- 8xx (WATS)
- Local Directory Assistance
- Local Directory Assistance Connect
- Toll Directory Assistance
- Toll Credit Request
- Usage sensitive CLASS features
- Terminating InterLATA
- Terminating IntraLATA toll
- Local Measured Service
- Verify InterLATA Carrier
- Verify IntraLATA Carrier

Pseudo-CLEC DUF Record Processing

As discussed in Section 2.4.3 above, the Pseudo-CLEC received DUFs from Qwest for test accounts. The Pseudo-CLEC process for receiving DUFs was implemented in June 2000 and was based on the Pseudo-CLEC's understanding that "U S WEST (Qwest) uses the EMI standard for the Daily Usage File." At that time, Qwest had implemented EMI Version 17, dated April 2000. The Pseudo-CLEC implemented the process of receiving the DUFs via NDM on a dedicated T-1 connection with Qwest. For this implementation, the Pseudo-CLEC incorporated Qwest's variations to the EMI standards for Version 17 that Qwest detailed in their document, "Usage Exception Matrix.doc." This document was provided to the Pseudo-CLEC via the Account Management process.

Upon receipt of each DUF, the Pseudo-CLEC performed the following standard types of validations on the file:

1. File edits
2. Header edits
3. Trailer edits
4. Duplicate Check edits
5. Detail edits
6. Timeliness edits

In August 2001, Qwest upgraded their DUF process to EMI Version 18, dated July 2001. With Qwest's implementation of EMI Version 18, ADUF (access) records, along with ODUF records were received by the Pseudo-CLEC. Documentation of the DUF process is provided at the Qwest website (http://www.qwest.com/wholesale/clecs/duf.html).

Under EMI Version 18, the Pseudo-CLEC performed basic validation of pack header and trailer records according to EMI standards for both the

ADUF and ODUF records before converting to a spreadsheet for CGE&Y analysis. These spreadsheets for the initial test and the retest are contained in the CGE&Y document, Combined Call Logs and DUF File.xls. [3]

Evaluation Process

CGE&Y's evaluation of the DUF records for the initial test included DUFs received from January 25, 2002 through February 16, 2002. This evaluation analyzed only planned test calls and did not include any casual calls that the caller may have made. During the retest, the DUFs reviewed were received from March 13, 2002 through April 5, 2002 and the evaluation analyzed all originating and terminating calls for the test accounts as logged by the test caller.

During the audit of DUF records, CGE&Y also:

1. Verified the accuracy of call types in the Record ID field.
2. Verified the date and time of the beginning and the end of the calls.
3. Verified the jurisdiction (Settlement Code and LATA Indicator) where applicable.
4. Verified the applicable carrier identification code (CIC) on access records.
5. Verified the Indicator 4 field value was populated correctly according to the account type (Resale or UNE-P).
6. Verified the direction of the call in the Originating / Terminating field.
7. Verified that no access usage is reported for Resale accounts.
8. Verified that the execution of usage sensitive class services generated DUF records.
9. Verified that the correct Operating Company Name (OCN) is populated on access records and is in the correct field on UNE-P accounts.
10. Identified missing DUF records.
11. Verified that all DUF records in the retest call period were generated by the test accounts.
12. Verified that DUF files had unique invoice sequence numbers.

Results

Test results showing DUF records received by call type for the initial test and the retests are shown in Table 2.4.5a below. Confidential call logs and the associated DUFs, LSRs and CSRs are available separately. [4]

[3] CGE&Y Archive CDs: Supplemental DUF Evaluation, Supplemental DUF Evaluation Update, Supplemental DUF Evaluation Retest.
[4] CGE&Y Archive CDs: Supplemental DUF Evaluation, Supplemental DUF Evaluation Update, Supplemental DUF Evaluation Retest.

Table 2.4.5a - DUF Records Received by Call Type

Test Call Type	Initial Test ODUF Expect	Initial Test ODUF Found	Initial Test ADUF Expect	Initial Test ADUF Found		Retest 1 ODUF Expect	Retest 1 ODUF Found	Retest 1 ADUF Expect	Retest 1 ADUF Found		Retest 2 ODUF Expect	Retest 2 ODUF Found	Retest 2 ADUF Expect	Retest 2 ADUF Found	
In-State Interlata Long Distance Call Completion	0	0	33	18	55%	0	0	42	42	100%	0	0	0	0	0
In-State Intralata Long Distance Call Completion	84	77	45	14	71%	45	45	28	28	100%	0	0	0	0	0
Terminating Interlata Call	0	0	23	4	17%	0	0	73	73	100%	0	0	0	0	0
Terminating Intralata Call * Note 3	0	0	32	0	0%	0	0	52	17	33%	0	0	15	11	73%
Local Directory Assistance 1-411	87	86	0	0	99%	54	54	0	0	100%	0	0	0	0	0
Toll Directory Assistance	0	0	32	17	53%	0	0	30	30	100%	0	0	0	0	0
800 WATS Number	0	0	51	38	75%	0	0	31	31	100%	0	0	0	0	0
900 Blocking	0	0	16	3	19%	0	0	31	31	100%	0	0	0	0	0
Verify Long Distance Carrier	0	0	47	20	43%	0	0	27	27	100%	0	0	0	0	0
Verify IntraLata Long Distance Carrier	0	0	0	0	0%	0	0	0	0	0%	0	0	0	0	0
Directory Assistance Connection (Call completion)	0	0	43	28	65%	6	6	5	5	100%	0	0	0	0	0
Usage Sensitive Call/Last Call Return * Note 1	0	0	0	0	0%	50	50	0	0	100%	0	0	0	0	0
Usage Sensitive Call/Last Continuous Redial * Note 1	0	0	0	0	0%	50	50	0	0	100%	0	0	0	0	0
Toll Credit Request * Note 2	0	0	0	0	0%	11	11	0	0	100%	0	0	0	0	0
Local Call * Note 2 & 3	0	0	0	0	0%	72	0	0	0	0%	19	19	0	0	100%
Total	171	163	322	142	62%	288	216	319	284	82%	19	19	15	11	88%

	Initial Test	Retest 1	Retest 2
ODUF Success	95%	75%	100%
ADUF Success	44%	89%	73%

* Note 1 – Retest 1 only. For Initial Test, accounts had monthly subscription.
* Note 2 – Retest 1 only. Not performed on Initial Test.
* Note 3 - Retest 2 - Two test call types only.

Test results for the initial test for each test account are shown in Table 2.4.5b and Table 2.4.5c below.

Table 2.4.5b - Initial Test Results by Test Account

Test Number	Converted To	LSR Issued Date	30/C Date	LEC Report Date	Test Calls		Dates of DUF Files When Usage First & Last Received *Note 1				Record Date of First Usage Received on DUF Files	
					Begin	End	First ODUF	Last ODUF	First ADUF	Last ADUF	Expected	Actual
TN 01	Resale	1/22/02	1/24/02	1/25/02	1/22/02	1/30/02	1/30/02	2/1/02	N/A	N/A	1/25/02	1/25/02
TN 02	Resale	1/22/02	1/25/02	1/26/02	1/22/02	1/30/02	2/5/02	2/5/02	N/A	N/A	1/26/02	1/28/02
TN 03	Resale	1/22/02	1/25/02	1/26/02	1/22/02	1/30/02	2/5/02	2/5/02	N/A	N/A	1/26/02	1/26/02
TN 04	Resale	1/22/02	1/25/02	1/26/02	1/22/02	1/31/02	2/5/02	2/5/02	N/A	N/A	1/26/02	1/27/02
TN 05	Resale	1/22/02	1/25/02	1/26/02	1/28/02	1/30/02	2/5/02	2/5/02	N/A	N/A	1/26/02	1/28/02
TN 06	Resale	1/22/02	1/25/02	1/26/02	1/22/02	1/29/02	2/5/02	2/5/02	N/A	N/A	1/26/02	1/27/02
TN 07	Resale	1/22/02	1/25/02	1/26/02	1/22/02	1/31/02	2/5/02	2/5/02	N/A	N/A	1/26/02	1/28/02
TN 08	UNE	1/22/02	1/25/02	1/26/02	1/23/02	1/30/02	2/7/02	2/11/02	2/8/02	2/11/02	1/26/02	1/26/02
TN 09	UNE	1/22/02	1/25/02	1/26/02	1/23/02	1/29/02	2/6/02	2/6/02	2/6/02	2/6/02	1/26/02	1/28/02
TN 10	UNE	1/22/02	1/25/02	1/26/02	1/29/02	1/31/02	2/7/02	2/11/02	2/8/02	2/11/02	1/26/02	1/28/02
TN 11	UNE	1/22/02	1/25/02	1/26/02	1/22/02	1/31/02	2/7/02	2/11/02	2/8/02	2/11/02	1/26/02	1/27/02
TN 12	UNE	1/22/02	1/25/02	1/26/02	1/23/02	1/30/02	2/7/02	2/11/02	2/8/02	2/11/02	1/26/02	1/28/02
TN 13	UNE	1/22/02	1/25/02	1/26/02	1/23/02	1/31/02	2/6/02	2/6/02	2/6/02	2/6/02	1/26/02	1/28/02
TN 14	UNE	1/22/02	1/25/02	1/26/02	1/25/02	1/30/02	2/7/02	2/11/02	2/8/02	2/11/02	1/26/02	1/28/02
TN 15	UNE	1/22/02	1/25/02	1/26/02	1/23/02	1/30/02	2/12/02	2/14/02	2/13/02	2/14/02	1/26/02	1/27/02

*Note 1 - Per Data Request 264 response, first usage files delayed 4 days due to monthly bill pull and 3 days due to standard CRIS pending order hold period.

Table 2.4.5c - Initial Test Results by Test Account

Test Number	Converted To	Test Call Analysis						% of Success
		Calls Made	No DUF Expected	ODUF Expected	ODUF Found	ADUF Expected	ADUF Found	
TN 01	Resale	134	104	30	30	0	0	100%
TN 02	Resale	80	69	11	11	0	0	100%
TN 03	Resale	57	53	4	4	0	0	100%
TN 04	Resale	127	116	11	11	0	0	100%
TN 05	Resale	56	47	9	9	0	0	100%
TN 06	Resale	73	65	8	8	0	0	100%
TN 07	Resale	108	97	11	11	0	0	100%
TN 08	UNE	48	21	6	6	24	14	67%
TN 09	UNE	106	71	8	8	31	8	41%
TN 10	UNE	49	10	8	8	35	0	19%
TN 11	UNE	87	47	9	9	35	15	55%
TN 12	UNE	63	21	12	10	37	9	39%
TN 13	UNE	97	36	13	13	54	14	40%
TN 14	UNE	63	23	10	5	35	12	38%
TN 15	UNE	149	68	21	20	71	70	98%
Totals:		1287	848	171	163	322	242	82%

ODUF Success	95%
ADUF Success	44%

Resale Success	100%
UNE Success	84%

Initial Test Findings:

- CGE&Y opened AZIWO2127 because 92 ADUF records were not received as identified in Qwest's response to Data Request 264.[4] The system fix for this IWO was retested.
- CGE&Y opened AZIWO2128 because 41 WATS DUF records were not received as identified in Qwest's response to Data Request 264.[4] The system fix for this IWO was retested.
- CGE&Y expected to receive 171 ODUF records and 322 ADUF records from the test calls. The overall success rate for DUF records received was 62%; 95% for ODUF records and 44% for ADUF records during this test period. CGE&Y opened AZIWO2129 because the volume of expected DUF records received was lower than anticipated. This IWO was re-evaluated in the retest.
- No DUF records were found for calls placed on or prior to the SOC when the account was still retail, as expected.
- All DUF files had unique invoice sequence numbers, as expected.
- Qwest immediately applied a system fix when the issue with an order posting to CRIS on a Friday concurrent with held access usage was identified (AZIWO2127).
- Qwest immediately applied a system fix when the issue with dropped WATS records was identified (AZIWO2128).
- For one test account, 120 usage records were delayed 22 days after the conversion date due to post order completion error correction.
- Inaccurate Indicator 4 – For 24 records the Indicator 4 value was 6 and should have been 7. CGE&Y opened AZIWO1215 for this error. Per Qwest's response, this error was associated with the issue that caused AZIWO2127. AZIWO1215 was retested.
- All DUF records had accurate start and end times compared to the test call logs.
- During the initial test it was found that 73% of the DUF records received had the correct Indicator 4 value.

[4] CGE&Y Archive CD: Supplemental DUF Evaluation.

Test results for Retest 1 for each test account are shown in Table 2.4.5d and Table 2.4.5e below.

Table 2.4.5d - Retest 1 Results by Test Account

Test Number *Note 1	Converted To	LSR Issued Date	SOC Date	LSC Report Date	Post To Be Billed Date	Test Calls		Dates of DUF Files When Usage First & Last Received				Detail Usage First Received on DUF Files	
						Begin	End	First ODUF	Last ODUF	First ADUF	Last ADUF	Expected	Actual
TN 06	Resale	3/8/02	3/13/02	3/14/02	3/14/02	3/13/02	3/17/02	3/20/02	3/20/02	N/A	N/A	3/14/02	3/14/02
TN 10	Resale	3/8/02	3/13/02	3/14/02	3/14/02	3/13/02	3/17/02	3/20/02	3/20/02	N/A	N/A	3/14/02	3/14/02
TN 05	Resale	3/8/02	3/13/02	3/14/02	3/15/02	3/13/02	3/17/02	3/21/02	3/21/02	N/A	N/A	3/14/02	3/14/02
TN 08	Resale	3/8/02	3/13/02	3/14/02	3/14/02	3/13/02	3/17/02	3/20/02	3/20/02	N/A	N/A	3/14/02	3/14/02
TN 13	Resale	3/8/02	3/13/02	3/14/02	3/14/02	3/13/02	3/17/02	3/20/02	3/20/02	N/A	N/A	3/14/02	3/14/02
TN 03	UNE	3/8/02	3/13/02	3/14/02	3/15/02	3/13/02	3/17/02	3/21/02	3/21/02	3/21/02	3/21/02	3/14/02	3/14/02
TN 04	UNE	3/8/02	3/13/02	3/14/02	3/15/02	3/13/02	3/17/02	3/21/02	3/21/02	3/21/02	3/21/02	3/14/02	3/14/02
TN 09	UNE	3/8/02	3/13/02	3/14/02	3/15/02	3/13/02	3/17/02	3/21/02	3/21/02	3/26/02	3/26/02	3/14/02	3/14/02
TN 11	UNE	3/8/02	3/13/02	3/14/02	3/15/02	3/13/02	3/17/02	3/21/02	3/21/02	3/26/02	3/26/02	3/14/02	3/14/02
TN 12	UNE	3/8/02	3/13/02	3/14/02	3/15/02	3/13/02	3/17/02	3/21/02	3/21/02	3/21/02	3/21/02	3/14/02	3/14/02
TN 16	UNE	3/8/02	3/13/02	3/14/02	3/15/02	3/13/02	3/17/02	3/21/02	3/21/02	3/21/02	3/21/02	3/14/02	3/14/02
TN 07	UNE	3/8/02	3/13/02	3/14/02	3/18/02	3/13/02	3/17/02	3/22/02	3/22/02	3/22/02	3/22/02	3/14/02	3/14/02

*Note 1 - Test Number reference maintained from Initial Test.

Table 2.4.5e - Retest 1 Results by Test Account

Test Number *Note 1	Converted To	Test Call Analysis						% of Success
		Calls Made	No DUF Expected	ODUF Expected	ODUF Found	ADUF Expected	ADUF Found	
TN 06	Resale	25	11	14	14	0	0	100%
TN 10	Resale	20	2	18	18	0	0	100%
TN 05	Resale	19	2	17	17	0	0	100%
TN 08	Resale	20	3	17	17	0	0	100%
TN 13	Resale	19	2	17	17	0	0	100%
TN 03	UNE	71	5	25	17	45	40	81%
TN 04	UNE	79	4	28	19	51	46	82%
TN 09	UNE	51	1	29	20	26	24	80%
TN 11	UNE	78	4	25	17	53	48	83%
TN 12	UNE	73	4	29	20	45	38	78%
TN 16	UNE	100	8	44	23	54	49	73%
TN 07	UNE	71	5	25	17	45	39	80%
Totals:		628	51	288	216	349	284	82%

ODUF Success	75%
ADUF Success	89%

Resale Success	100%
UNE Success	80%

*Note 1 - Test Number reference maintained from Initial Test.

Test results for Retest 2 for each test account are shown in Table 2.4.5f below. For Retest 2, only test calls were made. No account migrations were required.

Table 2.4.5f - Retest 2 Results by Test Account

Test Number	Converted To	Test Calls		Dates of DUF Files When Usage First & Last Received				Detail Usage First Received on DUF Files	
		Begin	End	First ODUF	Last ODUF	First ADUF	Last ADUF	Expected	Actual
TN 03	UNE	4/2/02	4/2/02	4/3/02	4/4/02	4/3/02	4/3/02	4/3/02	4/3/02
TN 04	UNE	4/2/02	4/2/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02
TN 09	UNE	4/2/02	4/2/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02
TN 11	UNE	4/2/02	4/2/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02
TN 12	UNE	4/2/02	4/2/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02
TN 16	UNE	4/2/02	4/2/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02
TN 07	UNE	4/2/02	4/2/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02	4/3/02

*Note 1 - Test Number reference maintained from Initial Test.

		Test Call Analysis						
		Calls Made	Non DUF Expected	ODUF Expected	ODUF Found	ADUF Expected	ADUF Found	% of Success
TN 03	UNE	8	0	5	5	3	3	100%
TN 04	UNE	4	0	2	2	2	2	100%
TN 09	UNE	6	0	4	4	2	1	83%
TN 11	UNE	4	0	2	2	2	1	75%
TN 12	UNE	4	0	2	2	2	1	75%
TN 16	UNE	4	0	2	2	2	2	100%
TN 07	UNE	4	0	2	2	2	1	75%
	Totals:	30	0	17	17	13	10	90%

ODUF Success	100%
ADUF Success	77%

Resale Success	N/A
UNE Success	90%

Retest Findings:

- CGE&Y retested AZIWO2127 and did not receive 35 ADUF records for calls terminating to a UNE-P account from an IntraLATA Qwest payphone. Because these same records were identified in AZIWO2129 this issue was included in the results for AZIWO2129, and AZIWO2127 was closed.
- CGE&Y retested AZIWO2128 for WATS DUF records not received. All 31 WATS call records expected were received. AZIWO2128 was closed.
- CGE&Y retested AZIWO2129 because a lower than expected volume of DUF records were received. The overall success rate for DUF records received was 82%; 75% for ODUF records and 89% for ADUF records during the retest. In confidential DRs 276

and 277 Qwest reported system fixes to address the DUF records that were not received. CGE&Y's evaluation of Qwest system fixes during Retest 2 consisted of issuing test calls on UNE-P lines. CGE&Y received all ODUF records as expected and all ADUF records for which Qwest had received an access record.

- No DUF records were received for calls placed on or prior to the SOC when the account was still retail, as expected.
- All DUF files had unique invoice sequence numbers, as expected.
- CGE&Y retested AZIWO1215 because an inaccurate Indicator 4 value was received. All 37 ODUF records for two UNE-P test accounts were received six days after posting to billing with an incorrect value of 6 (Resale). ADUF records were received for these same two accounts five days after the ODUF records with a correct Indicator 4 value of 7 (UNE-P). CGE&Y evaluation of the March 22, 2002 process change during Retest 2 consisted of reviewing Qwest production data for 1127 DUF records associated with 17 unique telephone numbers installed as Resale and UNE-P on 4-1-02 and 4-2-02. All DUF records reflected the correct Indicator 4 value showing that the process change implemented worked as expected.
- All DUF records received for the test accounts during the test period were validated as generated by the test account.
- DUF records had accurate start and end times compared to the call logs.
- During Retest 1 it was found that 93% of the DUF records received had the correct Indicator 4 value. In the evaluation of Retest 2 records 100% of the DUF records had the correct Indicator 4 value.

Exit Criteria

Per Section 3.8.4 of the TSD, prior to exiting the Billing Functionality Test, the following criteria were met:

Criterion	Completed
The capture and documentation of billing information provided on the wholesale bills to the Pseudo-CLEC by the TA	✓
The evaluation of the paper and electronic copies of the monthly bills for a minimum two-month time period and the electronic copies of the daily usage file on a weekly basis by the TA	✓
The TA's documentation and analysis of the information provided by the Pseudo-CLEC and /or CLEC's billing data	✓
Closure of all outstanding issues logged in the TA Master Issues Log (see Appendix J for the Master Issues Log Process)	✓
Closure of all issues deemed by the TAG to require Qwest system corrections as documented on Incident Work Orders and processed in accordance with the Testing Incidents Process (Appendix I [TSD])	✓
The results of the bill validation are documented in the final report to the ACC	✓

Conclusions

CGE&Y concludes the following concerning the Qwest OSS, specifically related to the test of the billing system. The billing system always generated a bill for all billable items that were included on the Qwest CSR. The order process between provisioning and billing works as expected. Order items that appeared to be provisioned to the account and customer billable were always on the invoice. There were no major issues related to the Qwest billing system for the Pseudo-CLEC.

CGE&Y observed that when billing issues were referred to Qwest the problem was corrected by system updates and adjustments given as illustrated by AZIWO1158. CGE&Y also notes that system enhancements were made to the Qwest billing system as a result of the Functionality Test as illustrated by AZIWO1154. Qwest was able to

identify other improvements that were incorporated into their internal processes.

CGE&Y concludes the following regarding the generation of DUF records. Usage records were generated to the new co-provider beginning with usage occurring the day after the conversion date, as expected. The accuracy of the Indicator 4 value improved from 73% in the initial test to 93% in Retest 1 and to 100% in Retest 2. Qwest implemented system fixes to resolve processing errors that prevented switched access call records from being reported on the ADUFs. After Retest 2, CGE&Y received 100% of ADUF records for which Qwest had received an access record from the Inter-Exchange carrier and 100% of expected ODUF records.

TAB 4

Question:

In Minnesota, CLECs questioned whether the installation quality measurements actually capture all measures of quality. CLECs question whether the PID will show no trouble found in provisioning service when Qwest provisioned some, but not all, of the service correctly. For example, if a CLEC orders 5 lines and 4 were provisioned correctly, will the PID show 100% satisfaction?

Answer:

Summary

The OP-5 PID, "New Service Installation Quality," captures installation quality consistent with the defined methodology. However, this methodology has known limitations that overstate errors and understate service quality. Reported results reflect this downward bias. Based on recent inquiries, Qwest has examined a new issue: treatment of trouble related to LSR/SO mismatches, which is not currently captured in OP-5. Data indicates that this situation is rare and does not distort OP-5 results, particularly when set against other elements which bias those results downward. Qwest will track the number of LSR/SO mismatches going forward pending a determination in the Long Term PID Administration forum as to whether the OP-5 PID should be modified or a new PID should be created. However, such future PID refinements are not inconsistent with a conclusion that current OP-5 measurements are probative of Qwest's installation quality performance.

Background and Context

OP-5, "New Service Installation Quality," was developed through extensive discussion during the ROC and Arizona workshops. The measurement was also addressed during TAG meetings and the Liberty Consulting Audit. The parties specifically discussed concepts about ordering and installation quality, reaching consensus on an OP-5 definition that captures all such situations that generate trouble reports (received within 30 calendar days following installation of inward lines), whether triggered by ordering issues or by installation errors. Liberty Consulting later reviewed Qwest's implementation of OP-5 and ultimately found it to generate accurate and reliable results.[18]

Although OP-5 successfully measures key installation quality parameters, the agreed upon definitions have inherent limitations that are well known. These limitations bias OP-5 to overstate errors and understate actual service quality. Liberty Consulting described these limitations in its Performance Measurements Audit Report ("PMA Report"), as follows:

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18 *Liberty Consulting's Final PMA Report* p. 66, ¶ 4(d) (Sept. 25, 2001) (hereinafter "PMA Report").

1. **"The number of trouble reports used in this measure is reported on a per-line basis, while the number of orders used in the measure is reported on a per-order basis."**[19]

   Explanation: The denominator of OP-5 consists of the average number of orders for inward line activity installed in the current and previous month[20] – each of such orders can involve multiple lines – whereas trouble reports counted in the numerator of OP-5 are counted on the basis of trouble tickets that are submitted on a per-line or service basis. As a result, the OP-5 performance can be consistently understated when compared to the numerator for this measure.

2. **"[A] single installation order could involve multiple lines or circuits, and troubles could be experienced on separate lines or circuits within the first 30 days."**[21]

   Explanation: A multiplying effect is created on top of the first point above whenever there are multiple lines or circuits per order. This increases the exposure of OP-5 results to multiples of volumes of trouble tickets, which are counted on a per-line or per-service basis, while the installation activity is counted on a per-order basis.[22] To the extent these effects exist, the result is to bias the OP-5 result downward. As a result, the OP-5 performance can be consistently understated when compared to the numerator for this measure.

3. **"A single-line installation could have multiple troubles within the first 30 days, and thus bias the OP-5 result downward."**[23]

   Explanation: There can be multiple trouble reports for an individual line or service in the 30 days following any installation activity. To the extent this happens, given that the measurement is to reflect the percentage of orders

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19 *Id.* at p. 63, 3rd sub-paragraph, 2nd sentence.

20 Per the OP-5 definition in PIDs (e.g., ROC 271 Working PID Version 5.0).

21 *PMA Report* at p. 63, 3rd sub-paragraph, last sentence.

22 This effect is further multiplied with DS1-level services and above (e.g., DS3), where each DS1 "line" has 24 circuits, each one of which is exposed to the possibility of separate trouble tickets.

23 *PMA Report* at p. 63, 3rd sub-paragraph, 4th sentence.

without trouble tickets,[24] the result is, using Liberty's expression, "to bias the OP-5 result downward."[25]

4. **"The number of new installations used in both the numerator and denominator of the formula for OP-5 is the average of the current and prior months' inward orders including change orders for additional lines. The number of trouble reports used in the numerator is the total of all trouble reports closed during the reporting period and that were received within 30 days of the date of original installation."**[26]

5. Explanation: That the provisioning aspect of the measurement is limited to inward line activity (and constitutes an arithmetic average of two months' installation activity), while the repair aspect of the measurement includes all trouble tickets within 30 days of an installation (from only the current month), means that trouble tickets counted in the numerator and the orders counted in both the denominator and the numerator are not linked. Accordingly, the approved OP-5 PID does not call for such linkage. As a result, while the denominator of order volumes is limited to inward line activity, the trouble tickets counted in the numerator are not so limited.[27] This situation, again, biases the OP-5 result downward.

As noted, all of these items bias OP-5 results downward, which constitutes an *understating* of Qwest's OP-5 new service installation quality. In their comments on Liberty's PMA Report, neither AT&T, WorldCom or Covad said anything about these four points.

Ordering Accuracy

With respect to the question of ordering accuracy, when a CLEC experiences a problem with a service or feature related to an LSR with inward line activity within 30 days of installation, it may report the problem to Qwest via one of two call centers (Repair Call Handling Centers (RCHCs) or Interconnect Service Center (ISC)), by facsimile, or via one of two electronic interfaces (CEMR or EB-TA). If the problem is reported through one of Qwest's repair portals (RCHC,

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24 *Id.* at p. 63, ¶2, 1st sentence.

25 While this phenomenon is captured by the MR-7 Repeat Trouble Rate measurement, the ROC collaborative did not agree to exclude it from the OP-5 measurement.

26 *PMA Report* at p. 63, 2nd sub-paragraph, 2nd & 3rd sentences.

27 Trouble tickets have coding that indicates whether they have occurred within 30 days of service installation, but no indication as to whether the installation activity was for inward lines or not. As a result, trouble tickets for feature-only orders, PIC changes, etc., are included in the numerator, while the corresponding orders are, per the PID, excluded.

CEMR, EB-TA, or fax), the repair process calls for attempting to determine if the customer record indicates that the customer has ordered the line or feature that is in "trouble." If the line or feature is on the customer record, the report is processed through Qwest's repair processes and, if the trouble is subsequently found to be in the Qwest network, the trouble is repaired. The trouble ticket thus generated counts in the OP-5 PID results.

However, in the infrequent event that a line or feature reported with a problem is not indicated on the customer record (i.e., either the customer has not ordered it or there was a LSR/Service Order mismatch), then the report is passed, via warm transfer, to the Interconnect Service Center (ISC). If the ISC then determines there was a LSR/Service Order mismatch, it issues a Service Order to correct the problem, but no trouble ticket is generated. Thus, the OP-5 measurement does not capture it.

Qwest has conducted an analysis of the frequency of the situation identified above. On June 27, 2002, Qwest initiated a process to track LSR/SO mismatches in a tracking database used by ISC representatives. This database provides the number of LSR/SO mismatch occurrences on a daily basis in an aggregated format. In order to develop a LSR/SO mismatch rate, Qwest obtained the total daily order volume associated with inward line activity. This number is representative of the OP-5 PID denominator – volumes of orders.

In order to obtain a sense of the magnitude of the issue, Qwest analyzed all orders from June 28 through July 3 to determine the volume of the LSR/Order mismatch situations as a percentage of all orders qualified for measurement by OP-5. The preliminary result was 0.63% overall and ranged by day between 0.24% and 1.05%. (This represents 68 LSR/SO mismatches in a universe of 12,171 completed LSRs.) If these were included in OP-5 as though trouble tickets had been submitted, their impact on OP-5 results would be insignificant particularly in comparison to the opposite effects from the *understating* of new service quality caused by the above-described OP-5 limitations.

Reporting of Ordering Accuracy

Going forward, to assure all involved that this issue is *de minimus*, Qwest will report, alongside its OP-5 results, the number of LSR/Order mismatch situations, corresponding to the percentages reported above. This will occur on a monthly basis until such time as the Long Term PID Administration forum determines whether a PID should be used to monitor this issue. In addition, Qwest has developed PO-20, in order to address dimensions of service order quality that may affect intervals and commitments met actually delivered to CLECs or the accuracy of measuring such intervals and commitments met.

TAB 5

Question:

Why does the purported 15% error rate identified by KPMG not impact due dates. Specifically, show the impact of human error on due dates by product. Moreover, show the impact of erroneously rejected LSRs by product.

Answer:

As an initial matter, KPMG did not conclude that Qwest has a 15% error rate whenever manual processing is involved. AT&T's calculation of this percentage is based on a very small number of orders (49-76 orders, depending on the source) analyzed by KPMG. Other data sources with greater sample sizes provide a different picture of the manual processing error rate.

Liberty Audit

Qwest participated in a data reconciliation effort where approximately 10,000 orders and trouble tickets were analyzed. The entire purpose of the data reconciliation effort was to analyze input data; in other words, information input on a manual basis by human beings. During that eight-month effort, which considered hundreds of thousands of pages of material, Liberty issued seven Observations that concerned human error. Specifically:

- Observation 1031: Affected 0.5% of interconnection trunk orders.
- Observation 1032: Affected less than 4% of unbundled loop orders and made Qwest's performance look worse than it was in reality.
- Observation 1033: Affected less than 2% of interconnection trunk and unbundled loop orders and tended to get CLECs the ordered product sooner.
- Observation 1028: Affected 6.5% of unbundled loop trouble reports, which sometimes hurt and sometimes helped Qwest's performance data.
- Observation 1034: This human error was rectified in mid-2001 and Liberty verified it is no longer contained in the performance data.
- Observation 1036: Affected less than 0.3% of interconnection trunk orders and is no longer contained in the performance data.

- Observation 1037: This human error was rectified in mid-2001 and Liberty verified it is no longer contained in the performance data.

Liberty's aggregate results demonstrate that 6% of historic unbundled loop orders contain human error, which errors tend to help CLECs. This data shows that 2.8% of historic interconnection trunk orders contain human error. Thus, AT&T's claims that 15% of manually processed orders contain human error thereby causing CLECs substantial harm is not supported by the Liberty Data Reconciliation.

Of the seven categories of errors identified by Liberty, only one could even arguably affect the date on which the CLEC obtains the requested product. That issue, found in Observation 1033, concerned incorrect identification of the "Application Date." The Application Date is the business day on which Qwest agrees it received the order. For unbundled loops, and non-designed products such as Resale POTS and UNE-P POTS, Qwest business rules state that the Application Date is the next business day for orders received after 7:00 p.m. For interconnection trunks, and designed products such as Resale private line and UDIT, Qwest business rules state that the Application Date is the next business day for orders received after 3:00 pm. Both Liberty (with respect to design products) and KPMG (with respect to non-design products)[28] found that there was some percentage of human error associated with identifying the correct Application Date.

To the extent that manual errors are made on the Application Date, they can affect the ultimate Due Date. However, they will not always affect the due date. If the CLEC schedules an appointment for outside dispatch or requests an extended interval, the due date is not affected by the Application Date. Additionally, KPMG found occurrences where the Application Date was entered incorrectly by Qwest but the Due Date was determined accurately. The system edits reduce the likelihood that manual processing errors will result in longer-than-appropriate intervals being applied. KPMG found for non-design orders, and Liberty found for unbundled loops, that Qwest occasionally starts the clock earlier than a strict reading of its business processes allow. This error has not tended to lengthen actual provisioning intervals. Qwest has been unable to find even one order involved in the Liberty Data Reconciliation for unbundled loops where the clock started later than it should have.

Interconnection trunks were the one product where evidence from the Data Reconciliation shows that Qwest occasionally started the clock too late. Liberty found a few occasions (less than 1%) of the hundreds of interconnection trunk orders analyzed where Qwest started the clock late thereby lengthening the

28 *See Exception 3120.*

interval for the CLEC. Qwest retrained its affected employees to make sure this problem did not recur.

Internal Audit of Application Date Accuracy

Qwest implemented an internal audit process to check a percentage of the orders to verify that the Application date is correctly entered. Qwest began this audit in late January 2002. Initially the universe of orders for the audit included both flow-through and manually-processed orders. The universe of orders was modified for the audits completed in March and April to include only manually processed service orders. The results of those audits are shown in the following table.

PRODUCT	Mar-02		Apr-02	
	# Orders Sampled	APP Accuracy	# Orders Sampled	APP Accuracy
Resale POTS	226	96.0%	195	99.0%
UNE-P POTS	146	97.3%	138	98.6%
Combined: Resale POTS/UNE-P POTS	372	96.5%	333	98.8%
Unbundled Loops	383	98.2%	365	99.5%

As can be seen, the accuracy of the application dates shows an upward trend and is high for both months analyzed.

Reject in Error

The second portion of the question concerns erroneously rejected LSRs, and the affect this would have on intervals. Last week, Qwest provided a chart reflecting the total number of LSRs rejected in error, as determined by an FOC being issued after the reject. The Department asked that Qwest resubmit this data for the LSRs processed manually. Qwest has modified that chart to compare the manual rejects in error against a denominator of manually handed LSRs.

Percentage of Manually Processed LSRs Rejected in Error[29]

MONTH	# LSRs - FOC After Ordering Rejected	Total Manual LSRs Received	% of Manual LSRs FOC'd After Reject
Apr-01	774	71,715	1.08%
May-01	912	68,963	1.32%
Jun-01	926	58,683	1.58%
Jul-01	937	61,165	1.53%
Aug-01	1134	67,901	1.67%
Sep-01	852	58,694	1.45%

29 The May volume of manually-processed LSRs is still being calculated.

Oct-01	942	68,731	1.37%
Nov-01	766	62,328	1.23%
Dec-01	792	60,140	1.32%
Jan-02	726	69,146	1.05%
Feb-02	388	52,882	0.73%
Mar-02	368	52,236	0.70%
Apr-02	419	60,852	0.69%
May-02	417	70,551	0.59%

When compared to only manually handled LSRs, the percentage of rejects in error remains below 1%.

Third Party Test Support for Manual Order Accuracy

Qwest has heard claims that manual processing errors cause improperly-installed services, meaning that certain features requested on the LSRs are not provisioned because of SDC mistakes. KPMG specifically tested this in the Third Party Test through evaluation criterion 14-1-12, which evaluated LSRs submitted and compared the fields in those LSRs to the fields in the resulting CSR in Qwest's systems, and found this criterion "satisfied."[30] Similarly, KPMG evaluated whether Qwest switch translations contain required field inputs (14-1-3), and whether switch translations with disconnect orders are executed with the proper intercept-recording message (14-1-4) and are completed on the committed due date (14-1-5).[31] KPMG found that Qwest "satisfied" those criteria as well.[32] More generally, in Test 12.8, which focused exclusively on manual order processes, Qwest satisfied nine of the ten evaluation criteria. [33]

30 *See Final Report* at 186-187.

31 *See id.* at 182-183.

32 *See id.*

33 The remaining criteria (12.8-2) was deemed "unable to determine" as a result of Observation 3110. *See id.* at 145-46.

TAB 6

Question:

Why are FOCs sometimes followed by a jeopardy notification?

Answer:

There are a variety of reasons why Qwest can properly submit jeopardy after issuance of an FOC.

- Provisioning Jeopardy: If after the FOC has been issued Qwest determines that it cannot meet the due date because of either Qwest or customer-caused delays, a jeopardy notice is sent to the CLEC.

- Duplicate Requests: The CLEC submits a second LSR requesting the same work. When the requests are submitted very closely to one another, the first LSR has not processed completely. When this occurs, there are no pending service orders in the SOP that would allow the system edit or the service center to determine that this was a duplicate request before processing the second LSR.

- Inconsistent End User (EU) data: The CLEC submits an LSR with old EU data (end user name, address); however, a recent change has occurred (such as a move), and the CLEC submits the LSR during the normal posting period for the previous order.[34] In this circumstance, when the CLEC uses the old data, the old customer record (CSR) is still considered "live" (because the order has not posted yet), flow-through finds a match, and Qwest issues the service order(s) and FOC. The order then falls out during provisioning because the request does not have the correct address.

- Facility related: The CLEC has assigned the same "slot" (collocation tie down and/or EEL transport) on two different requests. The CLEC (and Qwest system/center) validate the slot as good on the second request because the service order (from the first LSR) has not progressed to TIRKS yet. The second LSR is processed and falls out in provisioning because the first LSR's service order has now progressed through provisioning and the slot is "pending in" and can't be used on the second request.

- Not a Working Account: This is very similar to inconsistent EU data. On a conversion, the end user customer has placed a disconnect on the line/account. Close to the disconnect due date, the CLEC submits a conversion; however, the disconnect order has not posted yet, and so the CSR still shows the

34 KPMG found that Qwest satisfied test criterion 14-1-13, which related to timely updating of CSRs.

account as live. The CLEC and flow through/center process the conversion which falls out of provisioning because the line/account to be converted has been disconnected already by the end user.

- Error in LSR Processing: The CLEC LSR is not complete and accurate. The Qwest center overlooks the error prior to creating service orders and issuing the FOC. The error is then detected in provisioning. For example, the CLEC has omitted supplemental address information that is required.

Information is not available by product. PO-8 and PO-9 results are reported by broad product categories (resale, UNE-P, loops and LIS) but are not available disaggregated by the jeopardy categories noted above.

TAB 7

Question:

What does Qwest do to limit the percentage of human errors on orders?

Answer:

As an initial matter, the small number of human errors identified are within a reasonable tolerance level. The data from the Liberty Consulting Data Reconciliation make this plain. Nevertheless, Qwest has taken, and continues to take, quality assurance measures directed at reducing the number of human errors in order processing.

- Up-front IMA Edits: The first line of defense is the IMA edits. These edits prevent LSRs that contain errors from reaching Qwest. The more known errors that can be caught by the system, the less opportunity for manual error to occur. Qwest implements additional edits in every release of IMA, attempting to focus on those errors that are most prevalent on CLEC LSRs.

- Improved Flow-Through: With each improvement in Qwest's flow-through results, the opportunity for human error diminishes. Qwest has made significant improvements in our flow-through rates, more than doubling our resale rate from March 2001 to March 2002 (as measured in PO-2A) and nearly doubling our flow-through rate for the other products for that same timeframe. CLECs have an opportunity to work with Qwest to improve such flow-through rates through prioritization in the Change Management Process.

- SDC Training Curriculum: A training curriculum exists for each Qwest Service Delivery Coordinator (SDC) based on the product set that he/she will support. Each SDC completes the appropriate training and also "nests" with an experienced SDC following the training. This "nesting" period provides support to an individual until they are able to work independently. During the data reconciliation and OSS Test, both Liberty and KPMG evaluated much of this training material and found it sufficient.

- Interconnect Service Center Individual Quality Reviews: Center managers review service orders created by each SDC on their team on a weekly basis. Individual feedback is provided immediately. This review allows areas of misunderstanding or confusion to be addressed quickly and to not be masked in data that has been summarized. Additional training is provided if it is determined to be the reason for the performance gaps.

- Interconnect Service Center Trend Analysis: This work is a counterpart to the individual quality reviews. If center managers identify that a common error is

occurring across multiple individuals, a process exists for that information to be fed to the process support staff. At that point, the process staff will provide to all impacted centers a reminder of what process should be followed and, if appropriate, a job aid. These communications are delivered via an automated system to every coach in the impacted centers for review with their teams.

- Internal Audits: In cases where a concern has been raised, the process staff may also choose to do an internal audit to evaluate the level of the issue. The application date audit information provided above is one such example. These audits can be one-time or ongoing depending on the circumstances. Again, the information is used to identify a need for job aids, process clarifications, reminders to the centers, or system enhancements.

- Legacy System Enhancements: As described above, Qwest has and continues to implement improved edits in its IMA system to address common LSR errors. Qwest also implements edits in its internal systems to reduce or eliminate common Qwest processing errors.

- New Service Order Accuracy PID: Finally, in response to KPMG's Manual Order Entry PID Adequacy study, Qwest developed a new performance measurement (PO-20) to report on order accuracy. Qwest agreed to provide and discuss additional data in the context of Long Term PID Administration forums. However, due to the time it often takes to negotiate a new PID, rather than wait for the final version, Qwest will begin reporting data under this PID in its June results reported in July 2002. The data collected under this PID will be an additional source of information for Qwest to drive ongoing process improvements.

Qwest's Response to Error When It Does Occur: Despite the best efforts of the CLECs and Qwest, some LSRs will be received with errors and will be processed incorrectly. Similarly, in some circumstances, complete and accurate LSRs will be received and processed incorrectly. In these cases, Qwest again provides several avenues for the CLEC to obtain assistance.

- Online Status Tools Available through IMA: These tools provide a CLEC visibility to the order throughout the process. In IMA 10.1, scheduled for August 2002, this tool-set will be enhanced to include service order detail, which will be provided following the FOC.

- ISC Help Desk: CLECs can contact the Help Desk with any LSR-related issue. This is the optimal contact point for issues specific to one LSR.

- Service Management Team Assigned to the CLEC: CLECs can contact their service managers at any issue. If the CLEC believes they are seeing a pattern of problems with their LSRs, this is the best avenue for them to raise that issue.

- Change Management Process (CMP): Through CMP, CLECs can request system, product or process changes that would improve their interaction with Qwest.

In summary, Qwest's data shows that the percentage of human errors experienced by CLECs in manually processed orders is within the range of reasonableness to be expected. It is certainly substantially less than the 15% alleged by AT&T and Covad. This is evidenced by the Liberty Data Reconciliation, and internal audits of manually processed orders. Nonetheless, Qwest has implemented several tools to help both CLECs and Qwest minimize the number of opportunities for human error. Finally, Qwest has also implemented a series of tools that will allow CLECs to seek additional changes to the ordering and provisioning process.

TAB 8

Question:

What is the reason for PO-20's exclusion for service orders that result from non-fatally errored LSRs?

Answer:

The purpose of PO-20 is to measure consistency between a service order and the LSR from which it was generated. By definition, an LSR that receives a non-fatal error notice has something wrong with the data that was provided. A CLEC has three options when a non-fatal error is received.

The first option is to issue a supplemental order to cancel in which case the service order would not meet the criteria for PO-20 because it never completed.

The second option is to issue a supplemental order to correct the error on the LSR. In this case, the original LSR would be marked inactive and would not be included in PO-20 because that version of the LS would not be completed. However, the service order could be compared against the new, corrected LSR. Once Qwest receives the supplemental order the supplemental order would count as a service order and be included in the applicable PO-20 calculation.

The third option is to verbally authorize the center to correct the LSR's error(s) when the service order(s) are created. In this case, the service order would be based on a combination of LSR information and verbal corrections. Therefore, the process allows a known difference between the LSR and the service order, and it would be inappropriate to apply the PO-20 rules and count that order as a failure.

TAB 9

Question:

Is there a mismatch between the Loop Qualification Tool and the raw loop database?

Answer:

Qwest provides the CLECs with uniform loop make-up information. Moreover, Qwest does not reject loop orders, as the question implies. Instead, Qwest utilizes an "11-Step Process" to try and free up a loop to meet the CLEC's request.

Specifically, the source of Qwest Loop information for the purpose of determining qualification for DSL services resides in a single database. However, Qwest utilizes this database to offer two distinct tools through IMA for the CLEC community. First, the Qwest DSL for Resale portion of the "Loop Qualification Tool" is the same tool used by Qwest retail to qualify its loops and is also used to qualify potential customers for resold Qwest DSL service. Qwest uses a proprietary algorithm (taking into account Qwest's vendor equipment specifications) in this tool. Thus, this tool returns either a "Yes" or a "No" response indicating whether the particular loop is qualified for Qwest DSL. The raw data (or source Loop data) that is used for this algorithm is the same as found in the Raw Loop Data Tool. The Unbundled Loop Qualification portion of this tool is used to determine if the unbundled loop meets the technical requirements defined for the ADSL-compatible Loop product. This portion of the tool returns two levels of data to the CLEC. First, the query returns a loop qualification tab, which provides loop status,[35] a loop qualification message that contains some loop information,[36] and finally the loop product availability code to indicate which products are available. Second, the loop data tab returns information regarding the underlying characteristics of the Loop.

Qwest also offers the "Raw Loop Data Tool," which provides the CLEC community with loop make-up source data. The loop make-up information, such as, length, gauge, pair gain if present, load coils, bridge taps, cable pair information, and terminal names, are all found in this database. The CLEC then can apply its own DSL qualification algorithm (or the functional equivalent thereto) to the underlying make-up information to make a determination of loop suitability. Since the Qwest Loop Qualification Tool uses a proprietary algorithm and Raw Loop Data Tool does not, it is possible that a customer's loop would not

35 The loop status field indicates whether the facilities qualify or not, whether a construction job, a bona fide request, or conditioning is required, and if the loop is too long.

36 The loop qualification message field returns: the telephone number or circuit ID (if the system is returning spare information it will contain a fictitious circuit ID); loop length; bridge tap length; the type of facility (copper or pair gain); the load type, if any; and the insertion loss calculated at 196 kilohertz frequency with 135 ohm terminations.

qualify using the Loop Qualification Tool under Qwest's algorithm, yet the CLEC would determine the same loop could serve customers using its flavor of DSL. Examples of this scenario are: a customer' loop is longer that what Qwest's DSL can support, or differences in acceptable noise levels between the CLEC and Qwest provided DSL service. Finally, if a CLEC is reselling Qwest DSL, the CLEC is bound by Qwest's own algorithm. If the CLEC is using unbundled elements, the CLEC sets its own parameters and uses its own algorithm.

In any event, however, Qwest does not reject orders for unbundled loops simply because they do not meet Qwest's standard for providing DSL. The SGAT, PCAT and Technical Publication all set forth the technical standards for providing a 2-Wire Non-Loaded Loop. Moreover, if the current loop does not meet this technical standard, Qwest will utilize the 11-Step process described in Exhibit WMC-LOOP-7 to William M. Campbell's Unbundled Loop Declaration. A "qualified" loop in the Raw Loop Data tool is simply not a prerequisite to ordering an unbundled loop to support xDSL.

TAB 10

Question:

From the Minnesota Discovery Request, was bulk MLT done to populate the Loop Qualification database?

Answer:

Bulk MLT Tests

When the Loop Qualification database was initially loaded with loop information from LFACs, some of the loops did not contain loop length, showing missing segments. As a result, Qwest (then U S WEST) performed some MLT tests to extract MLT distance data and, together with other distance database record information, obtained the estimated loop length for the missing segments and algorithmically populated the appropriate data for those segment distances for which it applied in the Loop Qualification database. Because both retail and CLECs use this database to perform loop qualification queries, and CLECs use this database to obtain raw loop data, this information is equally available to both Qwest Retail and CLECs. Any MLT distance data that was not used to populate the missing segments was referred to a dedicated engineering team for manual handling. The MLT system that Qwest currently has deployed does not return information on the presence of bridged taps and load coils. Thus, this extraction would not have had any such data from MLT and load coil and bridged tap information was not a part of this effort. For those missing segments which could not be fixed by this data extraction for distance information, Qwest again moved to improve its information by dedicating an engineering group of Senior and Lead engineers, to improving the information provided in LQDB. This is done via careful manual review of manual engineering records and back office systems to determine cable distances. Once the data is determined it is input to LFACS, which feeds the loop qualification data base. This dedication served both Qwest and the CLECs with its resulting improvement to LQDB.

History

A preliminary and limited Loop Qualification Database came into existence in the fall of 1998. This version contained limited loop information, but did not contain tariff information or DSLAM installation information. Believing that it would be more useful and accurate, Qwest moved to create LQDB as the single source to obtain loop qualification information. A revised LQDB, complete with loop information, tariff information, and DSLAM installation information (for those wire centers where Qwest had deployed DSLAM equipment), and which offered consistent yes and no answers for Retail DSL qualification began production in the spring of 1999. All additional wire centers were loaded into the LQDB in the spring of 2000. With the addition of the remainder of the wire centers, CLECs have the ability to obtain loop qualification information for all

wire centers, even those in which Qwest does not provide DSL services. Since that time, Qwest has continued to add functionality to the LQDB, for example:

- The ability to query by TN (up to 24) or address (up to 24 loops)
- The ability to query for resale or unbundled services
- The ability to receive loop makeup information on published or non-published numbers
- The ability to receive loop makeup information on assigned/working loops
- The ability to receive loop makeup information on unassigned/spare loops
- The ability to receive loop makeup information on loops assigned to CLECs as well as Qwest, and
- A "recent changes" check, whereby the most up-to-date loop information is retrieved from LFACS.

Arizona Agreement

In Arizona, Qwest, with input from both AT&T and Covad, agreed to the following SGAT language. Qwest will be incorporating this language in all of its SGATs as those documents are updated.

> 9.2.2.8.6: If the Loop make-up information for a particular facility is not contained in the Loop qualification tools, if the Loop qualification tools return unclear or incomplete information, or if CLEC identifies any inaccuracy in the information returned from the Loop qualification tools, and provides Qwest with the basis for CLEC's belief that the information is inaccurate, then CLEC may request, and Qwest will perform a manual search of the company's records, back office systems and databases where Loop information resides. Qwest will provide CLEC via email, the Loop information identified during the manual search within forty-eight (48) hours of Qwest's receipt of 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, the existence of any terminals, such as remote terminals or digital Loop terminals, Bridged Tap, and load coils; Loop length, and wire gauge. In the case of Loops served by digital Loop carrier, the email will provide the availability of spare feeder and distribution facilities that could be used to provision service to the Customer, including any spare facilities not connected to the Switch and Loop makeup for such spare facilities. After completion of the investigation, Qwest will load the information into the LFACS database, which will populate this Loop information into the fields in the Loop qualification tools.

TAB 11

Question:

Provide the references, within the record, to the Bulk Deloading Program.

Answer:

- Multi-state Transcript, pages 10-11 (April 30, 2001). See Attachment 5, Appendix K, Iowa Volume 1, Tab 372
- Multi-state Transcript pages 114 and 313-315 (May 1, 2001). See Attachment 5, Appendix K, Iowa Volume 1, Tab 409
- Exhibit WS6-QWE-JML-4 at pages 3-9 is discussed in the transcript on April 30, 2001. See Attachment 5, Appendix K, Idaho Volume 1, Tab 414
- Colorado Workshop Transcript, November 1, 2000 at pages 179-200. See Attachment 5, Appendix K, Colorado, Volume 1 Tab 409
- Emerging Services Rebuttal Exhibits of Karen Stewart, dated October 25, 2000. See Attachment 5, Appendix K, Colorado Volume 1, Tab 408. Exhibit KAS-12 is the letter of Notification sent to CLECs regarding Bulk Deload Project discussed in transcript
- Colorado Transcript dated April 18, 2001, pages 51-63 and page 217. See Attachment 5, Appendix K, Colorado Volume 1, tab 676
- *See also* www.qwest.com/disclosure459/deload.html.

TAB 12

Question:

Where is the data on repeat repair report data for loops?

Answer:

The PID calls for reporting MR-7, "Repair Repeat Report Rate," for the following loop types: Analog, NL-2-Wire, NL-4-wire, DS1-capable, ISDN-capable, ADSL-qualified, DS3 & higher, Dark Fiber. (Please see Qwest's Performance Indicator Definitions (PID) document, "ROC 271 Working PID Version 5.0," page 57.) Because these loop types are reported under "Zone-type" reporting, they are reported under MR-7D (Zone 1) and MR-7E (Zone 2).

In Qwest's reported Commercial Performance results (for May 01 through Apr 02), checklist format dated May 16, 2002, results for these measurements can be found in the locations indicated in the Table of Contents for these loop types, under "Checklist #4" and the specific loop names, e.g., "Unbundled Loop - Analog Repair." For example, results for Unbundled Loop repair (which, for each loop type, follow the respective installation results), including MR-7D and MR-7E, are found in the following locations:

-- Colorado report (Exb. D_0380): pp. 115-162.
-- Idaho report (Exb. D_0390): pp. 110-157.
-- Iowa report (Exb. D_400): pp. 106-153.
-- Nebraska report (Exb. D_410): pp. 106-153.
-- North Dakota report (Exb. D_420): pp. 99-129.
-- Qwest 14-state Regional (Exb. D_430): pp. 116-153.

The same results are also found in the FCC-formatted reports (Exbs. D_0310 through D_0370), also under measurements MR-7D and MR-7E, in locations specified by the Table of Contents. These results are summarized in the "blue charts" (Exbs. D_0250 through D_0300) on the pages dealing with Checklist #4 Repair.

For your convenience, attached are the January - May, 2002 MR-7 unbundled loop results for Qwest Regional, Colorado, Iowa, Idaho, Nebraska, and North Dakota.

Qwest Repair Repeat Report Rate Data for Unbundled Loop Products – January to May

Regional
Colorado
Iowa
Idaho
Nebraska
North Dakota

Att. 12-A

Qwest Regional MR 7D Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	286	2241	12.76%	33.37%	20015	148139	13.51%	-1.03	-1.63
Feb-02	217	1762	12.32%	32.86%	17277	128857	13.41%	-1.34	-1.81
Mar-02	204	1936	10.54%	30.70%	18778	136418	13.77%	-4.09	-3.49
Apr-02	247	2072	11.92%	32.40%	18684	137448	13.59%	-2.21	-2.34
May-02	262	2221	11.80%	32.26%	18817	141843	13.27%	-2.03	-2.23

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	15	114	13.16%	33.80%	274	1546	17.72%	-1.23	-1.75
Feb-02	15	100	15.00%	35.71%	268	1368	19.59%	-1.12	-1.68
Mar-02	14	123	11.38%	31.76%	249	1373	18.14%	-1.86	-2.13
Apr-02	30	165	18.18%	38.57%	292	1458	20.03%	-0.56	-1.34
May-02	17	141	12.06%	32.56%	275	1424	19.31%	-2.08	-2.27

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	0	4	0.00%	0.00%	1006	3826	26.29%	-1.19	-1.73
Feb-02	0	2	0.00%	0.00%	851	3437	24.76%	-0.81	-1.49
Mar-02	1	5	20.00%	40.00%	996	3631	27.43%	-0.37	-1.23
Apr-02	0	3	0.00%	0.00%	1179	3895	30.27%	-1.14	-1.69
May-02	0	5	0.00%	0.00%	1201	3893	30.85%	-1.49	-1.91

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	45	121	37.19%	48.33%	1006	3826	26.29%	2.59	0.57
Feb-02	27	112	24.11%	42.77%	851	3437	24.76%	-0.16	-1.1
Mar-02	33	151	21.85%	41.33%	996	3631	27.43%	-1.5	-1.91
Apr-02	65	181	35.91%	47.97%	1179	3895	30.27%	1.59	-0.03
May-02	61	208	29.33%	45.53%	1201	3893	30.85%	-0.46	-1.28

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	22	123	17.89%	38.32%	274	1546	17.72%	0.06	-0.96
Feb-02	16	114	14.04%	34.74%	268	1368	19.59%	-1.44	-1.87
Mar-02	34	147	23.13%	42.17%	249	1373	18.14%	1.45	-0.12
Apr-02	33	177	18.64%	38.95%	292	1458	20.03%	-0.43	-1.26
May-02	46	190	24.21%	42.84%	275	1424	19.31%	1.57	-0.05

Unbundled Loop – ADSL Qualified (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	2	18	11.11%	31.43%	663	2435	27.23%	-1.53	-1.93
Feb-02	1	12	8.33%	27.64%	543	1516	35.82%	-1.98	-2.2
Mar-02	1	14	7.14%	25.75%	684	2005	34.11%	-2.12	-2.29
Apr-02	1	10	10.00%	30.00%	656	2023	32.43%	-1.51	-1.92
May-02	3	15	20.00%	40.00%	793	2556	31.03%	-0.92	-1.56

Qwest Regional MR 7E Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	30	311	9.65%	29.52%	5446	41134	13.24%	-1.86	-2.13
Feb-02	39	361	10.80%	31.04%	4706	36302	12.96%	-1.22	-1.74
Mar-02	23	361	6.37%	24.42%	5160	39722	12.99%	-3.72	-3.26
Apr-02	43	506	8.50%	27.89%	5640	43916	12.84%	-2.9	-2.77
May-02	53	595	8.91%	28.49%	6045	46962	12.87%	-2.87	-2.74

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	4	48	8.33%	27.64%	29	207	14.01%	-1.02	-1.62
Feb-02	6	38	15.79%	36.46%	48	210	22.86%	-0.95	-1.58
Mar-02	7	62	11.29%	31.65%	40	198	20.20%	-1.53	-1.93
Apr-02	6	72	8.33%	27.64%	53	206	25.73%	-2.91	-2.77
May-02	4	65	6.15%	24.03%	38	205	18.54%	-2.24	-2.36

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					440	1723	25.54%		
Feb-02					432	1668	25.90%		
Mar-02					513	1888	27.17%		
Apr-02					656	2123	30.90%		
May-02	2	3	66.67%	47.14%	595	2182	27.27%	1.28	-0.22

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	4	15	26.67%	44.22%	440	1723	25.54%	0.13	-0.92
Feb-02	7	21	33.33%	47.14%	432	1668	25.90%	0.77	-0.53
Mar-02	3	14	21.43%	41.03%	513	1888	27.17%	-0.48	-1.29
Apr-02	6	32	18.75%	39.03%	656	2123	30.90%	-1.48	-1.9
May-02	15	29	51.72%	49.97%	595	2182	27.27%	2.76	0.68

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	5	23	21.74%	41.25%	29	207	14.01%	0.96	-0.42
Feb-02	0	15	0.00%	0.00%	48	210	22.86%	-2.04	-2.24
Mar-02	2	18	11.11%	31.43%	40	198	20.20%	-0.92	-1.56
Apr-02	3	29	10.34%	30.45%	53	206	25.73%	-1.77	-2.08
May-02	8	49	16.33%	36.96%	38	205	18.54%	-0.36	-1.22

Unbundled Loop – ADSL Qualified (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	1	4	25.00%	43.30%	90	402	22.39%	0.16	-0.91
Feb-02	1	6	16.67%	37.27%	83	266	31.20%	-0.76	-1.46
Mar-02	0	5	0.00%	0.00%	96	319	30.09%	-1.46	-1.89
Apr-02	0	4	0.00%	0.00%	100	273	36.63%	-1.51	-1.92
May-02	1	6	16.67%	37.27%	132	451	29.27%	-0.67	-1.41

Arizona MR 7D Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	47	255	18.43%	38.77%	5482	38325	14.30%	1.83	0.11
Feb-02	35	226	15.49%	36.18%	4604	33272	13.84%	0.72	-0.56
Mar-02	32	250	12.80%	33.41%	4779	32958	14.50%	-0.76	-1.46
Apr-02	24	263	9.13%	28.80%	4703	31610	14.88%	-2.61	-2.59
May-02	38	279	13.62%	34.30%	4240	30871	13.73%	-0.06	-1.03

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	3	24	12.50%	33.07%	50	283	17.67%	-0.64	-1.39
Feb-02	6	19	31.58%	46.48%	36	232	15.52%	1.67	0.02
Mar-02	3	18	16.67%	37.27%	41	234	17.52%	-0.09	-1.06
Apr-02	3	23	13.04%	33.68%	66	273	24.18%	-1.2	-1.73
May-02	2	19	10.53%	30.69%	45	260	17.31%	-0.75	-1.46

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					240	913	26.29%		
Feb-02					182	810	22.47%		
Mar-02					236	813	29.03%		
Apr-02					308	904	34.07%		
May-02					308	909	33.88%		

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	3	10	30.00%	45.83%	240	913	26.29%	0.29	-0.82
Feb-02	1	7	14.29%	34.99%	182	810	22.47%	-0.52	-1.31
Mar-02	4	27	14.81%	35.52%	236	813	29.03%	-1.6	-1.97
Apr-02	11	26	42.31%	49.40%	308	904	34.07%	0.87	-0.47
May-02	14	36	38.89%	48.75%	308	909	33.88%	0.62	-0.62

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	8	30	26.67%	44.22%	50	283	17.67%	1.17	-0.29
Feb-02	7	27	25.93%	43.82%	36	232	15.52%	1.32	-0.2
Mar-02	5	30	16.67%	37.27%	41	234	17.52%	-0.12	-1.07
Apr-02	8	47	17.02%	37.58%	66	273	24.18%	-1.06	-1.64
May-02	18	55	32.73%	46.92%	45	260	17.31%	2.47	0.5

Colorado MR 7D Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	75	523	14.34%	35.05%	3769	27989	13.47%	0.58	-0.65
Feb-02	45	350	12.86%	33.47%	3203	23604	13.57%	-0.39	-1.23
Mar-02	45	478	9.41%	29.20%	4050	28529	14.20%	-2.97	-2.81
Apr-02	48	443	10.84%	31.08%	3505	25318	13.84%	-1.82	-2.11
May-02	74	521	14.20%	34.91%	4390	31844	13.79%	0.27	-0.83

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	1	22	4.55%	20.83%	96	447	21.48%	-1.89	-2.15
Feb-02	2	22	9.09%	28.75%	88	395	22.28%	-1.45	-1.88
Mar-02	3	22	13.64%	34.32%	99	439	22.55%	-0.98	-1.59
Apr-02	3	22	13.64%	34.32%	94	386	24.35%	-1.14	-1.69
May-02	0	19	0.00%	0.00%	101	429	23.54%	-2.37	-2.44

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					237	931	25.46%		
Feb-02					203	841	24.14%		
Mar-02	0	1	0.00%	0.00%	245	944	25.95%	-0.59	-1.36
Apr-02	0	1	0.00%	0.00%	271	942	28.77%	-0.64	-1.39
May-02	0	1	0.00%	0.00%	303	994	30.48%	-0.66	-1.4

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	2	10	20.00%	40.00%	237	931	25.46%	-0.39	-1.24
Feb-02	9	27	33.33%	47.14%	203	841	24.14%	1.08	-0.35
Mar-02	10	24	41.67%	49.30%	245	944	25.95%	1.66	0.01
Apr-02	19	44	43.18%	49.53%	271	942	28.77%	1.99	0.21
May-02	21	53	39.62%	48.91%	303	994	30.48%	1.38	-0.16

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	0	13	0.00%	0.00%	96	447	21.48%	-1.86	-2.13
Feb-02	2	14	14.29%	34.99%	88	395	22.28%	-0.71	-1.43
Mar-02	5	22	22.73%	41.91%	99	439	22.55%	0.05	-0.97
Apr-02	10	32	31.25%	46.35%	94	386	24.35%	0.86	-0.48
May-02	6	33	18.18%	38.57%	101	429	23.54%	-0.7	-1.43

Colorado MR 7E Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	10	35	28.57%	45.18%	694	4520	15.35%	2	0.21
Feb-02	2	28	7.14%	25.75%	504	3832	13.15%	-0.94	-1.57
Mar-02	2	37	5.41%	22.61%	682	4567	14.93%	-1.62	-1.98
Apr-02	5	44	11.36%	31.74%	548	4164	13.16%	-0.35	-1.21
May-02	4	58	6.90%	25.34%	717	5115	14.02%	-1.55	-1.94

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	0	10	0.00%	0.00%	8	38	21.05%	-1.45	-1.88
Feb-02	1	7	14.29%	34.99%	12	45	26.67%	-0.69	-1.42
Mar-02	1	4	25.00%	43.30%	7	41	17.07%	0.34	-0.79
Apr-02	0	6	0.00%	0.00%	14	53	26.42%	-1.39	-1.85
May-02	0	4	0.00%	0.00%	11	47	23.40%	-1.06	-1.65

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					75	291	25.77%		
Feb-02					78	325	24.00%		
Mar-02					87	339	25.66%		
Apr-02					117	322	36.34%		
May-02					80	311	25.72%		

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	1	3	33.33%	47.14%	75	291	25.77%	0.29	-0.83
Feb-02	2	4	50.00%	50.00%	78	325	24.00%	1.06	-0.35
Mar-02	1	3	33.33%	47.14%	87	339	25.66%	0.29	-0.82
Apr-02	2	7	28.57%	45.18%	117	322	36.34%	-0.42	-1.26
May-02	2	2	100.00%	0.00%	80	311	25.72%	1.86	0.13

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	0	6	0.00%	0.00%	8	38	21.05%	-1.18	-1.71
Feb-02	0	3	0.00%	0.00%	12	45	26.67%	-1.01	-1.61
Mar-02	0	3	0.00%	0.00%	7	41	17.07%	-0.76	-1.46
Apr-02	0	6	0.00%	0.00%	14	53	26.42%	-1.39	-1.85
May-02	4	12	33.33%	47.14%	11	47	23.40%	0.67	-0.59

Iowa MR 7D Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	17	144	11.81%	32.27%	571	5264	10.85%	0.39	-0.76
Feb-02	20	142	14.08%	34.79%	622	5421	11.47%	0.96	-0.42
Mar-02	13	124	10.48%	30.63%	733	5638	13.00%	-0.82	-1.5
Apr-02	20	118	16.95%	37.52%	964	7678	12.56%	1.39	-0.15
May-02	16	160	10.00%	30.00%	1076	7831	13.74%	-1.36	-1.83

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	4	6	66.67%	47.14%	3	24	12.50%	2.47	0.5
Feb-02	0	2	0.00%	0.00%	4	33	12.12%	-0.51	-1.31
Mar-02	0	4	0.00%	0.00%	7	36	19.44%	-0.93	-1.57
Apr-02	0	2	0.00%	0.00%	12	57	21.05%	-0.72	-1.44
May-02	0	7	0.00%	0.00%	13	46	28.26%	-1.55	-1.94

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					52	124	41.94%		
Feb-02					36	113	31.86%		
Mar-02					42	144	29.17%		
Apr-02					45	134	33.58%		
May-02					53	145	36.55%		

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					52	124	41.94%		
Feb-02					36	113	31.86%		
Mar-02					42	144	29.17%		
Apr-02					45	134	33.58%		
May-02					53	145	36.55%		

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	1	9	11.11%	31.43%	3	24	12.50%	-0.11	-1.07
Feb-02	0	7	0.00%	0.00%	4	33	12.12%	-0.89	-1.54
Mar-02	0	7	0.00%	0.00%	7	36	19.44%	-1.19	-1.72
Apr-02	1	6	16.67%	37.27%	12	57	21.05%	-0.25	-1.15
May-02	1	8	12.50%	33.07%	13	46	28.26%	-0.91	-1.56

Iowa MR 7E Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	7	56	12.50%	33.07%	299	2906	10.29%	0.57	-0.66
Feb-02	8	89	8.99%	28.60%	358	2970	12.05%	-0.88	-1.53
Mar-02	9	90	10.00%	30.00%	425	3437	12.37%	-0.67	-1.41
Apr-02	15	133	11.28%	31.63%	515	4202	12.26%	-0.34	-1.21
May-02	14	134	10.45%	30.59%	581	4678	12.42%	-0.68	-1.41

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	0	2	0.00%	0.00%	0	1	0.00%	N/A	N/A
Feb-02	1	1	100.00%	0.00%	1	6	16.67%	1.13	-0.31
Mar-02	0	1	0.00%	0.00%	0	2	0.00%	N/A	N/A
Apr-02	0	1	0.00%	0.00%	0	4	0.00%	N/A	N/A
May-02	0	1	0.00%	0.00%	0	4	0.00%	N/A	N/A

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					15	71	21.13%		
Feb-02					22	103	21.36%		
Mar-02					15	63	23.81%		
Apr-02					36	167	21.56%		
May-02					48	141	34.04%		

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					15	71	21.13%		
Feb-02					22	103	21.36%		
Mar-02					15	63	23.81%		
Apr-02					36	167	21.56%		
May-02					48	141	34.04%		

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	3	6	50.00%	50.00%	0	1	0.00%	N/A	-0.67
Feb-02	0	2	0.00%	0.00%	1	6	16.67%	-0.55	-1.33
Mar-02					0	2	0.00%		
Apr-02					0	4	0.00%		
May-02	0	4	0.00%	0.00%	0	4	0.00%	N/A	N/A

Idaho MR 7D Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	1	18	5.56%	22.91%	448	3618	12.38%	-0.88	-1.53
Feb-02	1	12	8.33%	27.64%	334	2755	12.12%	-0.4	-1.24
Mar-02	1	18	5.56%	22.91%	371	3109	11.93%	-0.83	-1.51
Apr-02	6	18	33.33%	47.14%	465	3638	12.78%	2.25	0.37
May-02	1	9	11.11%	31.43%	370	3165	11.69%	-0.05	-1.03

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					9	43	20.93%		
Feb-02	1	1	100.00%	0.00%	11	35	31.43%	0.99	-0.4
Mar-02	1	1	100.00%	0.00%	10	36	27.78%	1.07	-0.35
Apr-02	0	2	0.00%	0.00%	8	43	18.60%	-0.66	-1.4
May-02	1	2	50.00%	50.00%	10	40	25.00%	0.62	-0.62

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					13	50	26.00%		
Feb-02					14	44	31.82%		
Mar-02					15	52	28.85%		
Apr-02					17	52	32.69%		
May-02					25	64	39.06%		

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					13	50	26.00%		
Feb-02					14	44	31.82%		
Mar-02					15	52	28.85%		
Apr-02					17	52	32.69%		
May-02					25	64	39.06%		

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					9	43	20.93%		
Feb-02					11	35	31.43%		
Mar-02	0	1	0.00%	0.00%	10	36	27.78%	-0.61	-1.37
Apr-02	0	1	0.00%	0.00%	8	43	18.60%	-0.47	-1.29
May-02	0	1	0.00%	0.00%	10	40	25.00%	-0.57	-1.35

Idaho MR 7E Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	0	15	0.00%	0.00%	279	2322	12.02%	-1.43	-1.87
Feb-02	2	17	11.76%	32.22%	221	2038	10.84%	0.19	-0.89
Mar-02	0	13	0.00%	0.00%	251	2298	10.92%	-1.26	-1.77
Apr-02	0	24	0.00%	0.00%	368	3287	11.20%	-1.73	-2.05
May-02	4	19	21.05%	40.77%	416	3054	13.62%	0.92	-0.44

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	0	1	0.00%	0.00%	2	6	33.33%	-0.65	-1.4
Feb-02					2	12	16.67%		
Mar-02	1	4	25.00%	43.30%	1	3	33.33%	-0.23	-1.14
Apr-02	3	6	50.00%	50.00%	2	5	40.00%	0.18	-0.89
May-02	0	2	0.00%	0.00%	0	7	0.00%	N/A	N/A

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					14	51	27.45%		
Feb-02					12	43	27.91%		
Mar-02					19	68	27.94%		
Apr-02					23	103	22.33%		
May-02					26	73	35.62%		

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					14	51	27.45%		
Feb-02					12	43	27.91%		
Mar-02					19	68	27.94%		
Apr-02	0	1	0.00%	0.00%	23	103	22.33%	-0.53	-1.32
May-02					26	73	35.62%		

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					2	6	33.33%		
Feb-02					2	12	16.67%		
Mar-02	0	1	0.00%	0.00%	1	3	33.33%	-0.61	-1.37
Apr-02					2	5	40.00%		
May-02	0	1	0.00%	0.00%	0	7	0.00%	N/A	N/A

North Dakota MR 7E Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	5	57	8.77%	28.29%	177	1414	12.52%	-0.84	-1.51
Feb-02	10	70	14.29%	34.99%	174	1273	13.67%	0.18	-0.89
Mar-02	4	55	7.27%	25.97%	167	1361	12.27%	-1.11	-1.67
Apr-02	5	77	6.49%	24.64%	234	1828	12.80%	-1.62	-1.99
May-02	10	113	8.85%	28.40%	346	2346	14.75%	-1.73	-2.05

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	2	8	25.00%	43.30%	1	9	11.11%	0.62	-0.62
Feb-02	2	10	20.00%	40.00%	3	12	25.00%	-0.27	-1.16
Mar-02	0	12	0.00%	0.00%	1	4	25.00%	-1	-1.61
Apr-02	0	23	0.00%	0.00%	0	3	0.00%	N/A	N/A
May-02	0	17	0.00%	0.00%	0	6	0.00%	N/A	N/A

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					10	33	30.30%		
Feb-02					3	10	30.00%		
Mar-02					18	76	23.68%		

Apr-02					12	47	25.53%		
May-02					12	50	24.00%		

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					10	33	30.30%		
Feb-02					3	10	30.00%		
Mar-02	0	1	0.00%	0.00%	18	76	23.68%	-0.55	-1.34
Apr-02					12	47	25.53%		
May-02	0	2	0.00%	0.00%	12	50	24.00%	-0.78	-1.47

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					1	9	11.11%		
Feb-02					3	12	25.00%		
Mar-02					1	4	25.00%		
Apr-02					0	3	0.00%		
May-02					0	6	0.00%		

Unbundled Loop – ADSL Qualified (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	1	3	33.33%	47.14%	5	32	15.63%	0.63	-0.61
Feb-02	0	2	0.00%	0.00%	6	12	50.00%	-1.31	-1.8
Mar-02	3	16	18.75%		3	16	18.75%		
Apr-02	0	2	0.00%	0.00%	8	18	44.44%	-1.2	-1.73
May-02	0	2	0.00%	0.00%	5	23	21.74%	-0.71	-1.43

Nebraska MR 7D Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	14	139	10.07%	30.10%	320	2758	11.60%	-0.55	-1.33
Feb-02	15	114	13.16%	33.80%	311	2514	12.37%	0.28	-0.83
Mar-02	13	113	11.50%	31.91%	332	2488	13.34%	-0.56	-1.34
Apr-02	19	128	14.84%	35.55%	400	3086	12.96%	0.63	-0.61
May-02	20	131	15.27%	35.97%	468	3253	14.39%	0.3	-0.82

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	0	8	0.00%	0.00%	8	45	17.78%	-1.21	-1.74
Feb-02	0	4	0.00%	0.00%	3	36	8.33%	-0.57	-1.35
Mar-02	0	7	0.00%	0.00%	3	26	11.54%	-0.85	-1.52

Apr-02	2	11	18.18%	38.57%	5	45	11.11%	0.6	-0.64
May-02	3	14	21.43%	41.03%	6	26	23.08%	-0.12	-1.07

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					18	86	20.93%		
Feb-02					27	126	21.43%		
Mar-02					32	119	26.89%		
Apr-02					32	121	26.45%		
May-02					37	101	36.63%		

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					18	86	20.93%		
Feb-02					27	126	21.43%		
Mar-02					32	119	26.89%		
Apr-02	1	2	50.00%	50.00%	32	121	26.45%	0.61	-0.63
May-02	1	1	100.00%	0.00%	37	101	36.63%	0.9	-0.45

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	1	5	20.00%	40.00%	8	45	17.78%	0.11	-0.93
Feb-02	0	2	0.00%	0.00%	3	36	8.33%	-0.42	-1.25
Mar-02	1	8	12.50%	33.07%	3	26	11.54%	0.04	-0.98
Apr-02	2	5	40.00%	48.99%	5	45	11.11%	1.48	-0.1
May-02	2	5	40.00%	48.99%	6	26	23.08%	0.71	-0.57

Nebraska MR 7E Data for Unbundled Loop Products

Unbundled Loop - Analog (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	0	8	0.00%	0.00%	138	1263	10.93%	-0.99	-1.6
Feb-02	1	22	4.55%	20.83%	138	1312	10.52%	-0.91	-1.55
Mar-02	1	13	7.69%	26.65%	167	1413	11.82%	-0.46	-1.28
Apr-02	4	26	15.38%	36.08%	222	1698	13.07%	0.39	-0.76
May-02	2	24	8.33%	27.64%	239	1879	12.72%	-0.64	-1.39

Unbundled Loop – 2 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02	0	1	0.00%	0.00%	0	1	0.00%	N/A	N/A
Feb-02	0	2	0.00%	0.00%	0	1	0.00%	N/A	N/A
Mar-02	0	3	0.00%	0.00%	0	1	0.00%	N/A	N/A

Apr-02	0	3	0.00%	0.00%					
May-02	0	3	0.00%	0.00%	0	1	0.00%	N/A	N/A

Unbundled Loop – 4 Wire Non-Loaded (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					11	40	27.50%		
Feb-02					18	59	30.51%		
Mar-02					16	46	34.78%		
Apr-02					22	75	29.33%		
May-02					24	81	29.63%		

Unbundled Loop – DS1 Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					11	40	27.50%		
Feb-02					18	59	30.51%		
Mar-02					16	46	34.78%		
Apr-02					22	75	29.33%		
May-02					24	81	29.63%		

Unbundled Loop – ISDN Capable (Parity)

Date	CLEC Numerator	CLEC Denominator	CLEC Result	CLEC Std Deviation	Qwest Numerator	Qwest Denominator	Qwest Result	Modified Z Score	Parity Score
Jan-02					0	1	0.00%		
Feb-02					0	1	0.00%		
Mar-02	0	2	0.00%	0.00%	0	1	0.00%	N/A	N/A
Apr-02	1	1	100.00%	0.00%					
May-02	0	1	0.00%	0.00%	0	1	0.00%	N/A	N/A

TAB 13

Question:

Provide definitions and more information about close out codes in Exhibit 29.

Answer:

Exhibit 29, Summary of Field Coding Process Audit, has five columns. This information is explained further below:

State: state in which the audit took place, i.e., Colorado, Iowa, Idaho, Nebraska, North Dakota, etc.

Week: week during which the audit took place. These audits are done weekly in each state.

# of observations: number of trouble tickets reviewed during the audit period. The local network management team does these observations. They review the trouble ticket to see if the disposition and cause code on the trouble report reflect the trouble reported and the work done to resolve the trouble. This is done by taking into account the trouble reported, results of tests done during trouble isolation, and the narrative section where the technician explains what s/he did to resolve the trouble. If the disposition and cause codes match accordingly, then the observation is considered as passed. Disposition and Cause Codes identify the reason for service problems. Disposition Codes indicate the action taken to clear the reported trouble, while Cause Codes indicate why.

For example, if the customer reports no dial tone and the trouble isolation test is open-out 5000 feet and the technician wrote in the narrative that s/he repaired a drop wire that was cut by the customer and the disposition and cause codes were 0381-208, then this ticket would be counted as passing.

The open-out test validates the "no dial tone" being reported. The definition of disposition code 0381 is "Buried Service Wire (BSW), Trouble in BSW - permanent repairs made and service has been restored". Cause code 208 reflects that the customer caused the trouble. Therefore, the disposition and cause codes match the narrative, the test, and the trouble reported.

passed: number of observations or trouble tickets that had correct disposition and cause codes in light of the trouble reported, test results, and technician narrative.

% Passing: percent of trouble tickets reviewed that had correct coding. This is calculated by taking the number of passing trouble tickets divided by the total number of trouble tickets reviewed.

Qwest's process for this audit is to have each network manager perform observations each week. The results are then compiled by a network "state lead" and forwarded to network corporate staff. The network corporate staff then produce the audit report as well as the analyses results, provide feedback to the state teams, and make modifications to the audit process, if necessary, to improve results.

TAB 14

Question:

Provide reference to discussion in the Application of the BI-4B issue involving reciprocal compensation.

Answer:

This matter is discussed by Thomas Freeberg in his Declaration concerning checklist Item 13: Reciprocal Compensation.

On December 11, 2001, a new configuration of the Agilent SS7 software was loaded into Qwest's network. Beginning at that point, a number of "long duration calls" occurred in error as calls were considered open far beyond the actual length of the call. These erroneous durations were reflected in bills sent to CLECs in the December/January timeframe. See Freeberg checklist Item 13 Reciprocal Compensation Declaration, Appendix A, Tab 26, at para. 57-59.

Following discovery of the Agilent software problem, analysis was done to identify the best way to correct this billing error. A decision was made to apply the individual calls as a credit back to the CLECs. This approach provided the call detail information to the CLECs so that they would have the necessary information to adjust end-users bills as desired.

As a result of crediting these calls to the CLECs, BI-4B was driven below its benchmark in several states. From a measurement perspective, these calls were viewed as credits for calls made in the December/January timeframe but not billed until second quarter, and therefore, were counted as a miss for BI-4B.

Qwest implemented daily monitoring scripts to prevent the recurrence of this problem. Other than the misses caused by this anomaly, BI-4B has been consistently above, not just the benchmark, but above 99% in the ROC I filing states since September 2001.

TAB 15

Question:

Provide the UNE-P* documentation that was given to the FCC in October, 2001.

Answer:

Attached is the document provided to the FCC in October, 2001.

Description of UNE-P Star Services:

- Consists of customized pricing and service arrangements for providing UNE-P POTS and UNE-P Centrex combination services
- UNE-P Star agreements require that certain volumes of UNE-P combinations to be maintained and/or ordered by the CLECs during the term of the agreements.
- UNE-P Star agreements require the parties to exchange local exchange traffic on a bill-and-keep basis, except for transiting traffic, for which the arbitrated or cost docket rates for transiting traffic apply.
- Qwest stands ready to negotiate similar customized UNE-P arrangements with other CLECs, or CLECs may opt into existing UNE-P Star agreements.
- UNE-P Star service is designed to address specific needs and concerns of CLECs.

UNE-P Star addresses the following CLEC needs:

- Provides the certainty that the unbundled elements which make up the UNE-P POTS and UNE-P Centrex combinations will continue to exist during the term of the agreement regardless of regulatory decisions that may remove Qwest's obligation to provide the elements;
- Provides more certainty of cost of the services to the CLEC since it does not fluctuate by minutes of use (*i.e.*, it is flat-rated up to 525 minutes per line/per month/per state, and then increases based on 50 minute increments);
- Provides access to finished retail services;
- Provides stable pricing across all zones; and
- Provides for the conversion of existing resold Centrex and business POTS services to UNE-P POTS and UNE-P Centrex combinations

Att. 15-A

Qwest

UNE Platform with 525 Minutes

04/03/02

State	Statewide Average Loop	Local Switching	Port	Shared Transport	Assumed Minutes	Local Switching @ 525 MOU	Shared Transport @ 525 MOU	UNE-P Loop,Port Loc. Sw. Sh. Trans.	McLeod	Eschelon
AZ	$ 21.98	$ 0.002800	$ 1.61	$ 0.001573	525	$ 1.47	$ 0.83	$ 25.89	30.80	30.80
CO	$ 18.00	$ 0.002830	$ 1.15	$ 0.001460	525	$ 1.49	$ 0.77	$ 21.40	34.00	34.00
IA	$ 20.15	$ 0.002130	$ 1.15	$ 0.001340	525	$ 1.12	$ 0.70	$ 23.12	28.30	
ID	$ 25.52	$ 0.002900	$ 1.34	$ 0.001591	525	$ 1.52	$ 0.84	$ 29.22	33.15	33.15
MN	$ 17.87	$ 0.001810	$ 1.08	$ 0.001484	525	$ 0.95	$ 0.78	$ 20.68	27.00	27.00
MT	$ 28.37	$ 0.004063	$ 1.58	$ 0.002118	525	$ 2.13	$ 1.11	$ 33.20	34.95	
ND	$ 19.75	$ 0.002500	$ 1.27	$ 0.001703	525	$ 1.31	$ 0.89	$ 23.23	28.30	28.30
NE	$ 15.79	$ 0.004131	$ 1.37	$ 0.001243	525	$ 2.17	$ 0.65	$ 19.98	35.95	35.95
NM	$ 20.50	$ 0.001108	$ 1.38	$ 0.001289	525	$ 0.58	$ 0.68	$ 23.14	27.15	27.15
OR	$ 15.00	$ 0.001330	$ 1.26	$ 0.001273	525	$ 0.70	$ 0.67	$ 17.63	26.90	26.90
SD	$ 21.09	$ 0.003469	$ 1.84	$ 0.001388	525	$ 1.82	$ 0.73	$ 25.48	29.45	
UT	$ 16.46	$ 0.002484	$ 0.91	$ 0.001280	525	$ 1.30	$ 0.67	$ 19.35	22.60	22.60
WA	$ 17.59	$ 0.001200	$ 1.34	$ 0.001219	525	$ 0.63	$ 0.64	$ 20.20	24.00	24.00
WY	$ 25.65	$ 0.003753	$ 1.53	$ 0.001207	525	$ 1.97	$ 0.63	$ 29.78	33.40	

Att. 15-B

TAB 16

Question:

Did the deaverage wire center lists that Qwest gave the DoJ rely upon the FCC's Synthesis Model (which appears to have errors)? Or, are the wire centers from Qwest records and reflect the existing wire centers correctly (i.e., sold wire centers are removed)?

Answer:

The list of wire centers included in each of Qwest's deaveraged UNE pricing zones, which Qwest previously provided to the DoJ, did not rely upon the FCC Synthesis Model. Qwest has rechecked the information that it provided to DOJ regarding these wire centers and filed as an ex parte in the record of WC Docket No. 02-148 on June 18, 2002. That information is correct.

TAB 17

Question:

Which of the five SGATs filed has 30 day Held Order process language in section 9.2.2?

Answer:

The 30 Day Held Order process appears in the Colorado and Iowa SGATs in section 9.2.2.16. This language does not appear in the Idaho, Nebraska, and North Dakota SGATs, but will be included in these SGATs and in all other jurisdictions as updated SGATS are filed in the normal course of business. However, it is currently our policy in all 14 states to follow the process set forth in the Colorado and Iowa SGATs. Attached is the notification letter sent through the change management process on May 16, 2002, notifying the CLEC's of the updated documentation related to the 30 day hold process specifically for unbundled loops, which is the UNE that is of most interest to the CLECs. Qwest is currently in the process of updating the remaining UNE product catalogs with this same 30 day hold policy.

Qwest

Announcement Date:	**May 16, 2002**
Effective Date:	**May 17, 2002**
Document Number:	**PROD.05.16.02.F.00760.Unbundled_Local_Loop**
Notification Category:	**Product Notification**
Target Audience:	**CLECs, Resellers**
Subject:	**CMP – Unbundled Local Loop – General Information**
Level of Change:	**Level 1**
Associated CR#:	**NA**

Summary of Change:
On May 17, 2002, Qwest will post updates to its Wholesale Product Catalog that includes updated documentation for Unbundled Local Loop – General Information. This material becomes effective on May 17, 2002.

The PCAT updates will include information regarding the spare facilities process and updates to the fields found on the LSR. Also, updated training information will be included in the revised PCAT.

You will find a summary of these updates on the attached Web Change Notification Form. Actual updates to the operational document are found on the Qwest Wholesale Web site at this URL: http://www.qwest.com/wholesale/pcat/unloop.html.

Comment Cycle:
No formal comment cycle applies. If you have any questions on this subject, please submit comments to the CMP Manager at cmpcr@qwest.com.

Sincerely,

Qwest

Note: In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party to such interconnection agreement.

Att. 17-A

Qwest

WEB CHANGE NOTIFICATION FORM:

Attention: **Changes have been made to Qwest's Wholesale Markets Web Page URL**
http://www.qwest.com/wholesale/

Product(s) Impacted: **Unbundled Local Loop – General Information**

Effective Date: **May 17, 2002**

Updated information/documentation will be posted to the Wholesale Markets web site that impact *Unbundled Local Loop – General Information*

This information will be found at URL: http://www.qwest.com/wholesale/pcat/unloop.html

If you do not see the following updates, hit the reload button on your Netscape Navigator, or refresh under view within Internet Explorer.

All updates are consistent with the information available in the Statement of Generally Available Terms (SGAT) URL http://www.qwest.com/about/policy/sgats/

Section	Sub Section	UPDATE / ACTIVITY
Product Name		Unbundled Local Loop – General Information - VDELETE 15 ADD16.0
History Log		(Link blue text to: "Unbundled Local Loop General Information History Log DELETEV15 04-11-02 ADDV16 06-17-02" download)
Pricing	Tariffs, Regulations and Policies	If you submit a request for a 2-Wire or 4-Wire Analog (Voice Grade) Unbundled Local Loop, and the loop is considered secondary service the normal assignment process described above will be followed in its entirety. ADD: If facilities can not be located and there is No Planned Engineering Job, your LSR will be held for 30 business days. If spare facilities become available, a FOC is generated and sent to you in response to your original LSR. If at the conclusion of the 30 business day hold, facilities are still unavailable, your order will be rejected. Exceptions may occur as mentioned above. If it is determined that facilities are not available, contact your Qwest Service Manager for other options. (Link blue text to: http://www.qwest.com/wholesale/clecs/accountmanagers.html) Information for CLEC requested Unbundled Network Elements (UNE) Construction is available in Qwest's CLEC Requested Unbundled Network Elements (UNE) Construction (CRUNEC). (Link blue text to: http://www.qwest.com/wholesale/clecs/crunec.html) When you submit an Unbundled Local Loop request for xDSL Services (i.e., 2-Wire or 4-Wire Non-Loaded Loop, ISDN BRI Capable Loop, ADSL Compatible Loop, xDSL-I Capable Loop), or a DS1 Capable Loop or DS3 Capable Loop, the normal assignment process will be followed in its entirety. ADD: If facilities can not be located and there is No Planned Engineering Job, your LSR will be held for 30 business days. If spare facilities become available, a FOC is generated and sent to you in response to your original LSR.

Att. 17-B

		If at the conclusion of the 30 business day hold facilities are still unavailable, your order will be rejected. Exceptions may occur, as mentioned above. If it is determined that facilities are not available, contact your Qwest Service Manager for other options. (Link blue text to: http://www.qwest.com/wholesale/clecs/accountmanagers.html) Information for CLEC requested UNE Construction is available in Qwest's CLEC Requested UNE Construction (CRUNEC). (Link blue text to: http://www.qwest.com/wholesale/clecs/crunec.html)
Implementation	Ordering	

LSR Field	Must Be Populated With
REQTYP	AB FOR Loop only or BB for Loop with LNP
ACT	V **DELETE** or Z
LNA	**DELETE** N **ADD** V
Manual Indicator	Y
ECCKT	Circuit Identification of the Private Line
DELETE CFA **ADD** APOT	**DELETE** Enter CFA information **ADD** Enter APOT information
Remarks	Include in the **DELETE** remarks Private Line to Unbundled Local Loop pricing conversion **ADD** remarks: Private Line to Unbundled Local Loop pricing conversion CFA information No CO work

Implementation	Ordering	The existing Private Line CLCI™ will be changed to an Unbundled Local Loop CLCI™ and is provided to you on your FOC. Once the CLCI™ is assigned, all subsequent design changes will require the Unbundled Local Loop CLCI™, and should be compliant with the design requirements identified in Technical Publication 77384. (Link blue text to: http://www.qwest.com/techpub/77384/77384.pdf) **ADD** Private Line to Unbundled Loop Pricing Conversion CLEC Job Aid is a document designed to provide guidance in performing LSR Order Form entries for the Private Line to Unbundled Loop Price Conversion. (Link blue text to: http://www.qwest.com/wholesale/training/desc_pl_ubl.html)
Implementation	Training	**ADD** Facility-Based CLECs and Reseller/Unbundled Network CLECs Directory Listing User Document The Qwest Facility-Based Competitive Local Exchange Carriers (CLECs) and Reseller/Unbundled Network CLECs Directory Listings User Document describes Qwest processes and business rules for working with you to establish and maintain directory listing information throughout Qwest's 14-state local service territory. You provide end-user directory listing information to Qwest to ensure that the end-user listings in Qwest's listing database are current and accurate. This makes your listings available to Qwest's Directory Assistance (DA) and for publication in published directories based on contractual agreements. Maintaining a comprehensive listing database, regardless of each end-user's Local Service Provider, ensures that end-users have access to complete DA information and the option to appear in a published White Page Directory.

		Please click here to learn more about this course and to register. (Link blue text to: **ADD** Interconnect Mediated Access (IMA) Directory Listing Training This course introduces the participant to the IMA functionality as well as the processes that need to be followed to establish, change and/or delete directory listing information. The participant will review the resources available to assist with Directory Listing questions and processes. A significant amount of time will be spent reviewing Qwest listing business rules and how to complete an Ordering and Billing Forum (OBF) Directory Form via IMA. Please click here to learn more about this course and to register. (Link blue text to: http://www.qwest.com/wholesale/training/bt_listing.html) **ADD** Private Line to Unbundled Loop Pricing Conversion - CLEC Job Aid The purpose of this job aid is to provide guidance in performing LSR Order Form entries for the Private Line to Unbundled Loop Price Conversion. Click here to learn more about this course and to register. (Link blue text to: http://www.qwest.com/wholesale/training/desc_pl_ubl.html) **ADD** Unbundled Loop (UBL) This instructor-led process and systems training course is designed to introduce and teach the Unbundled Loop (UBL) products, instructing CLECs on how to request service for Unbundled Loops. This course will provide an overview of the current UBL products and address the PreOrder, Order, Post-Order, Provisioning, Billing and CEMR Maintenance and Repair. Click here to learn more about this course and to register. (Link blue text to: http://www.qwest.com/wholesale/training/ilt_desc_unbundled_lsr.html)

TAB 18

Question:

What date was Quick Loop made available?

Answer:

Quick Loop was available in Arizona, Colorado, Idaho, Montana, New Mexico, Utah and Wyoming effective February 22, 2001.

Quick Loop was available in Iowa, Nebraska, Minnesota, North Dakota, South Dakota, Oregon and Washington effective April 30, 2001.

TAB 19

Question:

The loop volumes cited in the Loop Affidavit in paragraphs 4 and 72 do not match. Explain.

Answer:

Paragraph 72 of the Loop Affidavit reflects the appropriate loop volumes as of March 31, 2001, which is 112,121. Paragraph 4 of the Loop Affidavit inadvertently included loops from Utah. The correct volumes are in paragraph 72.

TAB 20

Question:

Provide the location in the Appendix of the last Liberty Audit report regarding OP-4.

Answer:

Attached is the Report of the Audit of Changes Affecting OP-3 and OP-4 Application Date and Conditioned Loop Reporting. It is located in Appendix D -- Performance Measures and Results, Tab 16.1.

APPLICATION BY QWEST COMMUNICATIONS INTERNATIONAL INC. FOR PROVISION OF IN-REGION, INTERLATA SERVICES IN COLORADO, IDAHO, IOWA, NEBRASKA AND NORTH DAKOTA TABLE OF CONTENTS

Appendix D – Performance Measures and Results

Att. 20-A

Report of the Audit of Changes Affecting OP-3 and OP-4 Application Date and Conditioned Loop Reporting

A. Introduction and Background

Liberty audited two changes that Qwest recently made to the reporting of performance. The first was a change to properly set the application date on flow-through orders received after specific cut-off times. The second change involved the determination and reporting of conditioned loop provisioning commitments and intervals.

Application Date

Qwest made programming changes to more precisely account for the cut-off times for LSRs that are specified in the PID. The reason that a change was required was because orders may have been assigned an incorrect application date when they flowed through the ordering system without manual intervention. In cases where a flow-through order was received after the 3 PM and 7 PM cut-off times specified in the PID for designed and non-designed services, respectively, the application date was earlier than the case of a manually processed order and inconsistent with the PID. The effect of this situation was to calculate the provisioning interval incorrectly for some OP-4 orders.

To accomplish this change, Qwest had to acquire additional information from the Customer Records Management (CRM) system for use in calculating OP-4. This information included the date and time that the LSR was received and an indication of whether the order flowed through the ordering system without manual intervention. Qwest created new fields for RSOR that set a flag for incorporating the logic of which orders could be affected by the issue (e.g., flow-through unbundled loop orders received after 7 PM) and that set the interval for OP-4. The programming was complicated by the fact that certain types of orders (e.g., non-dispatched resale business) consider Saturday a business day while other types of orders do not.

The PID defines the application date and time as the date and time on which Qwest receives from the CLEC a complete and accurate local service request (LSR) or access service request (ASR) or retail order, except that for some orders the application date and time is the start of the next business day. These exceptions are:

- LSRs and ASRs received after 3:00 PM MT for Designed Services
- Retail orders received after 3:00 PM local time for Designed Services
- LSRs received after 7:00 PM MT for POTS Resale (Residence and Business), Non-Design Resale Centrex, non-designed UNE-P, and Unbundled Loops.

Conditioned Loop Reporting

Qwest first started reporting conditioned loops provisioning commitments met and intervals (OP-3 and OP-4) in September 2001. Liberty did not audit this additional product disaggregation reporting. Qwest's internal analysis of reported results indicated that too many orders were being reported as conditioned loops, and as a result, Qwest temporarily discontinued reporting this product in February 2002. Qwest found that in at least some parts of its region USOC codes for line conditioning activities were being assigned even if line conditioning may not have been required.

To correct this problem, Qwest's reporting systems were made to capture additional data and more specifically identify unbundled and line-share loops that required conditioning. Qwest then began reporting results for this product starting with the April 2002 results that included recalculated results for the period December 2001 through April 2002. Results reporting for conditioned loops affects only OP-3D, OP-3E, OP-4D, and OP-4E.

Qwest's capturing and processing of ordering information identifies conditioned loops in several ways. For example, if a line-share order, which presumably is on a working line, requires dispatch, the order is flagged as conditioning required. Also, information from a system called the Referral Tracking Tool (RTT) is used to identify specific activities associated with conditioning such as removal of bridge taps and load coils. Other identification mechanisms include the use of a jeopardy code that is specific to a local loop requiring conditioning and USOC codes for the non-recurring charges associated with the removal of bridge taps and load coils.

B. Overall Summary

No exceptions or observations were identified during Liberty's audit of these changes to Qwest's performance measure reporting. The setting of the application date is consistent with the PID and conditioned loops are accurately reported.

C. Analysis

Liberty's review of the application date and conditioned loop changes consisted of reviewing Qwest's responses to Liberty's data requests, interviews with Qwest's regulatory reporting and programming personnel, review of revised SAS code used to implement the changes, and analysis of data files containing records for the month of April 2002.

In reviewing the SAS code, Liberty brought two matters to Qwest's attention that may be improvements but are not necessary to correct problems. Liberty found one part of the RSOR code that may over-specify the unbundled loop orders subject to the 7 PM cutoff time. As written it correctly identifies these orders, but Liberty suggested that Qwest review the code to ensure that only necessary requirements were placed on the identification of these orders. Liberty also noted that Qwest's code may not function properly if two holidays were next to each other. This is not a current or likely problem.

In its review of the data files, Liberty replicated Qwest's reported results for conditioned loops for April in the Qwest region, and in the states of Colorado and Washington.

Liberty noted that both of these changes made Qwest's programming for collecting and processing data for reporting OP measures even more complex. New data sources, new fields, and new logic were added. Liberty did not find any errors or unintended interactions between the new and existing programming. However, Qwest should continue to monitor results and other clues for programming problems.

D. Findings and Conclusions

1. Performance Measure Release Date

Liberty completed its audit of the application data and conditioned loop changes on June 7, 2002.

2. Exceptions and Observations

No exceptions or observations have been raised with respect to this audit.

3. Conclusions

The changes discussed above have been properly implemented by Qwest.

4. Recommendations

Liberty has no specific recommendation related to the scope of this audit. However, Liberty notes that the programming required to implement theses changes, as was the cased for the changes reflecting customer due date changes, made performance measure reporting more complex. Therefore, Qwest should continue to monitor and tests its results for problems that may become apparent in the future.

In some cases, diagnostic measurements cannot really be used against any standard. They can't be designed to do that.

For example, presently the measurement called PO-15 is in that category, where it addresses due date changes per order.

It was originally established to evaluate PO-5 or to at least be helpful in looking at firm order confirmations provided on time, which is PO-5.

So PO-15, however, is by its nature, the parties, after extensive discussion in the ROC collaborative, were not able to determine, No. 1, that it should get a benchmark and, No. 2, if it could, what would it be.

So PO-15 is an example of one where you can't look at absolute levels. Even though we reported with a parity-type comparison, that comparison was diagnostic because you can't really draw a conclusion from it.

What you can do with it is look at the trend and say, "Well, our due date changes per order, are they increasing or decreasing and does that cause anyone concern?"

Lately, by the way they, have been decreasing.

Q. If you can look at Page 69 of the May results and Page 70 of the June results having to do with due date changes.

A. Which page again, please?

Q. Page 69 of May and 70 of June.

A. (Witness refers to document.) Okay.

Q. And due date changes have to do with how many times Qwest changes a due date for a customer, correct?

A. Yes.

Q. Now, if you look at these results for either

month, the results show that CLECs are experiencing statistically significantly worse treatment in all 12 months, correct?

A. No, you cannot conclude that.

The problematic word is the word "worse." You can say that the difference is statistically significant.

But this measurement, as I explained in my presentation, has kind of a built-in recognition that everybody recognizes, that you cannot make a valid direct comparison.

The numbers are provided because it's part of a template and it's there so you can say, "Yes, that difference is significant."

But what it means, whether that's good or bad in this case, the measurement is not defined sufficiently to allow you to do that.

And the parties recognized that and that's why they called it Diagnostic.

Q. Let's look at the actual numbers then, Mr. Williams.

This is not a case where we have low volumes on either the retail or the CLEC side, is it?

A. I'm sorry, I was coughing right in the middle of that. I'm sorry, but would you say that again?

Q. This is not a case where we have low volumes particularly for either the CLECs or the retail customers, correct?

A. Correct, this is a lot of volume.

Q. If you are not comfortable with the modified Z Score, if we look at either the chart or the actual numbers themselves, CLECs are experiencing more due date changes per order than Qwest's retail customers in every single month of the last 12 months, correct?

A. I have trouble saying that just because the orders measured -- which are a composite of all the products, are a composite of order types that go way beyond what the other measurements in terms of order types, but particularly product aggregation -- the relative distribution of the different products and what has what effect, I don't know I can say that the number of this reports -- yes, they are different.

It appears that there are more due date changes per order.

But the thing that's missing is the alignment and the apples-and-oranges-type correction that would have to be made in order for this measurement to be given appropriately a parity standard.

That apples-to-oranges kind of a

definitional adjustment has not been made. Nobody could figure out how to suggest that it be made.

What that means is that there would exist an offsetting factor theoretically that could push the CLEC absolute levels on the better side of the retail. It could.

The only thing you can derive from this is trends. The absolute levels is impossible without a great deal of additional analysis to try to say that one is better than the other.

All you can do is look at trends.

Q. Let's step back and simplify it. This PID, PO-15 measures number of due date changes per order, correct?

A. Right.

Q. That's the only PID that Qwest has that measures number of due date changes per order, correct?

A. It's the only one that measures that. We have others that are affected by those things.

For example, OP-4, if Qwest is changing due dates on a customer, that's meaning -- in an adverse way, it's meaning they are getting longer intervals and OP-4 will capture that.

Q. And Qwest agreed to the way PO-15 was defined

and put together.

Isn't that true?

A. All the parties did.

Q. So if I look at this measure, which is all I have in front of me for New Mexico-specific data, this shows that in all 12 of the last months CLECs per experiencing more due date changes per order than were Qwest customers, correct?

A. No. The numbers are more, but that does not mean that's what they were experiencing.

It might be. It might not. The measure cannot say that. It can only give you the trend.

It can say, for example, that the CLEC numbers have been going down since November with a slight up turn in the last three months of the May report.

Whereas, CLEC numbers have been going down at a slightly less rate of decrease.

That would imply to me that the trends are closing, which is a good thing reflecting our due dates.

But that's the only thing you can really observe from this.

We are not relying on this because it's diagnostic.

Q. In fact, you said in your Direct Testimony this morning that these numbers are decreasing.

Actually, in the last four months of data looking at the June data, they have increased every month for CLECs, correct?

A. In the hundredth decimal point place, yes, .09, .10, .11, just slight increases.

Q. If I look at the results for the 12 months, CLEC number of due date changes per order may be 2, 3 or 4 times higher than that shown here for Qwest customers, correct?

A. I don't follow that, I guess.

Q. Well, let's take April. .3 versus .11, almost four times higher, correct?

A. Oh, .03 on the Qwest results?

Q. Yes.

A. Versus .11?

Q. Yes.

A. Again, I'll reiterate you can't compare these absolute numbers with any validity. It's more of apples and oranges.

Q. You will agree with that me that what the April results show is almost 4 times more than the number of due date changes per order for CLECs than Qwest, correct?

A. The numbers -- .11 is more than four times or it's about 4 times the size of .03.

Q. PO-15, do you recall -- and you might want to look at your data. I'm going to use the May 16th report that includes the April data.

If you look at PO-15, do you recall Ms. Tribby's questions that CLECs are experiencing much higher rates of order changes, that general line of questioning?

A. Yes.

Q. To the extent that Qwest's bulk of orders are POTS-based and a CLEC has a significant volume of design services like an unbundled loop, how does that factor into PO-15?

A. That's a per**fect** example of what I was trying to get after as to the product. This measurement aggregates all the products.

So if the retail side -- not surprisingly -- had a lot of POTS orders, then you wouldn't expect as many due date changes on that side.

On the wholesale side, if you have that product mix that's such that they would have a higher mix of products that would experience due date changes because their exposure to such factors is greater, then you would say it **(that the product mix would, of itself, affect the PO-15 result)**.

That's why this measure is diagnostic.

Q. Let me then ask you another question in that

same line.

Let's assume that Qwest makes a decision to move a due date forward, to actually advance a due date and give the CLEC something early.

Does it included in PO-15?

A. Yes, it would be.

Q. Why don't you turn to Page 110 of that May 16 report for two-wire non-loaded loops?

A. (Witness complies.)

Q. Look at measure OP-4.

A. (Witness complies.) Okay.

Q. Do you know what the standard interval for provisioning a two-wire non-loaded loop is?

A. They vary.

Q. Let me ask it a different way.

What is the lowest standard interval for a two-wire non-loaded loop?

A. I think it's five days, if I remember correctly. There's been some changes lately but I think that's still true.

Q. In the last five months, what are the average range of results for the average interval for two-wire non-loaded loops?

A. From January forward, for example, 3.3 days, 3.9, 3.5, 3.6 days.

Q. What are the volumes?

A. 18 to 28 orders.

Q. So to the extent that Qwest is consistently moving due dates forward to the benefit of CLECs and their customers, that would show up in PO-15?

A. Yes.

Due Date Change Analysis

DD Change Reason	Completed On or Before Original Due Date
Street Address Correction	13
Resend Order to Downstream Group	2
Remove/Add/Change CKL/CKLT on Multi-Point	4
Release Held Order	0
Multiple Reasons - Company	0
Miscellaneous/Other	0
Improper Critical Dates	5
Facilities Not Available - Network	0
Correct LSO/FSO	1
Correct Critical Dates	1
Correct Circuit ID	10
Change DD - Customer	25
Correct CFA	0
Undetermined	112
Service Order Error	0
Order Re-issued - Company Reasons	0
Network - no C.O. support	0
Network - late drop	0
Held Order	1
DD Extended to Meet 3 Day Interval	0
Customer Not Ready	0
Correct Out of Service Error	1
CLEC OK'd early turn-up	204
Loop Extension Technology - Customer	0
Change DD to next business day - Company	0
Change DD to meet SIG Guidelines	0
Customer Requirements Changed	0
Delayed Due to Related Order	0
No Access	0
Facility Problem	0
Orders Completed on Due Date	23
Sub-total	**402**

Other Scenarios

Orders Not Found	9
Orders Still Pending	2
Orders Cancelled	16
Sub-total	**27**

Grand Total All Orders	**684**

Completed After Original Due Date

9
12
7
1
0
0
3
4
0
3
0
93
2
35
2
1
2
2
53
1
14
0
0
1
1
2
2
3
1
1
0
255

Reply Exhibit CLD-12

R. Hance Haney
Executive Director – Federal Regulatory

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202 429 3125
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rides the light
Qwest.

July 12, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: *Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota*, Docket No. 02-148

Dear Ms. Dortch:

In response to a request from the staff of the Department of Justice for information regarding line sharing SOCs, Qwest hereby submits the material that was provided.

The twenty-page limit does not apply as set forth in DA 02-1390.

Sincerely,

Hance Haney

cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
K. Brown

Qwest Communications International Inc.
July 12, 2002

Line Sharing SOCs

- Qwest initiated an analysis of its maintenance and repair performance for line sharing. This analysis led to the creation of a new job aid, which is a checklist for the central office technician to fill out for each line sharing order to ensure that installation guidelines, including electrical continuity testing, are consistently followed. A copy of this job aid is attached.

- In addition, Qwest issued a management directive that all line sharing orders should be loaded early in the day, to allow completion by 4:00 p.m. local time. Any line sharing order not completed by 4:00 p.m. local time is placed in a jeopardy status. Steps are then taken in the Loop Provisioning Center to ensure that both the N order for billing and the C order for the line sharing are jeopardied. A report is generated on a daily basis identifying the line sharing orders that have been jeopardied to allow monitoring of process compliance.

- These changes will address CLEC concerns regarding erroneous SOCs for line sharing orders. Qwest expects that its line sharing maintenance and repair performance will improve as well.

Qwest

CENTRAL OFFICE (CO)
JOB AID

TITLE:		DOCUMENT NO. / Rev.
LINE SHARING CHECKLIST		*CO-CL-05-0001 / Rev. 3*
ASSOCIATED PROCESS:		
EFFECTIVE DATE:	**REVISION DATE:**	
07/08/2002	*07/01/2001*	
AUTHORED BY:		
Name:	***CUID:***	E*Media
Mike Lanoue	mlanoue	***File Name (author only):***
Charlotte Griffiths (E*Media only)	csgrif2	***5_1_Line_Sharing_Checklist_all_n***

Audience:
- *Central Office (CO)*

Approved by: Mike Lanoue – Lead Process Analyst, CO Staff (07/01/02)

Revision 2: Reissued 01/16/02 to add Header, Footer, Page numbers, Author information, Title updates, and Unique Number Identification for the E*Media conversion.

Revision 3: Reissued 07/01/02 to add a NOTATION column to be used by CO Personnel for Service Order work step status and to modify the Purpose statement.

1.0 Purpose The purpose of this Job Aid is to identify the steps that need to be performed when working a Line Sharing Provisioning order from the Frame Order Management System (FOMS) document in the CO. A copy of this form is to be attached to each Line Sharing service order with a status posted in the Notation column for each work step.

STEP	OPERATION	DETAILS	NOTATIONS
1	Analyze FOMS Order Document	Print the FOMS order document and identify: 1. Line Sharing circuit 2. Copper facility. 3. Line Sharing equipment 4. Qwest service circuit elements. 5. Commitment date and time.	
2	Perform Facility qualification test	Using an H88 or equivalent test * set check line for load coils. If load coils are detected, the CO personnel will place an A9 JEP code against the order and wait for resolution notification.	
3	Pre-Wire Line Sharing circuit	Place frame cross connections for circuit: - Loop jumpers at Qwest OE and Facility.	
4	Check Qwest line.	Draw dial tone at facility and ANI*. - If incorrect assignment, verify termination and refer any problems to assignment. - If line is busy, place order wiring on hold and recheck every ½ hour until line is idle.	
5	Cut line splitter into circuit.	Lift facility jumper and terminate new jumper from line splitter. Lift jumper at OE and terminate jumper to line splitter. ANI Qwest circuit at the facility* - If ANI / Dial tone test fails, trouble shoot frame wiring and or line splitter circuit trouble. After ANI/Dial Tone test has passed perform an electrical continuity test on the data side of the splitter from the protector to the DEMARC 410 Block terminal utilizing an LSVT test set. If splitter problems are discovered jumper around the splitter and place the order in jeopardy using the following jeopardy codes: • A8 (splitter not connected on the DLEC side) • A7 (splitter not stenciled correctly) • A6 (Qwest wiring or inventory issue)	
6	Complete the FOMS order	Perform an SCM transaction on the FOMS order to complete CO provisioning steps.	

* Tests are pass/fail and do not require a test duration.

Acronyms provided in the back of the Wholesale Product Support book (CO-CL-10-0001).

Qwest

CENTRAL OFFICE (CO)
JOB AID

TITLE:		DOCUMENT NO. / Rev.
LINE SHARING PROVISIONING		*CO-CL-05-0002 / Rev. 3*
ASSOCIATED PROCESS:		
EFFECTIVE DATE:	**REVISION DATE:**	
07/15/2002	*07/09/02/2002*	
AUTHORED BY:		
Name:	***CUID:***	E*Media
Mike Lanoue	mlanoue	***File Name.(author only):***
Charlotte Griffiths (E*Media only)	csgrif2	***5_2_Line_Sharing_Provisioning_all_n***

Audience:
- *Central Office (CO)*

Approved by: Charlotte Griffiths – Lead Process Analyst, CO Staff (12/14/01)

Revision 2: Reissued 01/16/2002 to add Header, Footer, Page numbers, Author information, Title updates, Unique Number Identification for the E*Media conversion, and change Co-Provider to CLEC.

Revision 3: Reissued 07/09/2002 to add the service order completion time of no later than 4:00 pm local time

---

1.0 Purpose

The purpose of this Job Aid is to define the Line Sharing product and to establish the steps that need to be performed when working a Line Sharing Provisioning order from the Frame Order Management System (FOMS) document in the CO.

PRODUCT DEFINITION:

Shared Loop (Line Sharing) is defined as making available the opportunity for the CLEC to offer ADSL qualified advanced data services within the spectrum of an existing Qwest end user's analog voice-grade service. CLEC will use the data portion of the loop while Qwest will maintain the voice portion of the loop. In addition:

- CLEC may provide the splitter from a pre-determined list. The splitter is provisioned and maintained by Qwest (similar to Virtual Collocation).

- The end-user has dial tone originating from a Qwest switch.
- The handoff of the voice happens inside the Qwest CO. The DLEC demarc point is the data output from the POTS Splitter.
- A CLEC gains access to this service at the Qwest wire center through established Collocation arrangements.
- The combined data and voice service must comply with the standard T1.E1.4 when accepted by the industry as well as Qwest's technical requirements. More detailed specifications can be found in Qwest's technical publication *# 77384.*

This POTS service is installed using a basic "lift and lay" procedure. Prior to 4:00 pm (local time) on the service order Due Date, Qwest Central Office Personnel "lift" the loop from its current termination and "lays" it on a new termination (POTS Splitter) connecting to the CLEC's equipment In addition:

1. The CO will print the FOMS order and identify
    a. The Line Sharing circuit
    b. The copper facility
    c. The Line Sharing equipment
    d. The Qwest service circuit element
    e. The commitment date and time

2. CO personnel will perform a load coil detection test utilizing an H88 or equivalent test set.

3. If a load coil is detected the CO personnel will place the order in jeopardy using the A9 jep code and wait for resolution notification

4. If the load coil detection test is negative CO personnel will pre-wire the Line Sharing circuit by placing the frame cross connects and looping the jumpers at the Qwest OE and facility.

5. The CO will draw dial tone at facility and ANI.
    a. If assignment is incorrect, verify termination and refer any problems to assignment
    b. If line is busy, place wiring on hold and recheck every ½ hour until line is idle.

6) The CO will perform the following work steps:
    a. Lift facility jumper and terminate the new jumper from the line splitter
    b. Lift the jumper at the OE and terminate the new jumper from the line splitter
    c. ANI Qwest circuit at the facility. If ANI/Dial Tone test fails, trouble shoot frame wiring and or line splitter circuit trouble. After ANI/Dial Tone test has passed perform electrical continuity test utilizing the LSVT Test Set. Check for continuity from the protector to the DEMARC 410 Block terminal. The 410 Block location and terminal information is noted on the Data Line Splitter 89 Block that the cross connects were terminated on in step #4. If continuity problems are discovered it is the responsibility of the CO to resolve the problem and complete the order by the Due Date. If splitter problems are discovered jumper around the splitter and place the order in jeopardy using the following jeopardy codes:

A8	splitter not connected on the DLEC side
A7	splitter not stenciled correctly
A6	Qwest wiring or inventory issue

7) When the order has been completely wired and tested the CO will "SCM" the order in Switch/FOMS to complete the CO provisioning steps.

Definition of ME (miscellaneous equipment) for splitter assignment in Switch/FOMS is:

vce	voice side of port
vda	data side of port
010122	floor and relay rack
33	bay
02	shelf
005	port

Delimiters of periods will separate all elements with the exception of shelf and port id, a dash will separate these last two elements.
vce.010122.33.02-005, vda.010122.33.02-005
The frame and frame coordinates will be noted as a permanent remark such as:
F03 1G1H
F03 designates the frame, 1G is the vertical and horizontal frame location of the voice connection and 1H is the vertical and horizontal frame location of the data connection.

The ME definition applies to splitters located outside the cage (Virtual Co-location).
The definition described below applies to splitters located inside the cage (Physical Co-location).

Definition of ME (miscellaneous equipment) for splitter assignment in Switch/FOMS is:

vce.alt01.1	vda.alt01.1
vce	voice side of port
vda	data side of port
alt01	cable name
1	cable count

The frame and frame coordinates will be noted as a permanent remark such as:
FO3 B10 C11
F03 designates the frame, B10 is the vertical and horizontal frame location of the voice connection and C11 is the vertical and horizontal location of the voice/data connection.
The frame blocks will be labeled VOICE AND VOICE/DATA.

NOTE: It is extremely important that the OE is connected to the Voice side of the Splitter and that the facility is connected to the Voice/Data side of the Splitter. If these cross connect terminations are reversed dial tone will still be detected at the protector but data will not be passed. Utilizing the LSVT test set will detect reversals.

NightFire
Igniting the Bandwidth Explosion™

Jeff Thompson
Director, Wholesale IT
Qwest Communications
1005 17th Street
Denver, CO 80202

Date: June 27th, 2002

Re: IMA testing at Qwest

Mr. Thompson:

This letter confirms that NightFire Software has successfully tested in Qwest's Stand Alone Test Environment (SATE) and production systems on behalf of at least 5 Competitive Local Exchange Carriers (CLECs). NightFire has used SATE to test numerous pre-order and order transactions and have found that when a product is supported in SATE as well as in production, SATE mirrors the production environment. SATE has improved NightFire's ability to automate and manage EDI interfaces into Qwest. These interfaces connect Qwest to its CLEC trading partners and allow CLECs to have fully automated interfaces requiring little to no manual intervention.

Utilizing Qwest's SATE environment, NightFire has tested the last two major IMA releases (IMA 8.0 and 9.0) and will continue using it for future IMA releases to facilitate the testing of any new product, protocol, and business rule changes. NightFire has tested the following Qwest products in SATE:

- Resale POTS
- Unbundled Loop
- Number Portability
- Loop with Number Portability
- Directory Listings Only (Resale)
- Unbundled Distribution Loop (Sub-loop)
- Sub-loop with Number Portability
- Line Sharing
- UNE-P POTS

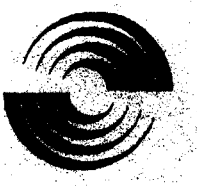
The SATE environment has allowed NightFire to test IMA releases and verify the functionality of the Qwest interface and NightFire's software prior to taking mutual customer's into production. NightFire has worked very closely with Qwest over the past year to define and improve the functionality of the SATE environment so that the needs of CLECs and vendors like NightFire are met. NightFire Software has provided a variety of CLEC customers and other Communication Service Providers with national LSR interfaces since 1998.

We hope this information is helpful. NightFire would be willing to discuss this information in more detail with the FCC, as needed.

Respectfully,

V.V. Swaminathan

Venkates Swaminathan
Founder, Executive Vice President, and Chief Strategist



NEW ACCESS
WWW.NEWACCESS.CC
The Smart Choice for Local and Long Distance Service

Jeff Thompson
Qwest
Director - Wholesale IT
1005 17th Street, 10th Floor
Denver, CO 80202

Mr. Thompson,

This letter is to confirm that New Access is currently using IMA EDI 9.0 Pre-Order response information to populate IMA EDI Order transactions.

However, New Access currently extracts IMA EDI Pre-Order information from IMA EDI transactions and stores it in a SQL database. IMA EDI Orders are then successfully populated with the information from the SQL database without undergoing any conversions or modifications.

Regards,
David Lueck
New Access

P.O. BOX 52088
MINNEAPOLIS, MN 55402-2088 PHONE: 877 330 4937 FAX: 612 321 9207 INFO@NEWACCESS.CC

Reply Exhibit LN-16
Redacted – For Public Inspection

New Access EDI Order Volumes – June 2002

STATE	Number LSRs Submitted
COLORADO	[redacted]
IOWA	
NEBRASKA	
NORTH DAKOTA	

HOGAN & HARTSON
L.L.P.

July 25, 2002

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
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WWW.HHLAW.COM

: Parte – REDACTED – FOR PUBLIC INSPECTION

' HAND DELIVERY

arlene H. Dortch
cretary
deral Communications Commission
5-12th Street, S.W., TW-B204
ashington, D.C. 20554

Re: Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota, Docket No. 02-148

ar Ms. Dortch:

In response to questions from Commission staff, Qwest is providing ormation regarding its offering of pre-order to order integration capabilities. ecifically, Qwest is providing evidence from New Access, a CLEC with operations Colorado, Iowa, Nebraska and North Dakota, that it is using Qwest's IMA-EDI to egrate pre-order and order transactions as of June 2002, along with the sociated order volumes. Qwest also is providing further information relating to e integration capability it offers CLECs through IMA-EDI, including cumentation and support, the parsing of pre-order information, and a description how Qwest uses the same parsed information in the IMA-GUI. This material is reby submitted for inclusion in the record for the above-referenced proceeding.

The twenty-page limits do not apply as set forth in DA 02-1390.

Sincerely,

Sumeet Seam

closures

M. Carowitz
M. Engel
R. Tanner
E. Yockus
G. Remondino
M. Cohen
J. Prisbey
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith

NEW ACCESS
WWW.NEWACCESS.CC
The Smart Choice for Local and Long Distance Service

Jeff Thompson
Qwest
Director - Wholesale IT
1005 17th Street, 10th Floor
Denver, CO 80202

Mr. Thompson,

This letter is to confirm that New Access is currently using IMA EDI 9.0 Pre-Order response information to populate IMA EDI Order transactions.

However, New Access currently extracts IMA EDI Pre-Order information from IMA EDI transactions and stores it in a SQL database. IMA EDI Orders are then successfully populated with the information from the SQL database without undergoing any conversions or modifications.

Regards,
David Lueck
New Access

P.O. BOX 52088
MINNEAPOLIS, MN 55402-2088 PHONE: 877 330 4937 FAX: 612 321 9207 INFO@NEWACCESS.CC

Number of LSRs Submitted by New Access via IMA-EDI 9.0 in June 2002

REDACTED-FOR PUBLIC INSPECTION

EDI – PRE-ORDER/ORDER INTEGRATION

Qwest provides CLECs with the necessary documentation and support to enable CLECs and/or their software providers to successfully accomplish Pre-order to Order Integration. This allows CLECs to take data returned in the Pre-Order transaction and electronically populate the LSR. For example, Qwest provides parsed data for address validation and CSRs among other transactions.

Qwest provides to EDI CLECs the Developer Worksheets as an appendix to the Disclosure Document.[1] Specifically, Developer Worksheets specify field lengths, field characteristics, and any conditions related to the usage of specific fields for specified products. The same Developer Worksheets provided to the EDI CLECs have been used by Qwest's IMA Development, System Test and Regression Test teams to develop, test and implement IMA in its first implementation on January 1, 1997 and have continued to be used for enhancements to IMA since then. Additionally, Qwest provides technical assistance to the CLECs through its technical implementation teams that work with CLECs on all aspects of the EDI certification process. They are available to support the CLECs at whatever level of detailed support they need. This is equivalent to the support that the Qwest technical implementation team provides to the internal Qwest IMA developers.

Qwest's IMA system is based on LSOG5 guidelines for pre-order and order transactions, including the rules for parsing information on pre-order transactions. This allows for consistency and reduced complexity of integration as further described below. When the OBF guidelines were developed and published, the forum was careful

to ensure consistency in the naming of pre-order and order fields. The forum also worked to ensure that pre-order transactions defined and parsed pre-order information to the extent that this pre-order data was required on an order. OBF did not publish a document to describe how to map between pre-order and order information due to a belief that the care taken in defining and naming the fields in the pre-order and order transactions consistently ensures that the integration process is readily comprehensible for CLECs. For example, if the LSR required the population of an address field called Street Address Number (SANO), then the preorder address validation transaction requires the parsing and returning of the same field, SANO, so it can be readily identified and populated on the LSR.

In addition to following the OBF guidelines, as Qwest implemented pre-order and order transactions, Qwest undertook its own evaluation of any necessary Qwest-specific deviations from the LSOG guidelines that were required due to Qwest legacy systems. In that evaluation, Qwest ensured the same criteria for integration between pre-order and order were met. For example, if there is a Qwest-specific field constraint on the order form and that specific field is available in a pre-order transaction, that field is parsed in the pre-order transaction, in such a way that it can be readily used by the CLEC on the order. For example, if the billing name field in the OBF guidelines is 50 characters long, but Qwest's legacy systems limit the billing name to 30 characters, Qwest limited the billing name to 30 characters in order to ensure that the information can be processed through its legacy systems and provides documentation accordingly.

Qwest has integrated preorder and order information using the same set of technical documentation that CLECs use to build an EDI interface. Qwest has achieved

[1] http://www.qwest.com/wholesale/ima/edi/document.html.

this integration in the IMA-GUI interface. This integration includes electronically transferring information from preorder responses into subsequent preorder transaction requests and transferring information from preorder responses onto orders. Parsed CSR is an example of the integration achieved between preorder and order information.

That Qwest used the same technical documentation is key because integration is achieved at the data field level. For example, a preorder field that contains a two-digit numeric value can be electronically transferred to the corresponding order field with the same two-digit numeric requirement. The consistency of the preorder and order fields permits integration. The technology that is employed to accomplish integration is not the critical element. The IMA-GUI and EDI technologies are two possible technologies to accomplish integration. Therefore, Qwest's achieving integration in the IMA-GUI using the same technical documentation as that provided to EDI CLECs demonstrates that CLECs can integrate preorder and order in their EDI interfaces should they choose to do so. Since Qwest has achieved preorder to order integration using Developer Worksheets. CLECs can also achieve preorder to order integration using Developer Worksheets.

The attached table summarizes the Pre-Order to Order Integration that Qwest has implemented in the IMA GUI. For each data element that can be integrated, the field name and field number is provided, as well as the Pre-Order transaction the data may be obtained from. Additionally, the frequency of use of each data element is provided based on the usage codes and business rules surrounding each of the data elements.

Form	Data Element (Field Name)	Field Number (10.0 Developer Worksheets)	Pre-Order function field is auto-populated from	Frequency of Use
LSR	PON	2	Appointment, TN Availability	Required for all Product/Activity Combinations
LSR	AN	7	CSR	Required for most Product/Activity Combinations
LSR	DDD	14	Appointment	Required for all Product/Activity Combinations
LSR	APPTIME	15	Appointment	Required if Appointment was Reserved in Pre-Order
LSR	APTCON	15a	Appointment	Required if Appointment was Reserved in Pre-Order
LSR	AGAUTH	35	CSR	Conditional based on Product/Activity Combination
LSR	DATED	36	CSR	Required only if AGAUTH=Y
LSR	AUTHNM	37	CSR	Required only if the end user name changes at the time of conversion
EU	AN	3	CSR	Field not used (only required on LSR Form)
EU	NAME	8	CSR	Required for all Product/Activity Combinations
EU	SAPR	10	Address Validation	Required if part of validated address
EU	SANO	11	Address Validation	Required if part of validated address
EU	SASF	12	Address Validation	Required if part of validated address
EU	SASD	13	Address Validation	Required if part of validated address
EU	SASN	14	Address Validation	Required if part of validated address
EU	SATH	15	Address Validation	Required if part of validated address
EU	SASS	16	Address Validation	Required if part of validated address
EU	LD1	17	Address Validation	Required if part of validated address
EU	LV1	18	Address Validation	Required if part of validated address
EU	LD2	19	Address Validation	Required if part of validated address
EU	LV2	20	Address Validation	Required if part of validated address
EU	LD3	21	Address Validation	Required if part of validated address
EU	LV3	22	Address Validation	Required if part of validated address
EU	AHN	23a	Address Validation	Required if part of validated address
EU	ROUTE	23b	Address Validation	Required if part of validated address
EU	BOX	23c	Address Validation	Required if part of validated address
EU	CITY	24	Address Validation	Required if part of validated address
EU	STATE	25	Address Validation	Required if part of validated address
EU	ZIP	26	Address Validation	Required if part of validated address
EU	CALA	26a	Address Validation	Required if part of validated address
RS	AN	3	CSR	Field not used (only required on LSR Form)
RS	TNS	15	Reserve Telehone Numbers	Conditional based on Product/Activity Combination
RPL	AN	3	CSR	Field not used (only required on LSR Form)
RPL	SAPR	12	Address Validation	Required if part of validated address
RPL	SANO	13	Address Validation	Required if part of validated address
RPL	SASF	14	Address Validation	Required if part of validated address
RPL	SASD	15	Address Validation	Required if part of validated address
RPL	SASN	16	Address Validation	Required if part of validated address
RPL	SATH	17	Address Validation	Required if part of validated address
RPL	SASS	18	Address Validation	Required if part of validated address
RPL	LD1	19	Address Validation	Required if part of validated address
RPL	LV1	20	Address Validation	Required if part of validated address
RPL	LD2	21	Address Validation	Required if part of validated address
RPL	LV2	22	Address Validation	Required if part of validated address
RPL	LD3	23	Address Validation	Required if part of validated address
RPL	LV3	24	Address Validation	Required if part of validated address
RPL	RLSO	26	Address Validation	Required if part of validated address
RPL	AHN	26a	Address Validation	Required if part of validated address
RPL	ROUTE	26b	Address Validation	Required if part of validated address
RPL	BOX	26c	Address Validation	Required if part of validated address
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RPL	CALA	29a	Address Validation	Required if part of validated address
RPL	SAPR	46	Address Validation	Required if part of validated address
RPL	SANO	47	Address Validation	Required if part of validated address
RPL	SASF	48	Address Validation	Required if part of validated address
RPL	SASD	49	Address Validation	Required if part of validated address
RPL	SASN	50	Address Validation	Required if part of validated address
RPL	SATH	51	Address Validation	Required if part of validated address

RPL	SASS	52	Address Validation	Required if part of validated address
RPL	LD1	53	Address Validation	Required if part of validated address
RPL	LV1	54	Address Validation	Required if part of validated address
RPL	LD2	55	Address Validation	Required if part of validated address
RPL	LV2	56	Address Validation	Required if part of validated address
RPL	LD3	57	Address Validation	Required if part of validated address
RPL	LV3	58	Address Validation	Required if part of validated address
RPL	RLSO	60	Address Validation	Required if part of validated address
RPL	AHN	60a	Address Validation	Required if part of validated address
RPL	ROUTE	60b	Address Validation	Required if part of validated address
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LS	AN	3	CSR	Field not used (only required on LSR Form)
CRS	AN	6	CSR	Field not used (only required on LSR Form)
NP	AN	3	CSR	Field not used (only required on LSR Form)
DRS	AN	3	CSR	Field not used (only required on LSR Form)
RFR	AN	3	CSR	Field not used (only required on LSR Form)
LSNP	CFA	18	CFA Validation	Required for all Loop/Num Port Orders
PS	CFA	46	CFA Validation	Conditional based on Product/Activity Combination

CLEC Reject Rates

[redacted]

CLEC	New Access	AT&T	Z-Tel
[redacted]			

* Each timeframe is for the most recent period of the specified amount of time.

** Each LSR may have multiple reject messages.

*** Percentage of rejected LSRs does not include the same exclusions or disaggregations as used in PO-4B.

HOGAN & HARTSON
L.L.P.

July 29, 2002

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910

Ex Parte – REDACTED – FOR PUBLIC INSPECTION

BY HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445-12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: Application of Qwest Communications International, Inc. To Provide In-Region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota, Docket No. 02-148

Dear Ms. Dortch:

In response to questions from Commission staff, Qwest is providing information regarding its offering of pre-order to order integration capabilities. Specifically, Qwest is providing LSR rejection rates for New Access, a CLEC that performs integrated pre-order and order functions through IMA-EDI in Colorado, Iowa, Nebraska and North Dakota as of June 2002. Additionally, Qwest is providing LSR rejection rates for Hewlett-Packard Consulting, the pseudo-CLEC that performed integrated pre-order and order functions through IMA-EDI during the ROC OSS test. This material is hereby submitted for inclusion in the record for the above-referenced proceeding.

The twenty-page limits do not apply as set forth in DA 02-1390.

Sincerely,

Sumeet Seam

Enclosures

cc: M. Carowitz
M. Engel
R. Tanner
E. Yockus
G. Remondino
M. Cohen
J. Prisbey
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith

Actual commercial usage as well as independent third-party testing demonstrate that CLECs that have developed integrated interfaces can achieve low rates of rejected LSRs. New Access, a CLEC that operates in Colorado, Iowa, Nebraska and North Dakota, has affirmed that it performs pre-order/order integration through its IMA-EDI interface as of June 2002. *See* Qwest July 25 Ex Parte on Pre-order to Order Integration. **[REDADCTED – FOR PUBLIC INSPECTION]**

HP's findings during the ROC OSS test further confirm that achievement of successful integration through IMA-EDI is associated with a low rate of rejections. As indicated in the attached e-mail and tables, for the four months between January 2002 and April 2002, out of a total of 889 UNE-P retest orders that HP submitted via its integrated IMA-EDI interface, only 12.15% of these orders were rejected. Additionally, HP affirmed that the errors that caused those rejects were attributable to issues unrelated to pre-order to order integration. These data from New Access and HP demonstrate that Qwest's offering of parsing and integration capabilities have enabled them to submit a very high percentage of orders that are not rejected.

New Access Reject Rates (June 2002)

REDACTED-FOR PUBLIC INSPECTION

-----Original Message-----
From: Don Petry [mailto:dpetry@ix.netcom.com]
Sent: Friday, July 26, 2002 4:18 PM
To: ROC TAG Members
Cc: Geoff May
Subject: RE: Request for Information

Pursuant to Qwest's request to provide an analysis of the most recent 4 months of reject information for UNE-P LSRs in the ROC OSS PID re-test, HP provides the following summary and attached information.

Table 1 and Chart 1 represent the P-CLEC UNE-P PID re-test LSR activity via IMA EDI for the last four months of the ROC 271 test.

Table 1 and Chart 1 reflect the number of Original, Supplemental and FATAL reject transactions for the UNE-P Product.

Table 2 on the Error Analysis tab of the Excel spreadsheet shows the number of FATAL rejects by Category. Column C lists Examples of Error Messages received by the P-CLEC.

As described in the HP Final Report, HP integrated the address information from the pre-order transaction into the End User form. Issues not related to pre-order/order integration generated these 108 FATAL rejects.

Don Petry
770-861-9621

for

Geoff May
HP Services Consulting & Integration
978-376-3773

Table 1

Month	Original LSRs	Supplemental LSRs	Total LSRs		FATAL Reject	% of Transactions Rejected
Jan-02	545	12	557		81	14.54%
Feb-02	297	2	299		24	8.03%
Mar-02	1	0	1		0	0.00%
Apr-02	29	3	32		3	9.38%
Totals	872	17	889		108	12.15%

Chart 1

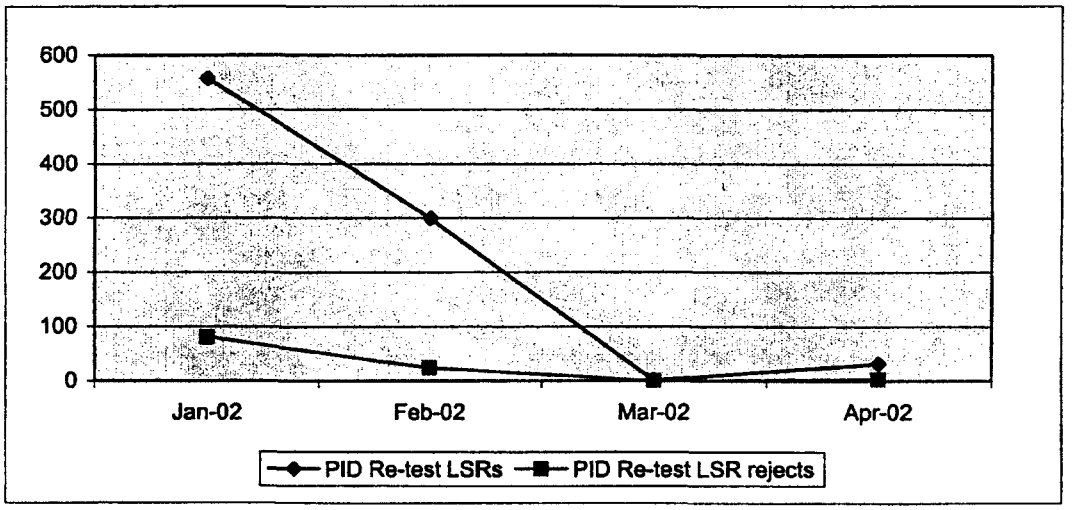

TABLE 2

Category	# of instances	Examples of Error messages
USOC issues	**24**	
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: OC1
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: 999AL
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: UXTA3
		RESALE Form:Service Details Section:Invalid USOCs - problems with Validity, Resellability, State or Contract: HSO
Data Entry/ Template Error	**47**	
		LSR Form:Admin Section:AN required when ACT is Z
		RESALE Form:Service Details Section 2:LNUM required when ACT is Z
		LSR Form:Admin Section:DDD cannot be earlier than current date
		LSR Form:Admin Section:LSO required when APTCON is not populated and LNA is N
		DSR Form:DL Form 1:Listing Control Section:DOI required when ACT is N
Data Mismatch &	**37**	
Test Bed issues		LSR Form:Admin Section:TOS does not match SCATEG on reserved TN
		Invalid NPA-NXX/State combination: 208-338/CO
		End User Name, TN, and/or address are inconsistent
		Could not find original Work Order ID for supplement
		(redacted) does not match PON used in Pre-order TN reservation (redacted) for TN redacted
Total	**108**	

Form	Data Element (Field Name)	Field Number (10.0 Developer Worksheets)	Pre-Order function field is auto-populated from	Frequency of Use
LSR	PON	2	Appointment, TN Availability	Required for all Product/Activity Combinations
LSR	AN	7	CSR	Required for most Product/Activity Combinations
LSR	DDD	14	Appointment	Required for all Product/Activity Combinations
LSR	APPTIME	15	Appointment	Required if Appointment was Reserved in Pre-Order
LSR	APTCON	15a	Appointment	Required if Appointment was Reserved in Pre-Order
LSR	AGAUTH	35	CSR	Conditional based on Product/Activity Combination
LSR	DATED	36	CSR	Required only if AGAUTH=Y
LSR	AUTHNM	37	CSR	Required only if the end user name changes at the time of conversion
EU	AN	3	CSR	Field not used (only required on LSR Form)
EU	NAME	8	CSR	Required for all Product/Activity Combinations
EU	SAPR	10	Address Validation	Required if part of validated address
EU	SANO	11	Address Validation	Required if part of validated address
EU	SASF	12	Address Validation	Required if part of validated address
EU	SASD	13	Address Validation	Required if part of validated address
EU	SASN	14	Address Validation	Required if part of validated address
EU	SATH	15	Address Validation	Required if part of validated address
EU	SASS	16	Address Validation	Required if part of validated address
EU	LD1	17	Address Validation	Required if part of validated address
EU	LV1	18	Address Validation	Required if part of validated address
EU	LD2	19	Address Validation	Required if part of validated address
EU	LV2	20	Address Validation	Required if part of validated address
EU	LD3	21	Address Validation	Required if part of validated address
EU	LV3	22	Address Validation	Required if part of validated address
EU	AHN	23a	Address Validation	Required if part of validated address
EU	ROUTE	23b	Address Validation	Required if part of validated address
EU	BOX	23c	Address Validation	Required if part of validated address
EU	CITY	24	Address Validation	Required if part of validated address
EU	STATE	25	Address Validation	Required if part of validated address
EU	ZIP	26	Address Validation	Required if part of validated address
EU	CALA	26a	Address Validation	Required if part of validated address
RS	AN	3	CSR	Field not used (only required on LSR Form)
RS	TNS	15	Reserve Telehone Numbers	Conditional based on Product/Activity Combination
RPL	AN	3	CSR	Field not used (only required on LSR Form)
RPL	SAPR	12	Address Validation	Required if part of validated address
RPL	SANO	13	Address Validation	Required if part of validated address
RPL	SASF	14	Address Validation	Required if part of validated address
RPL	SASD	15	Address Validation	Required if part of validated address
RPL	SASN	16	Address Validation	Required if part of validated address
RPL	SATH	17	Address Validation	Required if part of validated address
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DRS	AN	3	CSR	Field not used (only required on LSR Form)
RFR	AN	3	CSR	Field not used (only required on LSR Form)
LSNP	CFA	18	CFA Validation	Required for all Loop/Num Port Orders
PS	CFA	46	CFA Validation	Conditional based on Product/Activity Combination

Report Line Number	90

CR #	Title	Current Status / Date	Level of Effort	Interface Release #	Product Impacted
SCR061302-01	Migrate UNE-P Customers by TN	Pending Prioritization 7/18/02	: 1875 -	IMA Common	UNE-P

Originator: Hines, LeiLani

Originator Company Name: WorldCom

Director: Thompson, Jeff

Owner: Thompson, Jeff

CR PM: Routh, Mark

Description Of Change

Currently, Qwest is the only ILEC that requires CLECs to submit Customer Name and Service Address for migration orders (ACT= V,W,Z) to UNE-P. WorldCom is requesting that Qwest allow CLECs to migrate using Customer Name, Telephone Number, and SANO. And not required them to supply the Service Address on the ACT types.

Status History:

Date	Action	Description
6/13/02	CR Submitted	
6/14/02	CR Acknowledged	Sent acknowledgement to LeiLani Hines
6/25/02	Clarification Meeting Scheduled	
6/27/02	Clarification Meeting Held	See Project Meeting notes.
7/09/02	Status Changed	Status changed to Clarification
7/18/02	Discussed at Monthly CMP Meeting	SCR061302-01 discussed at July Systems CMP Monthly meeting; please see Systems CMP Distribution Package July CMP -- Attachment B

CLD 22

CR #	Title	Current Status Date	Level of Effort	Report Line N / Interface Release #	P
SCR060702-01	Migrating Customers using the Conversion As Specified Activity Type	Pending Prioritization 7/18/02	: 5675 -	IMA Common	U

Originator: Reith, Michael

Originator Company Name: Z-Tel

Director: Thompson, Jeff

Owner: Winston, Connie

CR PM: Esquibel-Reed, Peggy

Description Of Change

Z-Tel is requesting the ability to migrate customers as specified without having to list changes to the customer's current feature set. For example, when placing a customer migration order with Qwest, we are required to list the old line class of service with a feature activity code of 'change from', and list the new line class of service with an activity code of 'change to'. In addition, we must list all change and removes for all of the existing features on the account and adds for all of the new features that do not currently exist on the account. This practice is commonly referred to in the industry as a migrate as is with changes, not a migrate as specified. Z-Tel needs the ability to convert customers as we specify without having to list and map changes, adds or removes. SBC, Verizon, and BellSouth all provide this pure migrate as specified capability for UNE-P customers and we are asking Qwest to do the same.

REVISION: Z-Tel is requesting this change for Qwest Retail to UNE-P POTS, as well as, Resale to UNE-P POTS, UNE-P POTS to UNE-P POTS, and any other CLEC to CLEC UNE-P POTS migrations.

Status History:

Date	Action	Description
6/07/02	CR Submitted	
6/10/02	CR Acknowledged	

Report Line Number	48

CR #	Title	Current Status / Date	Level of Effort	Interface Release #	Product Impacted
SCR020802-1	Update CSRs within 24 hours	Pending Prioritization 7/09/02	: 8000 -	IMA Common	All

Originator: Spangler, Jonathan
Originator Company Name: AT&T
Director: Thompson, Jeff
Owner: Thompson, Jeff
CR PM: Esquibel-Reed, Peggy

Description Of Change

Currently Qwest updates CSRs within 3 to 5 business days, however, at times it can take up to 30 days to update a CSR. CLECs cannot send change orders until the CSRs are updated. Consequently, AT&T respectfully requests that Qwest update its CSRs within 24 hours.

Status History:

Date	Action	Description
2/08/02	CR Submitted	CR submitted at 3:27 p.m.; CR is eligible for presentation at March CMP meeting; per request from CLEC, CR will be brought forward at February CMP Meeting as a walk on
2/12/02	CR Acknowledged	CR Acknowledged at 8:45 a.m.
2/12/02	Clarification Meeting Scheduled	Clarification meeting scheduled for February 15, 2002.
2/15/02	Clarification Meeting Held	See Project Meetings for notes.
2/21/02	Status Changed	

2/21/02	Discussed at Monthly CMP Meeting	SCR020802-1 discussed during 'Walk On CR' portion of February Systems CMP Monthly meeting; Attachment D for February Distribution Package
3/13/02	Info Received From CLEC	Covad submitted an e-mail to Qwest indicating their interest in this Change Request
3/15/02	Info Received From CLEC	Eschelon submitted an e-mail to Qwest indicating their interest in this Change Request
3/21/02	Discussed at Monthly CMP Meeting	SCR020802-1 discussed March Systems CMP Monthly meeting; please see Systems CMP Distribution Package March CMP - Attachment B
3/29/02	Communicator Issued	CMPR.03.29.02.F.01244.Meeting_Proposal sent with proposed dates and times for meeting to discuss Qwest options.
4/02/02	Communicator Issued	CMPR.04.02.02.F.01249.CSC_CR_Meeting sent with scheduled date, time, and call in number for 'options' meeting.
4/09/02	CLEC Call	Call to discuss options held. See Project Meetings Section for meeting notes.
4/18/02	Discussed at Monthly CMP Meeting	SCR020802-1 discussed at April Systems CMP Monthly meeting; please see Systems CMP Distribution Package April CMP - Attachment G
4/18/02	Status Changed	Status Changed from Presented to Evaluation per April CMP Meeting.
5/16/02	Discussed at Monthly CMP Meeting	SCR020802-1 discussed at May Systems CMP Monthly meeting; please see Systems CMP Distribution Package May CMP - Attachment H
6/10/02	Record Update	Updated Impacted System to IMA Common (from Wholesale Billing)
6/20/02	Discussed at Monthly CMP Meeting	SCR020802-1 discussed at June Systems CMP Monthly meeting; please see Systems CMP Distribution Package June CMP -- Attachment I
6/25/02	Additional Information	Jonathan Spangler requested a conference call with Qwest, tomorrow if possible.
6/25/02	Additional Information	AT&T requested conference call scheduled for June 26, 2002.
6/25/02	Info Received From CLEC	Email received from Jonathan Spangler for tomorrow's conference call discussion. See Project Meetings section for details.

6/26/02	CLEC Call	Conference call held with AT&T, at the request of AT&T. See Project Meetings for notes.
6/27/02	Communicator Issued	CMPR.06.27.02.F.01285.Mtg_Proposal_CSR
7/01/02	Communicator Issued	CMPR.07.01.02.F.01288.CSR_Meeting
7/02/02	Communicator Issued	REVISED - CMPR.07.01.02.F.01288.CSR_Meeting (corrected SCR #)
7/12/02	Status Changed	Updated status to 'Pending Prioritization'
7/18/02	Discussed at Monthly CMP Meeting	SCR020802-1 discussed at July Systems CMP Monthly meeting; please see Systems CMP Distribution Package July CMP -- Attachment I

Action Items (AI) Associated with this CR:

AI Number 11 ***Date Initiated*** 7/15/02 ***Date Due*** 7/19/02 ***Date Complete***

Responsible Party Thompson, Jeff ***AI Status*** Open

Short Title Present revised response for SCR020802-1 (Update CSRs within 24 hours) at July CMP meeting

Description

Resolution

Project Meetings

June 26, 2002 Conference Call With AT&T:
AT&T Attendees: Jonathan Spangler, Tim Boykin, Carla Pardee
Qwest Attendees: Jeff Thompson, Michael Buck, Peggy Esquibel-Reed
Jonathan Spangler stated that he had discussions with his customer, AT&T Local Service Group, and gave them perspective on the Qwest options, specifically Option 3. It became clear that Option 3 was not a good option to move forward with as there are too many things not meeting the needs.
Jonathan stated that he sent an email (June 25th) as a response.
All on call indicated that they read the email.
Jonathan requested that the email be included in the CR documentation.
Jonathan asked if there was any other Qwest offer.
Jeff Thompson stated that he is not understanding the request. He thought that Qwest was working with AT&T to get to a

Summary of Field Coding Process Audit

State	Week	# of Observations	# Passed	% Passing
CO	1-Feb	575	546	95%
	8-Feb	596	590	99%
	15-Feb	637	624	98%
	22-Feb	706	692	98%
	1-Mar	1062	1020	96%
	8-Mar	548	521	95%
	22-Mar	414	397	96%
	29-Mar	387	360	93%
	5-Apr	543	532	98%
	12-Apr	475	461	97%
	19-Apr	627	614	98%
	26-Apr	578	561	97%
	3-May	529	518	98%
	10-May	428	424	99%
	17-May	556	545	98%
	24-May	661	648	98%
	31-May	511	510	98%
	7-Jun	431	422	98%
	14-Jun	449	440	98%
	21-Jun	481	471	98%
	28-Jun	481	471	98%
IA	1-Feb	153	151	99%
	8-Feb	171	167	98%
	15-Feb	161	148	92%
	22-Feb	132	129	98%
	1-Mar	161	158	98%
	8-Mar	146	143	98%
	22-Mar	122	121	99%
	29-Mar	137	134	98%
	5-Apr	N/A	N/A	N/A
	12-Apr	140	137	98%
	19-Apr	140	137	98%

	26-Apr	130	130	100%
	3-May	150	148	99%
	10-May	184	176	96%
	17-May	186	173	93%
	24-May	159	145	91%
	31-May	98	92	94%
	7-Jun	166	158	95%
	14-Jun	187	180	96%
	21-Jun	167	158	95%
	28-Jun	165	156	95%
ID	1-Feb	102	101	99%
	8-Feb	119	115	97%
	15-Feb	92	92	100%
	22-Feb	110	107	97%
	1-Mar	100	94	94%
	8-Mar	88	84	95%
	22-Mar	127	124	98%
	29-Mar	105	103	98%
	5-Apr	89	88	99%
	12-Apr	94	90	96%
	19-Apr	122	113	93%
	26-Apr	92	90	98%
	3-May	140	124	89%
	10-May	89	88	99%
	17-May	82	81	99%
	24-May	159	145	91%
	31-May	120	113	94%
	7-Jun	120	117	98%
	14-Jun	130	125	96%
	21-Jun	101	98	97%
	28-Jun	132	129	98%
ND	1-Feb	60	56	93%
	8-Feb	87	77	89%
	15-Feb	90	82	91%
	22-Feb	102	96	94%

	1-Mar	109	107	98%
	8-Mar	73	68	93%
	22-Mar	92	92	100%
	29-Mar	N/A	N/A	N/A
	5-Apr	87	85	98%
	12-Apr	97	86	89%
	19-Apr	87	80	92%
	26-Apr	113	107	95%
	3-May	179	175	98%
	10-May	233	227	97%
	17-May	189	184	97%
	24-May	259	247	95%
	31-May	229	220	96%
	7-Jun	266	256	96%
	14-Jun	237	224	95%
	21-Jun	385	369	96%
	28-Jun	196	189	96%
NE	1-Feb	112	111	99%
	8-Feb	110	108	99%
	15-Feb	66	66	100%
	22-Feb	55	52	95%
	1-Mar	57	55	96%
	8-Mar	58	54	93%
	22-Mar	120	114	95%
	29-Mar	120	115	96%
	5-Apr	N/A	N/A	N/A
	12-Apr	80	78	98%
	19-Apr	94	89	95%
	26-Apr	100	98	98%
	3-May	110	102	93%
	10-May	120	114	95%
	17-May	100	89	89%
	24-May	113	107	95%
	31-May	102	100	98%
	7-Jun	98	94	96%
	14-Jun	108	105	97%

[redacted]	21-Jun	85	80	94%
	28-Jun	100	92	92%

State: State in which the audit took place, i.e., Colorado, Iowa, Idaho, North Dakota, or Nebraska.

Week: Week during which the audit took place. These audits are done weekly in each state.

# of Observations: Number of observations or trouble tickets reviewed during the audit period. The local network management team does these observations. They review the trouble ticket to see if the disposition and cause code on the trouble report reflect the trouble reported and the work done to resolve the trouble. This is done by taking into account the trouble reported, results of tests done during trouble isolation and the narrative section where the technician explains what s/he did to resolve the trouble. If the disposition and cause codes match accordingly, then the observation is considered as passed. Disposition and Cause Codes identify the reason for service problems. Disposition Codes indicate the action taken to clear the reported trouble, while Cause Codes indicate why. For example: if the customer reports no dial tone - and the trouble isolation test is open-out 5000 feet, - and the technician wrote in the narrative that s/he repaired a drop wire that was cut by the customer, - and the disposition and cause codes were 0381 - 208, then this ticket would be counted as passing. The open-out test validates the 'no dial tone' being reported. The definition of disposition code 0381 is 'Buried Service Wire (BSW), Trouble in BSW - permanent repairs made and service has been restored'. Cause code 208 reflects that the customer caused the trouble. Therefore, the disposition and cause codes match the narrative, test and trouble reported.

 # Passed: Number of observations or trouble tickets that had correct disposition and cause codes in light of the trouble reported, test results, and technician narrative.

% Passing: Percent of observations or trouble tickets reviewed that had correct coding. This is calculated by taking the number of passing trouble tickets divided by the total

number of trouble tickets reviewed. Qwest's process for this audit is to have each network manager perform observations each week. The results of which are compiled by a network 'state lead' and forwarded to network corporate staff. The network corporate staff then produces the audit report as well as analyses results, provides feedback to the state teams, and makes modifications to the audit process, if necessary, to improve results.

Report Line Number	9

CR #	Title	Current Status / Date	Organization	Area Impacted	Products Impacted
PC053002-1	Real Time Dispute of TIC, Maintenance of Service Charges and Dispatch Charges.	Evaluation / 7/17/02	Wholesale ProdProc	Billing, Maintenance / Repair	Centrex, Resale, UNE Loop, UNE-P

Originator: Stichter, Kathleen
Originator Company Name: Eschelon
Director: Retka, Mary
Owner: Suellentrop, Craig
CR PM: Martin, Ric

Description Of Change

Currently a CLEC disputes a TIC, Maintenance of Service Charge or Dispatch Charge after the charge appears on the bill. Most of the time the CLEC knows before Qwest bills the charge, whether the charge is legitemate or not. Eschelon asks Qwest to develop, document, communicate and train a process to allow CLECs to dispute miscellaneous repair charges before Qwest bills them. This process would save Qwest the time and resources needed to issue an order to bill the charges and issue the paper work to adjust the charges billed in error. This process would also save research time needed to determine whether the charge is in error or not.

Status History

05/30/02 - CR Submitted by Eschelon
05/30/02 - CR acknowledged by P/P CMP Manager
05/31/02 - CR posted to Web
06/04/02 - Contacted Eschelon and scheduled Clarification Meeting for 06/05/02.
06/05/02 - Conducted Clarification Meeting conference call with Eschelon.
06/07/02 - Issued Clarification Meeting minutes to Eschelon.
06/19/02 - CMP Meeting - Meeting discussions will be set forth in the Product/Process Meeting Minutes to be posted on the CMP Web site. CR status was changed to Presented.
07/10/02 - Initial response sent to Eschelon and posted to the Web
07/17/02 - CMP Meeting - Meeting discussions will be set forth in the Product/Process Meeting Minutes to be posted on the CMP Web site. CR status was changed to Evaluation.

BillMate® Billing Diskette/CD-ROM Customer Guide

RELEASE 2.0

Printed in U.S.A.

Revision Log:

05/20/02:

1. Airtime.det: Column 13 – Elapsed time in minutes and seconds – is no longer used
2. Delivsvc.det: Column 14 – Elapsed time in minutes and seconds – is no longer used

TABLE OF CONTENTS

Section 1: Proprietary/Disclaimer Information

Section 2: Billmate Diskette CD-ROM Overview

Product Definition – Billmate® Billing Diskette/CD-ROM

The BillMate® Billing Diskette/CD-ROM product consists of billing data extracted from Qwest customer accounts. The data is arranged into files and produced on diskette or CD-ROM medium. The data is then provided to the subscribing customers each month, following the same schedule as the paper bill.

The file is created in American Standard Code (ASCII format) with quote marks (where appropriate) and commas as delimiters between the data elements - comma delimited. This file format is compatible with:

- IBM/MS DOS 3 1/2 inch High Density (1.44 Mb) or CD-ROM
- spreadsheets
- relational data bases
- word processing software packages

The customer provides their own software to process the data.

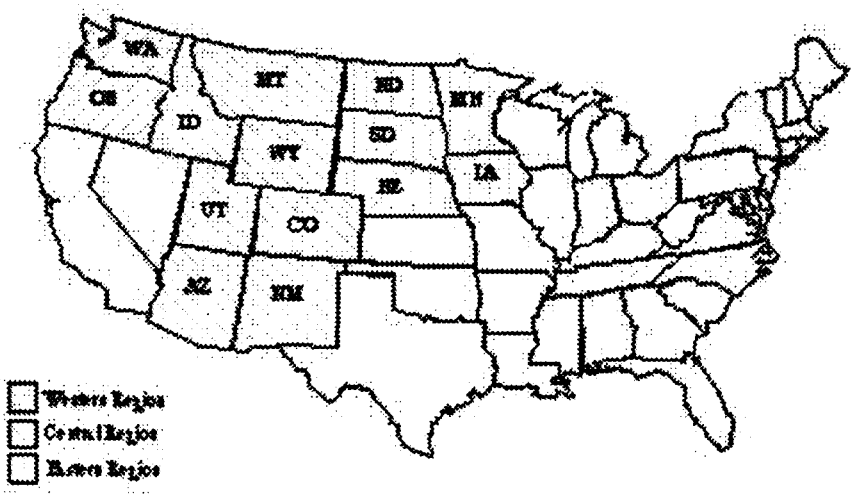
This documentation will serve as a Customer Guide.

REGIONAL DIFFERENCES

Qwest was originally three separate companies - Pacific Northwest Bell, Mountain Bell and Northwestern Bell. As a result there exists three separate regional-billing platforms. In some instances products and services may differ among the regions.

The differences may affect the data conveyed to each customer. Each diskette file and embedded fields will all be presented in a common format regardless of region.

Below is a map that shows the separate billing regions within Qwest.



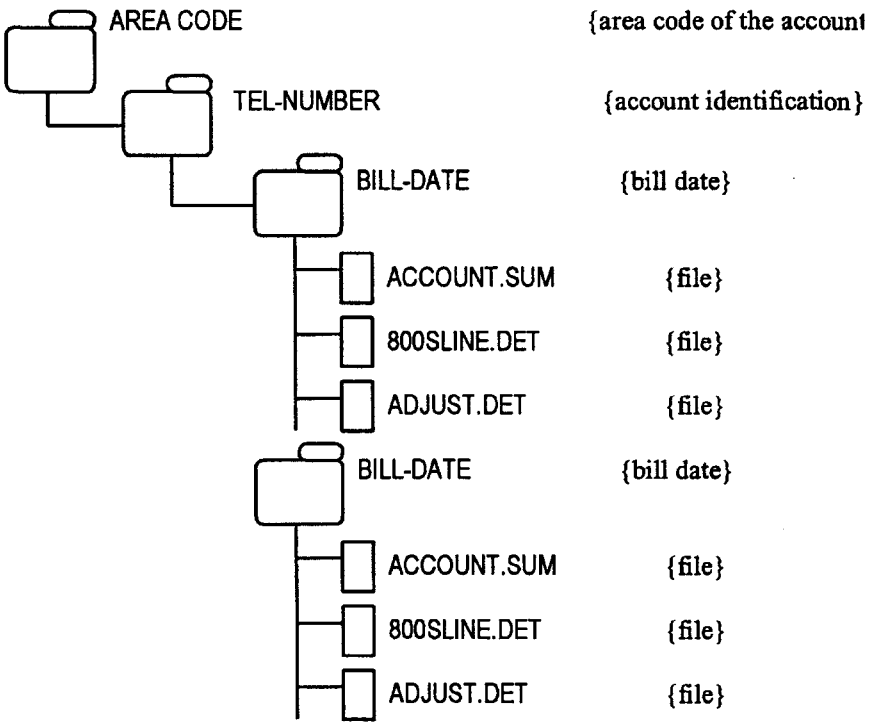
Section 3: Getting Started

Diskette/CD ROM Data Format

The files contained on the diskette(s) are stored in a compressed fashion. This allows for storing large volumes of data.

A data compression package is provided with each diskette or CD-ROM and includes an "de-compress" (explosion of data) program. The process is easy to use and loads the data to the drive of your choice. During this process, the data is separated into folders (sub-directories) and files. The billing data as well as the data "decompression" package are provided on the diskette.

The directory structure for the folders (sub-directories) is as follows:



Diskette Loading

Install the Data

BillMate® diskette data is now sent to customers in a self-extracting file.

To install the data select the data file and the double-click on it. You will then be prompted for the destination location of the data.

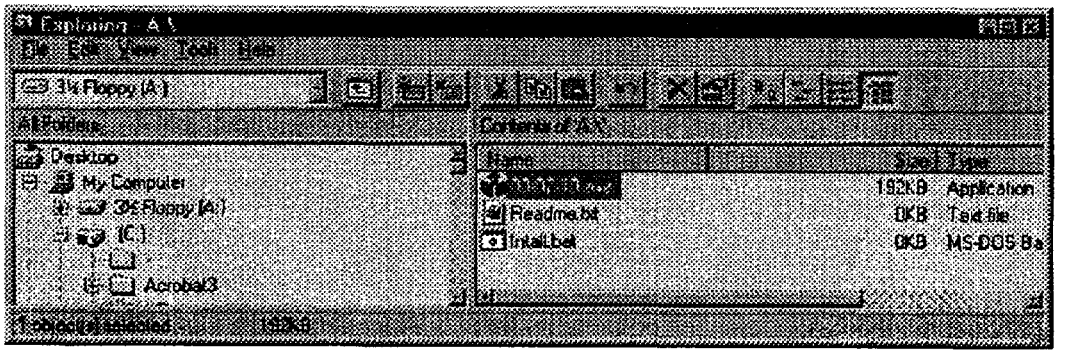
The format of the data file will be in Year Month Day (YY-MM-DD). For example, if you see 00-07-10.EXE, it would be data representing a billing period of July 10th, 2000.

The following example should help to load the BillMate® diskette/CD data. However, keep in mind that your drive letters, as well as your folder (sub-directory) name, could be different. For example, your diskette drive might be **A:** or **B:** and your CD-ROM drive might be **D:** or **E:**

Example:

Recommended approach.

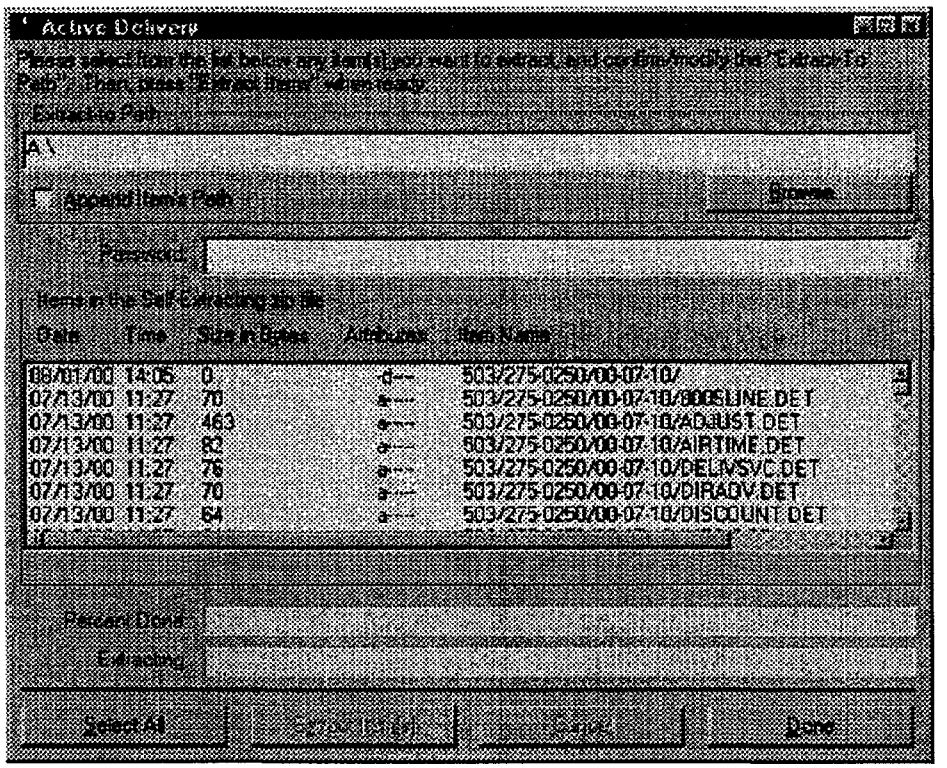
Open Windows Explorer (Windows NT Explorer) and select floppy drive, which – for most - will be the A:\ drive. If you receive CD-Rom media, use Explorer to select the CD drive. After that you should see something like:



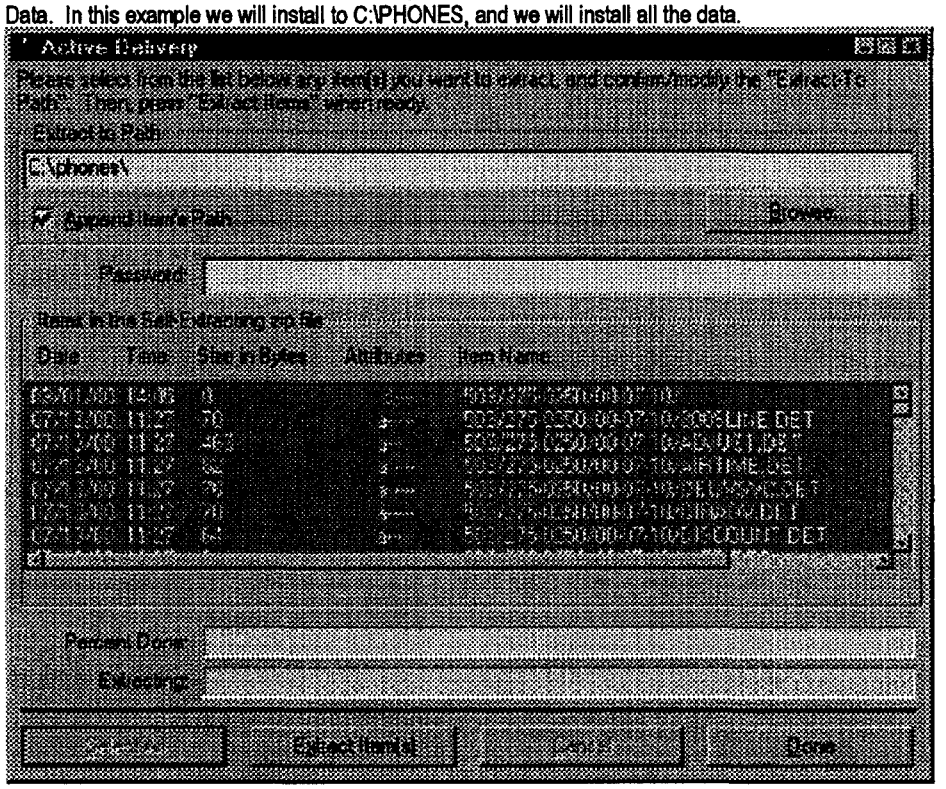
Then the '.exe' file, on the right side of the screen, and double-click on it. Note: this '.exe' file contains all files - for all your telephone numbers - including CSR data, if any. You will only receive one file for each area and billing period, regardless of the number billable accounts for which you receive BillMate© data.

If you wish to view the latest news, select, and click on, the Readme.txt file. The Install.bat file, as shown aboive, will open and display the Readme.txt file. After 9/1/2000 it will no longer be sent.

Next, you will see the main installation screen, which should look something like:

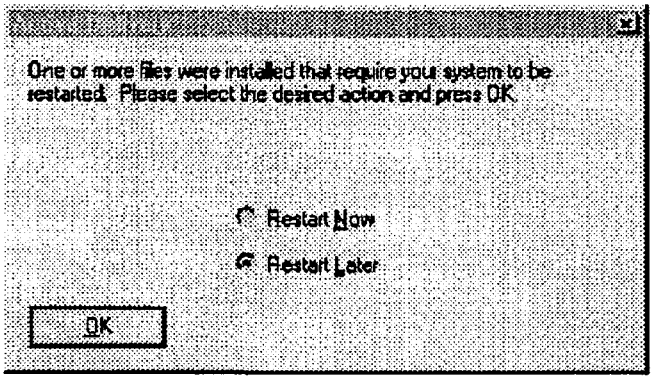


To continue installation you will need to change the Extract toPath to wherever you wish to install your BillMate© Data. In this example we will install to C:\PHONES, and we will install all the data.



To retain the correct structure of your data ee sure and select 'Append Item's Path'. Otherwise, if you have more than one telephone number, you will over-write your
data.

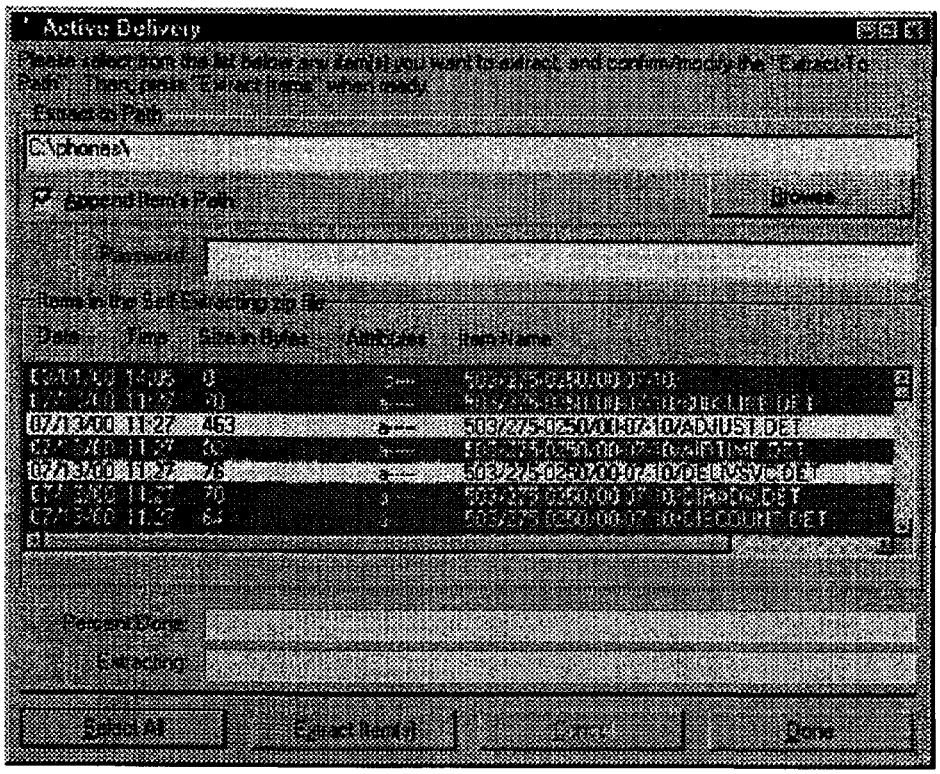
Now to finish the process, just click on the Extract Items button and the files will install. If you get a prompt that asks if you want to re-start your PC:



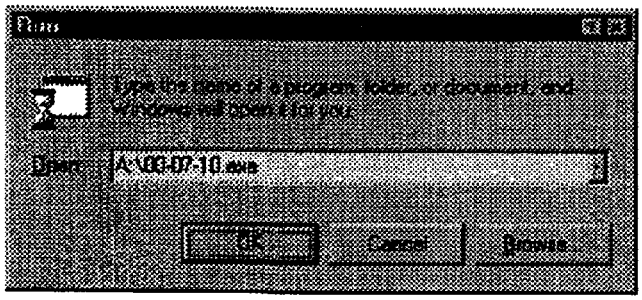
Be sure and select Restart Later, as it is not necessary to restart your PC.

To complete the process, just click on Done and you are finished.

If you choose to not install all the files, do not select the ones you do not want. To do this you can hold down the Shift Key and select each file to install, or, select all of them and hold down the Cntl Key and then click on the files you do not want to install. In this example we are selecting all but the Adjust.Sum and the Delivsvc.Det files.

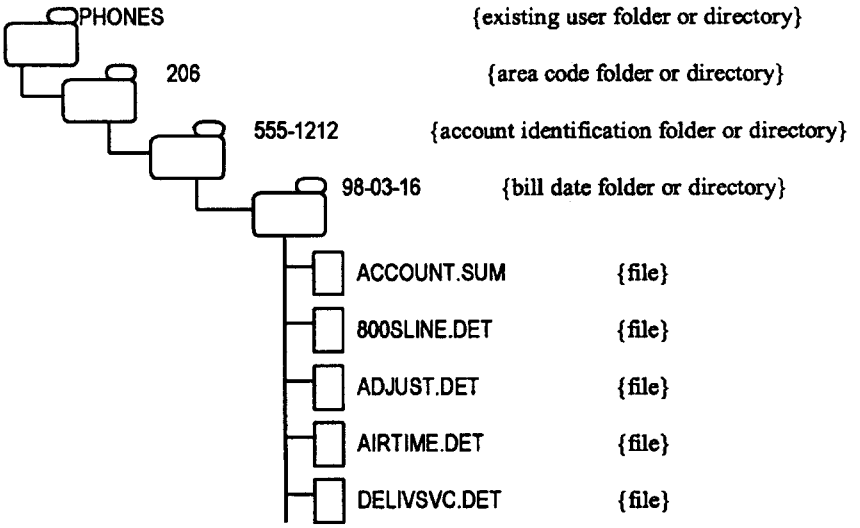


Alternate approach.
Another method of beginning the install process would be to select Start and Run, browsing to your BillMate© data drive and selecting the EXE file. It should look something like:



Click on OK and the process will proceed as described previously.

The results of the example might be:



Technical and Documentation Notes

BillMate® diskette/CD data uses two kinds of files - summary and detail. Summary files contain totals of detail records. Detail records contain individual charges and phrases. All files will exist on the diskette(s), even when data for the specific categories of information is not present. See **"Files"** for a complete list of file names and descriptions.

Each file may contain multiple records. Records are derived from a fixed number of individual data elements that can interface with most spreadsheet, word processing, and relational data base software pakcages. The data files can also be inserted into user constructed applications via the [IMPORT] command. The data is organized in a format most commonly referred to as ASCII DELIMITED WITH QUOTES AND COMMAS.

Each of the files begins with a column heading record. These column headings correspond to the data element numbers that are documented in the Customer Guide. The column headings are separated by commas and enclosed in double quotes (").

Included on diskette/CD is an inventory file named $PACKING.LST. This file contains a list of the files and their corresponding record counts. Files that show one (1) as a record count will depict those that contain only the column heading record, but without actual billing data.

Each data record consists of ASCII data elements separated by commas:

- Alphanumeric strings are delimited by double quotes (") without trailing blanks.
- Numeric elements are represented without leading zeros.
- Signs are leading ASCII plus (+) and minus (-) characters.
- Missing signs are assumed positive.
- Decimal places are denoted by the decimal point or period (.).
- Elements without decimals are whole numbers.
- When there is no data for an element, it will be represented by a null string consisting of a single space between double quotes (" ") for text strings or a single zero for numeric elements (0).

The following example shows how the files are structured (see next page).

- Each record depicts each element, by number, as it exists from left to right.
- Each element is listed by element #, column letter, format of the data and a description of the contents.
- Format is denoted by "A" for alphanumeric strings, "SN" for signed numeric strings and "N" for unsigned numeric strings.
- The second part of format in the example shows the maximum element size.
- Where the maximum size is followed by a slash character (/), the number that follows denotes the decimal positions to the right of the decimal point.

Sample File Layout

- **The following example describes a typical File/Record Document**

FILE: EXAMPLE.DET
DESC: Example Detail
DATE: 11-02-92

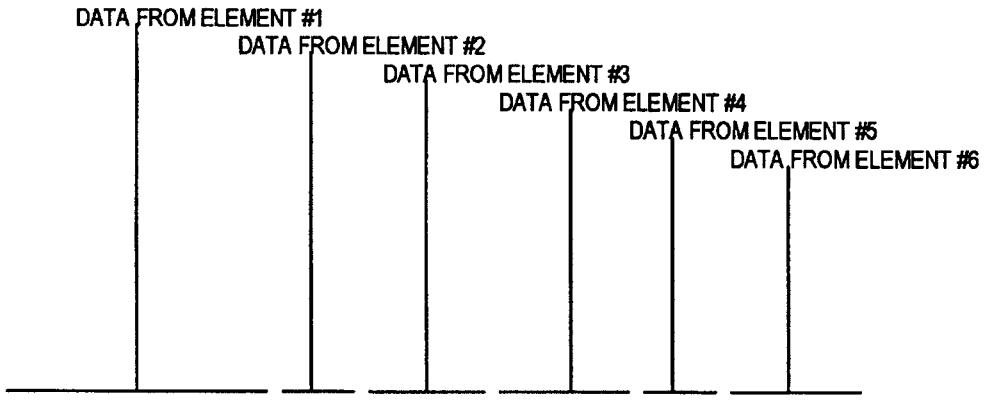
GENERAL NOTES:

These data elements correspond to those contained within the BillMate® diskette files.

#	C	FORMAT	CONTENTS
1	(A)	A 30	Data element #1 (spreadsheet column A) of the record is classified as ALPHANUMERIC with a maximum size of 30 characters. The data will be represented with ASCII characters bounded by double quotes; e.g. ["THIS IS THE DATA"].
2	(B)	N 6	Data element #2 (spreadsheet column B) of the record is classified as UNSIGNED NUMERIC INTEGER (without decimal positions and assumed positive) with a maximum size of 6 digits; e.g. [1234].
3	(C)	SN 7	Data element #3 (spreadsheet column C) of the record is a SIGNED NUMERIC INTEGER (without decimal positions) with a maximum size of 7 digits; e.g. [-1234567]. Note: The sign (-) does not count as a digit in the maximum size.
4	(D)	SN 9/2	Data element #4 (spreadsheet column D) of the record is classified as a SIGNED NUMERIC with a maximum size of 9 total digits, with 2 of those being decimal digits to the right of a decimal point; e.g. [+1234.56]. Note: The decimal point (.) does not count as a digit in the maximum size.
5	(E)	SN 3/3	Data element #5 (spreadsheet column E) of the record is a SIGNED NUMERIC with a maximum size of 3 digits, with all 3 being to the right of a decimal point; e.g. [+.123].
6	(F)	N 7/4	Data element #6 (spreadsheet column F) of the record is an UNSIGNED NUMERIC with a maximum size of 7 digits, with 4 of the digits being to the right of a decimal point; e.g. [765.1234].

This is an example of how the elements of a record look in a BillMate® diskette/CD file.

FILE: EXAMPLE.DET
DESC: Example Detail
DATE: 11-02-92



"THIS IS THE DATA", 1234, -1234567, +1234.56, +.123, 765.1234

Common Questions

Frequently Asked Questions (FAQ's) and Troubleshooting Guide

The following are frequently asked customer questions or situations pertaining to BillMate Diskette/CD-ROM. A Troubleshooting Guide for persons having difficulty getting started with or using the BillMate product follows. By checking here, you may be able to avoid making a call to resolve a problem that you are experiencing.

1. **What is the BillMate Billing Diskette Customer Guide?**
   This is a large paper document, contained in a three-ring binder, which explains all aspects of BillMate Diskette/CD-ROM service, and which is sent to each customer when the service is inaugurated. This list of questions/situations is included as a section of the Guide. Updates are regularly sent before changes in the service are made. Your organization should contact your Qwest account representative whenever the name or address of the person responsible for maintaining your copy of the guide changes.

2. **I don't have or can't find a copy of the Customer Guide.**
   It could be that the person at your organization who ordered the service from Qwest has a copy of the Guide. If not, or if that person is no longer with your organization, please contact your Qwest account representative and request another copy. You can also obtain a copy of the guide at:
   http://www.qwest.com/largebusiness/products/downloads/BMDiskCustGuidecurrent.pdf
3. **Is there a separate Customer Guide for CD-ROM users?**
   No, the information contained in the Guide is applicable to either Diskette or CD-ROM operations.

4. **Is the Customer Guide available on-line?**
   The Guide is available at:
   http://www.qwest.com/largebusiness/products/downloads/BMDiskCustGuidecurrent.pdf
5. **The Customer Guide is loaded with terms and acronyms that I don't understand. Can you provide me with some help?**
   Yes. Near the back of the Customer Guide is a Glossary that provides definitions for commonly used Qwest terms.

6. **What software is required to use/run the BillMate Diskette/CD-ROM?**
   BillMate Diskettes and CD-ROMs are compatible with most software packages that provide spreadsheet capability. It is important to note that the format used is "ASCII delimited with quotes and commas." You might need to select specifically for that format in setting up your files to receive the data contained on the Diskette/CD-ROM.

7. **If I sign up for this service, will I continue to receive a paper bill?**
   Yes, the paper bill is considered the "bill of record", and you will continue to receive it.

8. **Is it possible to have copies of my Diskettes/CD-ROMs sent to two or more addresses?**
   We do not have the capacity at this time to send you more than one copy of the Diskette/CD-ROM. If you need multiple copies and/or need them sent to different addresses, we suggest you check into diskette or CD-ROM duplication services in your local area.

9. **How long after the bill date should I expect to receive my Diskettes/CD-ROMs?**
   The process of collecting the monthly data for your accounts from our billing systems and getting it to our Diskette/CD-ROM production center can take up to seven days. The production center can usually produce Diskettes/CD-ROMs within a day, and they are mailed the next day.

10. **I didn't receive this month's Diskettes/CD-ROMs.**
    Check with your accounting group to determine if there have been payment problems, or check with your telecommunications group to see if there have been recent changes made to your account. In some cases, these situations can cause delays or changes in Diskette/CD-ROM delivery times. If there are no obvious answers, please feel free to call your Qwest account representative.

11. **How do I correlate the data from the Diskette/CD-ROM with the data on my paper bill?**
    In most cases, the data you receive on Diskette/CD-ROM will correlate with your paper bill. Where it might change slightly is with regional differences in our billing systems, discussed below, in which similar data might appear in different files. In addition, legal disclaimers and marketing messages that appear on the paper bill are not included in the electronic bill that you receive via Diskette or CD-ROM.

12. **There seem to be different formats for bills from different regions within Qwest.**
    You are right. There are three slightly different billing systems in use within Qwest: one for the states of Oregon and Washington (our Western region); one for the states of Arizona, Colorado, Idaho, Montana, New Mexico, Utah, and Wyoming (our Central region); and one for the states of Iowa, Minnesota, Nebraska, North Dakota, and South Dakota (our Eastern region). These legacy systems will be replaced with a single billing system with a common format, and we will announce the change when it is ready to be implemented.

13. **Why don't you make all of the fields the same length within a given record? Also, why are the double quote marks around some fields and not around others?**
    The records within a given file are variable in length because the fields are variable in length. The concept was to conserve space on the Diskette/CD-ROM by supplying a standard ANSCI COMMA DELIMITED format. Therefore, leading zeros on numeric fields and trailing spaces on non-numeric fields are suppressed. Null fields (where there is no data to convey) are passed as single characters. The format is compatible with most spreadsheet and relational data software packages. Quotes surround non-numeric fields (text) because the actual data itself may contain commas.

14. **I have an IBM compatible PC at home that I have *configured* with a derivative of the UNIX operating system. Will I be able to read the BillMate Billing Diskette/CD-ROM?**
    The data files themselves are constructed of standard (ANSI) ASCII characters that should be compatible with your system. However, the diskette drive must be able to access the data in the proper density (High Density) and the software driver for the diskette drive must be of the type to recognize IBM/MS DOS formats. Many of these types of systems are configured with software conversion utilities that allow the execution of MS DOS software. If yours is one of those, you should be able to read the Diskette.

15. **How do I store data in the compressed format on my hard drive?**
    The standard DOS COPY commands will leave the data compressed.

16. **There are generic column headings existing on the first record of each file that are not necessary for my relational data base application. How come they're there?**
    The column heading records are included as the first record of each file to allow customers who use spreadsheet packages to construct macros.

17. **My responsibility involves the audit of telephone calls billed to credit cards supplied by my organization. Are these calls identified some way?**
    Yes. Calls that are calling card billed are identified by the value "1" within a data element of the TOLL.DET file. The value of the calling card used for the billing of the call can be found in a different data element of the same record.

18. **You are sending the Diskettes/CD-ROMs to the wrong person or wrong address at my organization.**
    Please contact your Qwest account representative to request a name or address change. It is important that we have current addressee information so that you will be notified in advance of changes and upgrades to this service.

19. **What is a BTN?**
    BTN stands for Billing Telephone Number. It is the number at the top of your paper bill, against which all charges are posted, sometimes referred to as the account number. Other telephone numbers associated with a BTN are called Sub-Accounts. When you look at the Diskette/CD-ROM that we send to you, you'll note a BTN is displayed on the label. Other BTNs may be included on the same Diskette/CD-ROM, depending on the total size of your account.

20. **How do I add or delete accounts or BTNs from the monthly Diskette/CD-ROM?**
    To add or delete accounts, please contact your Qwest account representative.

21. **Who can I contact for BillMate Diskette/CD-ROM technical support?**
    For technical support, please call: 800-718-8859. The number is staffed during the workweek from approximately 7:00 a.m. to 4:00 p.m., Pacific time. If you call outside those hours or get a recording, please leave a message and you will be contacted soon as possible. You can also send an email to: jhorton@qwest.com

22. **Who can I contact to make suggestions for improvements?**
    Please call us at 800-718-8859 with any suggestions or technical questions about your BillMate Billing Diskette/CD-ROM service. You can also send an email to: jhorton@qwest.com

Troubleshooting

1. **I don't know how to access the data contained on the Diskette/CD-ROM.**
   Please refer to the front section of the Customer Guide, particularly the sections titled "Getting Started", "Diskette Loading", "Accessing the Command Prompt", and "Technical and Documentation Notes." The information contained in these sections will provide you with a step-by-step approach to accessing your data.

2. ***There is no data, or only unrecognizable data on the Diskette/CD-ROM.***
   Review the instructions found in the Guide in the "Diskette Loading", "Accessing the Command Prompt", and "Technical and Documentation Notes" sections. Also, if this is not your first time Diskette/CD-ROM setup, try accessing the data from a previous Diskette/CD-ROM to insure that your computer and files are set up properly. If there is still a problem, please call us at 800 718-8959, or email at: jhorton@qwest.com

3. **The data on the Diskette/CD-ROM is in the wrong format.**
   Review the instructions found in the Guide in the "Diskette Loading", "Accessing the Command Prompt", and "Technical and Documentation Notes" sections. Also, if this is not your first time Diskette/CD-ROM setup, try accessing the data from a previous Diskette/CD-ROM to insure that your computer and files are set up properly. It is also possible that we have indeed changed the format and that you have not seen the corresponding change that we made to the Customer Guide. if that is the case, please contact your Qwest account representative.

4. **When I use the IMPORT command to load data from the Diskette/CD-ROM into my spreadsheet template, the entire file seems to fill only the first cell.**
   The IMPORT command was probably set for ASCII TEXT rather than ASCII with COMMAS as the delimiters and QUOTES bounding text strings. Depending on which spreadsheet package you are using, the terminology may differ. Most often, the format is referred to as ASCII DELIMITED, ASCII DELIMITED WITH COMMAS AND QUOTES, ASCII WITH COMMAS, or TEXT WITH COMMAS. You will need to select the proper setting to recognize that format during the execution of the IMPORT command.

5. **I have an application that requires the separation of long distance charges into departments that are internal within my company. I can identify the messages on the TOLL.DET file for each department by using the data element for Prefix and Line Number, but I can't find individual tax figures for each message. Am I missing something?**
   No, you're not missing anything. The tax figures for each message are not available. Taxes are not applied on an individual charge basis on our telephone billing statements, but are computed on subtotals for each long distance carrier your company uses.

6. **When I load the diskette/CD-ROM data into my PC, the INSTALL process stores the files in a directory tree structure automatically. I want certain files to be stored under my own directories so that my applications don't have to be changed every month to access those files. Is there an easy way I can do this?**
   The directory structure used for the storage of the data is intended to help prevent the accidental destruction of previously received data files. It also provides a means to logically accumulate a history for each unique billing account associated with your company. Once stored on your machine, any or all of the files can be moved or copied to whichever directory paths your applications require.

7. **Many of the data elements on the files contain null values. Why isn't the data there for these fields?**
   The presence of a null value means that the data for that element did not exist for the specific product or service for that billing period. The null values are supplied in order to maintain a standard structure for the files.

8. **I keep running out of memory when I try to load one of the files into my spreadsheet. Do I have any alternatives besides buying a new machine or making my old one larger?**
   There may be some alternatives. One option might be to write a program that extracts only the data required for your application. Another option would be to use a different software package that has greater file size capabilities.

9. **There are a number of files associated with my Diskette/CD-ROM that are always empty except for the column heading record. I have to look at them to determine that. Why do you include empty files?**
   The "empty" files are included on the Diskette/CD-ROM to reflect a positive reporting mechanism to remove the uncertainty of missing files. To determine which files do not contain data, browse the $PACKING.LST file on the Diskette/CD-ROM. Any file with a record count of one (1) is an "empty" file.

To: Bill Difference Distribution Group

From: Catriona Dowling

Date: July 11, 2002

Subject: BOS Version 37 Differences List – **UNE-P**

Attached is the updated BOS Version 37 Bill Differences List for QWEST. BOS Version 37 was installed into IABS production with release 83 on Apr 27, 2002. **This update refers to BDT output for Unbundled Products (UNE-P) only**.

Availability for producing specified UNE-P accounts in the CABS/BOS BDT format through the IABS system was implemented 7/1/02.
IABS is formatting the CABS/BOS BDT records for UNE-P products from bill/CSR data that is created by the system (CRIS) that currently produces the Unbundled Bills and CSR's. As a result, data may be unavailable for IABS to accurately populate all values on the BDT records. The following details some of the known data limitations:

In the case where an account (Telephone Number (TN)) has been disconnected, no CSR data will be available but there may be bill data. Therefore, the BDT file may contain Bill records (10-xx-xx) with no corresponding CSR records (40-xx-xx).

Re. CSR SERVICES AND FEATURES LEFT HAND FID DATA (40-15-05-00):

- The Circuit (CLS, CLT) is not provided as a left-handed FID on the CSR and as a result will not be produced on a 40-15-05 record. The circuit will be included in the FID data on the 40-15-10-00 record. However, the TN will be presented as a left-handed FID on the 40-15-05 record.

Re. Edits

- Standard BOS edits will not be performed since IABS is simply formatting the BOS BDT records. The data necessary to perform the edits is not available.

Please refer to the attachments.
If you have any further questions, please call me at (303) 624-0528.
Thank you,
Catriona

Attachments

Company Name: QWEST
BOS Version 37.0
Reason for Issue: BOS 37 Update due to BOS Format of Unbundled Products

IABS Release: 84.01
Implementation Date: 07/01/02
Issue Date: 07/11/02
Previous Issue Date: 05/31/02

Part 1 - Record Space Differences

Record Name	Record ID	Record Positions	Status	Standard Version	Explanation of Difference	Item Impl Date

***Note: This difference was not accepted by the TRG and will be removed.**

Key to Status Codes: N = new difference, C = change to existing difference, 1 = tariff/regulatory requirements, 2 = temporary assignment from BCR 3 = standard not implemented, 4 = deviation made standard, 5 = miscellaneous, see explanation of difference

Company Name: QWEST
BOS Version 37.0
Reason for Issue: BOS 37 Update due to BOS Format of Unbundled Products

IABS Release: 84.01
Implementation Date: 07/01/02
Issue Date: 07/11/02
Previous Issue Date: 05/31/02

Part 2 - Redefinition/Additional Values/Code Sets for Existing Data Elements

Data Element Name	Status	Standard	Explanation of Difference	Item Impl Date
Activity Date	5		Bill Processing Date will be populated in Activity Date	07/01/02
Adjustment Thru Date	5		Will contain the effective date of the Adjustment	07/01/02
Circuit Format Ind	5		Will contain spaces	07/01/02
Recurring/Non-recurring Charge Ind	5		Will always contain a value of '1'	07/01/02
Service Established Date	5		Bill Processing Date will be populated in Service Established Date field.	07/01/02
Total Taxes	5		Will include Surcharges when present	07/01/02
USOC/FID Ind	5		Will always contain the value of "2", indicating USOC. FID information is not available from the originating system.	07/01/02
Unbundled Usage Rate	5	V40	Redefined data characteristics from SV9(9) to S9(2)V9(7) in order to accommodate whole numbers.	07/01/02

***Note: This difference was not accepted by the TRG and will be removed.**

Key to Status Codes: N = new difference, C = change to existing difference, 1 = tariff/regulatory requirements, 2 = temporary assignment from BCR
3 = standard not implemented, 4 = deviation made standard, 5 = miscellaneous, see explanation of difference

Company Name: QWEST
BOS Version 37.0
Reason for Issue: BOS 37 Update due to BOS Format of Unbundled Products

IABS Release: 84.01
Implementation Date: 07/01/02
Issue Date: 07/11/02
Previous Issue Date: 05/31/02

Part 3 - New and Local Use Phrase Codes

Phrase Code	Phrase	Status	Standard Version	Explanation of Difference	Item Implementation Date
X15	Charge for Unbundled Services	5		Local Use Phrase for Unbundled products' OC&C's	07/01/02
X18	Adjustment for Unbundled Services	5		Local Use Phrase for Unbundled Products' Adjustments	07/01/02

Reply Exhibit CLD-__

Comparing ASCII Bills to Paper Bills

This package contains a sub-account of a summary bill. The sub-account is presented in paper form & then with the ASCII records for the equivalent. The ASCII records have had blank & extraneous columns suppressed in order to get them to fit onto the paper better & simplify the comparison to the paper bill. Otherwise, these are actual, unaltered bill records. (Telephone # information should be considered confidential.)

The Bill Mate® file explanations are on the website for greater detail. Following is a comparison of the paper bills to the ASCII bills
The sub-account is 303-279-1912

The paper bill, Page 1 of 5, has the total amount billed. This can be seen on the ASCII record on the SUBACCT.SUM file.

SUBACCT.SUM DESCRIPTION

- Column 1 is the Summary Acct number (not shown in this portion of the paper bill).
- Column 2 is the Bill Date, matching the Bill Date in the upper right of the paper bill.
- Column 6 is the Sub-Account number, which corresponds to the Account No at the top right of the paper bill.
- Column 8 & 9 show the CLEC that order activity appeared on the bill & do not have an equivalent on the sub account's paper bill.
- Column 11 has the sub-account's total new charges, which matches the paper bill's Total New Charges.

Page 2 of 5 has no charges but does contain a bill phrase about the bill date. This bill phrase can be found as the last record of the SOACTVTY.DET file (which is a 2 page file—first page has the left half of the record, second page has the right half—so set them side by side to read). This phrase is the last line of this file.

Page 3 of 5 begins with the Itemized Service. The ASCII equivalent is included in the MONSERV.DET file.

MONSERV.DET DESRIPTION

- Column 1 is Sub-Acct number, & corresponds to the Account No at the top right of the paper bill.
- Column 2 is the Bill Date, matching the Bill Date in the upper right of the paper bill.
- Column 3 is the working telephone number (WTN) – this is not shown on the paper bill.
- Columns 7 & 8 are begin & end dates. They are populated only once per sub-account rather than on every line The last line of the file shows that the recurring charges are billed for the period May 28, 2002 thru June 27, 2002.
- Column 9 is the USOC quantity – this matches the quantity just to the left of the English description on the paper bill. Column 10 is the USOC being billed.
- Columns 11 & 12 contain the English description of the USOC – matching the English description on the paper bill.
- Column 16 is the monthly rate. Note the last line has the total of all the rows above it. This matches the paper bill's total under Itemized Service.

Following the Itemized Service section of the paper bill is the Account Detail. This information can be found on the ASCII file ACCOUNT.SUM.

ACCOUNT.SUM DESCRIPTION

- Column 1 again contains the Sub-Account number.
- Column 2 again contains the Bill Date.
- Column 3 contains a supplier provider value—not typically required for validation.
- Column 4 contains working telephone number. Since this data is presented at a sub-account level, the working telephone number is blank.

- Column 5 contains department code—a way to identify which department of a company a particular charge belongs to. It is not used on this bill or most bills.

- Column 6 contains an English language description of what is being billed.

- Column 7 contains the billed charges. Note that all paper bill charges match the ACCOUNT.SUM information, except MONTHLY SERVICE CHARGES. This is because, on the paper bill, after the heavy line running across the page, the MONTHLY SERVICE CHARGE is shown as having two component charges – MONTHLY SERVICE and a MUNICIPAL CHARGE. THE ACCOUNT.SUM file provides both of these components. Additional items with zero charge (e.g., LOCAL TAXES) are shown in the ACCOUNT.SUM file, and are suppressed on the paper bill.

Next on the paper bill is the Service Additions & Changes Section. The ASCII bill includes this information in the SOACTVTY.DET file.

SOACTVTY.DET DESCRIPTION

- Column 1 contains the Sub-Account number.

- Column 2 is the Bill Date.

- Column 7 is order date (MMDDYYYY, with the leading zero suppressed), corresponding to the date following the SERVICE CHARGE line on the paper bill.

- Column 8 is order type (N= New Connect) – matching the first character of the SERVICE ORDER NO on the paper bill.

- Column 9 is the order # - matching the remainder of the SERVICE ORDER NO on the paper bill.

- Column 10 is the Purchase Order Number – matching the PON value on the paper bill.

- Column 11 is USOC quantity – matching the number to the left of the service description on the paper bill.

- Column 12 is USOC – matching the value in the 3rd column from the right on the paper bill.

- Columns 13, 14, 17 &18 are all English descriptions of what Qwest is billing, matching the wording on the paper bill.

- Column 22 contains the unit rate—the full monthly rate for monthly recurring charges (identified by 'F'—for fractional charges--in Column 34), or the non-recurring charge (NRC) for those charges (identified by 'N' in Column 34). These NRCs are usually the one-time installation charge. This corresponds to the paper bill's data in the 2nd column from the right.

- Column 24 is the billed charge. In the case of fractional charges, this is the pro-rated amount of the monthly rate in column 22. For NRCs, it's the same as the amount in column 22.

- Column 24 corresponds to the right-most column in the paper bill's svc additions & changes section.

This section of the paper bill finishes up on page 4 of 5. All of these charges match the charges on the paper bill.

Page 4 of 5 of the paper bill contains the INTERCONNECTION USAGE section. This is found in the MEASSVC.DET file of the ASCII bill. Note that there are two entries for each billed element – the first contains the billed minutes, and the second contains the billed amount.

MEASSVC.DET DESCRIPTION

- Column 1 is the Sub-Account number.

- Column 2 is the Bill Date.

- Column 6 contains the English description of what is being billed (both Local minutes of use and Shared Transport currently have the same English description—the subject of a new CMP CR that Eschelon mentioned in their Comments).

- Column 8 contains the bill date.

- Column 11 contains the number of minutes being billed. This is by WTN, and is separated by Local minute of use and Shared Transport.

- Column 15 contains the pre-discounted billable amount.

- Column 18 is the amount actually billed.

For UNE-P, columns 15 and 18 are always equal. Note that the totaled amount of interconnection usage billed is presented to the CLEC on the ACCOUNT.SUM file on the Local Measured Service line.

On Page5 of 5 is the DIRECTORY ASSISTANCE billing. This is on the LDMISC.DET section of ASCII.

LDMISC.DET DESCRIPTION

- Column 1 contains the Sub-Account number.
- Column 2 contains the Bill Date.
- Column 6 contains the English language description of the service being billed.
- Column 8 contains the quantity of calls – matching the number of calls on the paper bill.
- Column 9 contains the rate for the service, matching the rate on the paper bill found after the @ sign.
- Column 16 contains the total charges for the service – matching the total charges on the paper bill found in the right-hand column.

Qwest.

CENTENNIAL ENGINEERING
SUIT 240
Bill Date: May 28, 2002
Account No: 303-279-1912-114B

www.qwest.com

Balance Forward	New Charges	Total Amount Billed
$.00	$396.26	$396.26

Account Summary

▼ New Charges	For questions, call:	Page	
Qwest	1-800-559-0634	2	.00
Qwest Resale/Interconnect	1-800-559-0634	3	396.26
Total New Charges			**$396.26**

If your problem with Qwest has not been resolved, please ask to speak to a manager at 1-800-559-0634.

Qwest, Denver, CO 80244-0001

continued on back

Qwest

For questions, call 1-800-559-0634

CENTENNIAL ENGINEERING
SUIT 240
Bill Date: May 28, 2002
Account No: 303-279-1912-114B

QWEST LOCAL SERVICES

▼ **ACCOUNT DETAIL**

SERVICE ADDITIONS AND CHANGES		.00
	TOTAL	**$.00**

▼ **SERVICE ADDITIONS AND CHANGES**

1. YOUR BILL DATE IS THE 28TH OF EACH MONTH. THE MONTHLY CHARGE FOR SERVICE IS BILLED IN ADVANCE

SUBTOTAL	**$.00**

QWEST LOCAL SERVICES	**$.00**

• ITEMIZED SERVICE			
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL		20.80
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, PRIMARY		20.80
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL		20.80
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL		20.80
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL		20.80
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL		20.80
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		.43
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		.43
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		.43
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		.43
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		.43
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		.43
		TOTAL	127.38

ACCOUNT DETAIL

MONTHLY SERVICE CHARGES		129.29
SERVICE ADDITIONS AND CHANGES		262.49
INTERCONNECTION USAGE		3.44
ITEMIZED CALLS		.00
DIRECTORY ASSISTANCE		1.04
QWEST RESALE/INTERCONNECT	**TOTAL**	**$398.26**

MONTHLY SERVICE - MAY 28 THRU JUN 27	127.38
MUNICIPAL CHARGE	1.91
QWEST RESALE/INTERCONNECT SUBTOTAL OF MONTHLY SERVICE CHARGES	**$129.29**

SERVICE ADDITIONS AND CHANGES

	SERVICE ORDER NO N82994114				
1	SERVICE CHARGE ON 05-06-02		USOC		Billed Charge
	PON CO174226EIBC			Unit Rate	
Quantity → 1	UNE-P NEW INSTALL NRC		NHCRA		75.83
5	UNE-P NEW INSTALL NRC		NHCRC		97.50
					14.86
2	CHARGE FOR MONTHLY SERVICE AT 21.23				
	FROM 05-06-02 TO 05-28-02				
	PON CO174226EIBC	303 279 1888			
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL		U5RAX	20.80	
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		PORXX	.43	
			TOTAL	21.23	
3	CHARGE FOR MONTHLY SERVICE AT 21.23				14.86
	FROM 05-06-02 TO 05-28-02				
	PON CO174226EIBC	303 279 1912			
1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, PRIMARY		U5R	20.80	
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY		PORXX	.43	
			TOTAL	21.23	
4	CHARGE FOR MONTHLY SERVICE AT 21.23				14.86
	FROM 05-06-02 TO 05-28-02				
	PON CO174226EIBC	303 279 1921			

continued on back

1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL	U5RAX	20.80	
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY	PORXX	.43	
		TOTAL	21.23	

5 CHARGE FOR MONTHLY SERVICE AT 21.23 — 14.86
FROM 05-08-02 TO 05-28-02
PON CO174226E1BC 303 279 1979

1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL	U5RAX	20.80	
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY	PORXX	.43	
		TOTAL	21.23	

6 CHARGE FOR MONTHLY SERVICE AT 21.23 — 14.86
FROM 05-08-02 TO 05-28-02
PON CO174226E1BC 303 279 1984

1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL	U5RAX	20.80	
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY	PORXX	.43	
		TOTAL	21.23	

7 CHARGE FOR MONTHLY SERVICE AT 21.23 — 14.86
FROM 05-08-02 TO 05-28-02
PON CO174226E1BC 303 279 1990

1	MEASURED LINE 2 WIRE LOOP AND ANALOG LINE SIDE PORT, ADDL	U5RAX	20.80	
1	FEDERAL CHARGE - SERVICE PROVIDER NUMBER PORTABILITY	PORXX	.43	
		TOTAL	21.23	

A WHOLESALE DISCOUNT HAS BEEN APPLIED.

QWEST RESALE/INTERCONNECT SUBTOTAL - SERVICE ADDITIONS & CHANGES $262.49

- **INTERCONNECTION USAGE**

LOCAL ORIGINATING MINUTES OF USE

USAGE FROM:	MINUTES
303 279-1888	19
303 279-1912	137
303 279-1921	300
303 279-1979	179
303 279-1984	523
303 279-1990	38

NUMBER OF MINUTES	RATE PER MINUTE	
1,196	.0028300	3.39

SHARED TRANSPORT MINUTES OF USE

FOR YOUR INFORMATION:	
303 279-1912	90 MINUTES
303 279-1921	271 MINUTES
303 279-1979	96 MINUTES
303 279-1984	115 MINUTES

NUMBER OF MINUTES	RATE PER MINUTE	
572	.0000800	.05

SUBTOTAL $3.44

• DIRECTORY ASSISTANCE

DIRECTORY ASSISTANCE	1 CALLS @ 1.04	1.04
	A WHOLESALE DISCOUNT HAS BEEN APPLIED.	
	SUBTOTAL	**$1.04**
	QWEST RESALE / INTERCONNECT CURRENT CHARGES	**$396.26**

Subacct.sum

Summary Acct #	Bill Date	Sub-Acct #		Order #	Order Description	Sub-Acct charges
#1	#2	#6	#7	#8	#9	#11
3031116766997 K	5282002	3032791912114	2	N82994114	NEW CONNECT	396.26

Monserv.det

Sub-Acct #	Bill Date	WTN	Begin Date	End Date	Quantity	USOC	English Description	English Description (cont.)	
#1	#2	#5	#7	#8	#9	#10	#11	#12	#16
3032791912114 2	5282002	3032791888	0	0	1	U5RAX	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, ADDL	20.8
3032791912114 2	5282002	3032791912	0	0	1	U5R	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, PRIMARY	20.8
3032791912114 2	5282002	3032791921	0	0	1	U5RAX	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, ADDL	20.8
3032791912114 2	5282002	3032791979	0	0	1	U5RAX	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, ADDL	20.8
3032791912114 2	5282002	3032791984	0	0	1	U5RAX	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, ADDL	20.8
3032791912114 2	5282002	3032791990	0	0	1	U5RAX	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, ADDL	20.8
3032791912114 2	5282002	3032791888	0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43
3032791912114 2	5282002	3032791912	0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43
3032791912114 2	5282002	3032791921	0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43
3032791912114 2	5282002	3032791979	0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43
3032791912114 2	5282002	3032791984	0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43
3032791912114 2	5282002	3032791990	0	0	1	PORXX	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43
3032791912114 2	5282002		5282002	6272002					127.38

Account.sum

Sub Acct #	Bill Date	Provider	WTN	Dept Code	English Description	Billed Charges
#1	#2	#3	#4	#5	#6	#7
3032791912114 2	5282002				MUNICIPAL CHARGE	1.91
3032791912114 2	5282002				UNIVERSAL SERVICE FUND - USAGE	0
3032791912114 2	5282002				MONTHLY SERVICE CHARGES	127.38
3032791912114 2	5282002				DIRECTORY ASSISTANCE CHARGES	1.04
3032791912114 2	5282002				ORDER ACTIVITY CHARGES/CREDITS	262.49
3032791912114 2	5282002		0		TOTAL TAXES	0
3032791912114 2	5282002		1000		TOTAL TAXES	0
3032791912114 2	5282002				LOCAL MEASURED SERVICE	3.44

Soactvty.det

Sub-Acct #	Bill Date	Ord Date		Ord Num	PON	Quant	USOC	English Description
#1	#2	#7	#8	#9	#10	#11	#12	#13
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	NHCRA	SERVICE CHARGE ON 05-06-02
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	5	NHCRC	SERVICE CHARGE ON 05-06-02
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	U5RAX	CHARGE FOR MONTHLY SERVICE AT 20.80
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	PORXX	CHARGE FOR MONTHLY SERVICE AT .43
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	U5R	CHARGE FOR MONTHLY SERVICE AT 20.80
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	PORXX	CHARGE FOR MONTHLY SERVICE AT .43
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	U5RAX	CHARGE FOR MONTHLY SERVICE AT 20.80
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	PORXX	CHARGE FOR MONTHLY SERVICE AT .43
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	U5RAX	CHARGE FOR MONTHLY SERVICE AT 20.80
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	PORXX	CHARGE FOR MONTHLY SERVICE AT .43
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	U5RAX	CHARGE FOR MONTHLY SERVICE AT 20.80
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	PORXX	CHARGE FOR MONTHLY SERVICE AT .43
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	U5RAX	CHARGE FOR MONTHLY SERVICE AT 20.80
3032791912114 2	5282002	5062002	N	82994114	CO174226EIBC	1	PORXX	CHARGE FOR MONTHLY SERVICE AT .43
3032791912114 2	5282002	5062002		0	CO174226EIBC	0		YOUR BILL DATE IS THE 28TH OF EACH MONTH. THE

Soactvty.det (continued)

English Description #14	English Description #17	English Description #18	Unit Rate #22	Billed Chg #24	Type #34
	UNE-P NEW INSTALL NRC		75.83	75.83	N
	UNE-P NEW INSTALL NRC		97.5	97.5	N
FROM 05-06-02 TO 05-28-02	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, ADDL	20.8	14.86	F
FROM 05-06-02 TO 05-28-02	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43	0	F
FROM 05-06-02 TO 05-28-02	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, PRIMARY	20.8	14.86	F
FROM 05-06-02 TO 05-28-02	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43	0	F
FROM 05-06-02 TO 05-28-02	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, ADDL	20.8	14.86	F
FROM 05-06-02 TO 05-28-02	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43	0	F
FROM 05-06-02 TO 05-28-02	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, ADDL	20.8	14.86	F
FROM 05-06-02 TO 05-28-02	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43	0	F
FROM 05-06-02 TO 05-28-02	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, ADDL	20.8	14.86	F
FROM 05-06-02 TO 05-28-02	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43	0	F
FROM 05-06-02 TO 05-28-02	MEASURED LINE 2 WIRE LOOP AND	ANALOG LINE SIDE PORT, ADDL	20.8	14.86	F
FROM 05-06-02 TO 05-28-02	FEDERAL CHARGE - SERVICE	PROVIDER NUMBER PORTABILITY	0.43	0	F
MONTHLY CHARGE FOR SERVICE IS BILLED IN ADVANCE			0	0	N

Meassvc.det

Sub-Acct # #1	Bill Date #2	English Description #6	Bill Date #8	Minutes #11	Pre-disc Amt #15	Billed Amt #18
3032791912114 2	5282002	USAGE ACCUMULATED AT THE DAYTIME RATE	5282002	19	0	0
3032791912114 2	5282002	TOTAL CHARGES DAYTIME RATE	5282002	0	0.05	0.05
3032791912114 2	5282002	USAGE ACCUMULATED AT THE DAYTIME RATE	5282002	137	0	0
3032791912114 2	5282002	TOTAL CHARGES DAYTIME RATE	5282002	0	0.39	0.39
3032791912114 2	5282002	USAGE ACCUMULATED AT THE DAYTIME RATE	5282002	300	0	0
3032791912114 2	5282002	TOTAL CHARGES DAYTIME RATE	5282002	0	0.85	0.85
3032791912114 2	5282002	USAGE ACCUMULATED AT THE DAYTIME RATE	5282002	179	0	0
3032791912114 2	5282002	TOTAL CHARGES DAYTIME RATE	5282002	0	0.51	0.51
3032791912114 2	5282002	USAGE ACCUMULATED AT THE DAYTIME RATE	5282002	523	0	0
3032791912114 2	5282002	TOTAL CHARGES DAYTIME RATE	5282002	0	1.48	1.48
3032791912114 2	5282002	USAGE ACCUMULATED AT THE DAYTIME RATE	5282002	38	0	0
3032791912114 2	5282002	TOTAL CHARGES DAYTIME RATE	5282002	0	0.11	0.11
3032791912114 2	5282002	USAGE ACCUMULATED AT THE DAYTIME RATE	5282002	90	0	0
3032791912114 2	5282002	TOTAL CHARGES DAYTIME RATE	5282002	0	0.01	0.01
3032791912114 2	5282002	USAGE ACCUMULATED AT THE DAYTIME RATE	5282002	271	0	0
3032791912114 2	5282002	TOTAL CHARGES DAYTIME RATE	5282002	0	0.02	0.02
3032791912114 2	5282002	USAGE ACCUMULATED AT THE DAYTIME RATE	5282002	96	0	0
3032791912114 2	5282002	TOTAL CHARGES DAYTIME RATE	5282002	0	0.01	0.01
3032791912114 2	5282002	USAGE ACCUMULATED AT THE DAYTIME RATE	5282002	115	0	0
3032791912114 2	5282002	TOTAL CHARGES DAYTIME RATE	5282002	0	0.01	0.01

Ldmisc.det

Sub-Acct #	Bill Date	English Description	Quant	Rate	Amt Billed
#1	#2	#6	#8	#9	#16
3032791912114 2	5282002	DIRECTORY ASSISTANCE	1	1.04	1.04

July 25, 2002

Ex Parte – REDACTED – FOR PUBLIC INSPECTION

BY HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St, S.W., TW-B204
Washington, D.C. 20554

Re: Application of Qwest Communications International Inc. To Provide In-region InterLATA Services in the States of Colorado, Idaho, Iowa, Nebraska and North Dakota, Docket No. 02-148

Dear Ms. Dortch:

Yesterday Sue Burson, Andrew Crain, Christie Doherty, Loretta Huff, Sue Kriebel, Nancy Lubamersky, Melissa Newman, Dan Poole, Alan Zimmerman, Brad Wickes, Peter Rohrbach, Yaron Dori, and Anthony Miranda, all representing Qwest Communications International Inc. ("Qwest"), met with Michael Carowitz, Michael Engel, and Robert Tanner of the Wireline Competition Bureau. At staff's request, Qwest provided information on its Wholesale bill auditability. The attached documents were provided to staff at the meeting.

Pursuant to the Public Notice in this proceeding, Qwest is submitting an original and two copies, appropriately redacted, of the documents provided to staff at the meeting. Qwest separately is submitting one copy of the confidential document that was provided. Six copies of the confidential and redacted versions of the documents also are being submitted to Gary Remondino of the FCC's Wireline Competition Bureau's Policy Division.

Qwest submits the enclosed documents with the understanding that they will be subject to the Protective Order in this proceeding. Inquiries regarding

access to the confidential portion of these documents (subject to the terms of the Protective Order) should be addressed to the following:

C. Jeffrey Tibbels
Hogan & Hartson LLP
555 13th Street, N.W.
Washington, D.C. 20004
Tel: 202-637-6968
Fax: 202-637-5910

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions.

Sincerely,

Yaron Dori

cc: M. Carowitz
M. Engel
R. Tanner
E. Yockus
G. Remondino
M. Cohen
J. Prisbey
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith

Disputes (CRIS) – Wholesale

REDACTED – FOR PUBLIC INSPECTION

MEETING WITH FCC

July 23, 2002

3PT demonstrates Wholesale bills are complete and accurate.

Commercial performance results support completeness and accuracy

CLECs use ASCII bills

ASCII and paper bills from same data source; bill validation ensures match

Disputes accepted based on any bill format
- Dispute Procedures document
- CLEC sample disputes

CLECs can outsource bill validation services
- www.chrsolutions.com
- www.broadmargin.com

Commercially available software can be used for validating
- Microsoft Excel/Access
- TEOCO (www.teoco.com)

Dispute resolution process

Qwest responds to CLEC billing questions
- Toll-free number
- Web information

No late payment charges

Customized support and assistance is available

CLEC 1 Dispute
(one month)

Sub account	Line level	Quantity	USOC in Dispute	Disputed amount
8820986 2	158820	23	PT312	116.61
7960972 2	727960	23	PT312	116.61
4600821 2	414600	23	PT312	116.61
7795736 2	497795	23	PT312	116.61
1083495 2	921083	12	PT312	60.84
1083495 2	921138	4	PT312	20.28
1083495 2	922680	7	PT312	35.49
2500745 2	832500	16	PT312	81.12
2386597 2	421373	1	T2DCX	5.07
2386597 2	421378	1	T2DCX	5.07
2386597 2	421384	1	T2DCX	5.07
2386597 2	421386	1	T2DCX	5.07
2386597 2	421390	1	T2DCX	5.07
2386597 2	421398	1	T2DCX	5.07
2386597 2	421416	1	T2DCX	5.07
2386597 2	421418	1	T2DCX	5.07
2386597 2	421432	1	T2DCX	5.07
2386597 2	421436	1	T2DCX	5.07
2386597 2	421442	1	T2DCX	5.07
2386597 2	421453	1	T2DCX	5.07
2386597 2	421457	1	T2DCX	5.07
2386597 2	421460	1	T2DCX	5.07
2386597 2	421464	1	T2DCX	5.07
2386597 2	421467	1	T2DCX	5.07
2386597 2	421470	1	T2DCX	5.07
2386597 2	421481	1	T2DCX	5.07
2386597 2	421498	1	T2DCX	5.07
2386597 2	421517	1	T2DCX	5.07
2386597 2	421518	1	T2DCX	5.07
2386597 2	421521	1	T2DCX	5.07
2386597 2	421539	1	T2DCX	5.07
2386597 2	452386	1	T2DCX	5.07
9000258 2	259000	1	T2JCX	5.07
9000258 2	259000	1	T2JCX	5.07
9000258 2	259000	1	T2JCX	5.07
9000258 2	259000	1	T2JCX	5.07
9000258 2	259000	1	T2JCX	5.07
9000258 2	259000	1	T2JCX	5.07
9000258 2	259000	1	T2JCX	5.07
9000258 2	259000	1	T2JCX	5.07
3700599 2	913700	1	T2JCX	5.07
3700599 2	913700	1	T2JCX	5.07
3700599 2	913700	1	T2JCX	5.07
3700599 2	913700	1	T2JCX	5.07
3700599 2	913700	1	T2JCX	5.07
3700599 2	913700	1	T2JCX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07

Sub account	Line Level	Quantity	USed in Dispute	Disputed amount
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
8530702 2	858530	1	T2JOX	5.07
				978.51

CLEC 2 Dispute

One Month

BillDate	BAN	AccountNumber	USOC	Description1	Description3	ChargeOrCredit
22-Feb-02	[redacted]Z224440183	[redacted]9332	NPU	ONE-TIME CHARGE FOR	NON-PUBLISHED SERVICE	$12.35
22-Feb-02	[redacted]Z224440183	[redacted]5118	NPU	ONE-TIME CHARGE FOR	NON-PUBLISHED SERVICE	$12.35
22-Feb-02	[redacted]Z224440183	[redacted]0312	NPU	ONE-TIME CHARGE FOR	NON-PUBLISHED SERVICE	$12.35
22-Feb-02	[redacted]Z224440183	[redacted]0445	NPU	ONE-TIME CHARGE FOR	NON-PUBLISHED SERVICE	$12.35
22-Feb-02	[redacted]Z224440183	[redacted]7089	NPU	ONE-TIME CHARGE FOR	NON-PUBLISHED SERVICE	$12.35
22-Feb-02	[redacted]Z224440183	[redacted]7089	NPU	CHARGE FOR SERVICE AT NEW ADDRESS		$1.48
22-Feb-02	[redacted]Z224440183	[redacted]0445	NPU	CHARGE FOR SERVICE AT NEW ADDRESS		$1.14
22-Feb-02	[redacted]Z224440183	[redacted]0312	NPU	CHARGE FOR SERVICE AT NEW ADDRESS		$1.01
22-Feb-02	[redacted]Z224440183	[redacted]9332	NPU	CHARGE FOR SERVICE AT NEW ADDRESS		$1.01
22-Feb-02	[redacted]Z224440183	[redacted]5116	NPU	CHARGE FOR SERVICE ADDED		$0.54
22-Feb-02	[redacted]Z224440183	[redacted]9760	NPU	SERVICE REMOVED SUBJECT TO MINIMUM		$0.13
					Total:	$67.06

CLEC 3 Dispute
One Month

208 B11-3301 885	CTC charges	URCCU	URCCY	not billed	Billed on Apr 28, 2001 for [redacted]110M
sub-accounts	# OF LINES	1st line @ $7.38	Adl line @ $1.39	Total Debit	
					Adjustments-Total Credit
[redacted]-0108 033	1	7.38	0	$ 7.38	
[redacted]-0202 637	2	7.38	1.39	$ 8.77	
[redacted]					
[redacted]-3676 199	2	7.38	1.39	$ 8.77	
[redacted]-5632 151	2	7.38	1.39	$ 8.77	
[redacted]-6846 920	2	7.38	1.39	$ 8.77	
[redacted]-7800 927	3	7.38	2.78	$ 10.16	
[redacted]-9271 142	1	7.38	0	$ 7.38	
[redacted]-0700 042	4	7.38	4.17	$ 11.55	
[redacted]-0936 444	5	7.38	5.56	$ 12.94	
[redacted]					
[redacted]-4663 790	3	7.38	2.78	$ 10.16	
[redacted]-6679 730	1	7.38	0	$ 7.38	
[redacted]-7585 816	2	7.38	1.39	$ 8.77	
[redacted]-0252 529	3	7.38	2.78	$ 10.16	
[redacted]-2081 795	2	7.38	1.39	$ 8.77	
[redacted]-1001 463	2	7.38	1.39	$ 8.77	
[redacted]-6326 286	1	7.38	0	$ 7.38	
[redacted]-0200 485	1	7.38	0	$ 7.38	
[redacted]-2273 105	1	7.38	0	$ 7.38	
[redacted]-1355 652	2	7.38	1.39	$ 8.77	
[redacted]					
[redacted]-4030 051	3	7.38	2.78	$ 10.16	
[redacted]-5378 988	1	7.38	0	$ 7.38	
[redacted]-7522 242	3	7.38	2.78	$ 10.16	
[redacted]-8768 664	3	7.38	2.78	$ 10.16	
[redacted]					
[redacted]-5508 601	3	7.38	2.78	$ 10.16	
[redacted]					
[redacted]-6395 999	1	7.38	0	$ 7.38	
[redacted]-8831 392	2	7.38	1.39	$ 8.77	
[redacted]-0343 163	3	7.38	2.78	$ 10.16	
[redacted]-2458 025	1	7.38	0	$ 7.38	
[redacted]-3102 911	2	7.38	1.39	$ 8.77	
[redacted]-3103 806	4	7.38	4.17	$ 11.55	
[redacted]-3272 675	4	7.38	4.17	$ 11.55	
[redacted]					
[redacted]-2002 683	4	7.38	4.17	$ 11.55	
[redacted]-8377 891	5	7.38	5.56	$ 12.94	
[redacted]-0366 832	3	7.38	2.78	$ 10.16	

[redacted]-0499 048	2	7.38	1.39	$ 8.77	
[redacted]-6332 699	1	7.38	0	$ 7.38	
[redacted]-0069 358	2	7.38	1.39	$ 8.77	
[redacted]-0625 676	1	7.38	0	$ 7.38	
[redacted]-2000 918	3	7.38	2.78	$ 10.16	
[redacted]					
[redacted]-3312 492	7	7.38	6.34	$ 15.72	
[redacted]-3540 079	2	7.38	1.39	$ 8.77	
[redacted]-3698 345	1	7.38	0	$ 7.38	
[redacted]-3836 553	2	7.38	1.39	$ 8.77	
[redacted]-8297 193	2	7.38	1.39	$ 8.77	
[redacted]-9610 840	2	7.38	1.39	$ 8.77	
[redacted]-9738 365	3	7.38	2.78	$ 10.16	
[redacted]-9804 184	1	7.38	0	$ 7.38	
[redacted]-9088 888	3	7.38	2.78	$ 10.16	
[redacted]-0648 765	6	7.38	6.95	$ 14.33	
[redacted]-2632 996	1	7.38	0	$ 7.38	
[redacted]					
[redacted]-9500 717	4	7.38	4.17	$ 11.55	
[redacted]-1222 761	10	7.38	12.51	$ 19.89	
[redacted]-2851 993	1	7.38	0	$ 7.38	
[redacted]-6128 151	1	7.38	0	$ 7.38	
[redacted]					
[redacted]-6464 066	2	7.38	1.39	$ 8.77	
[redacted]-1648 596	2	7.38	1.39	$ 8.77	
Grand Totals	161	$ 479.70	$ 133.44	$ 613.14	$ 61.71

Summary Account L[redacted]6851-110M - Adjustments on Apr 28, 2001 Bill

First Line	NAME	U5R	Additional Line	U5RAX	PORXX	PRORATE	CALLS	CLTs	ITC	TOTAL
[redacted]2-2023	[redacted]	26.86			0.43	1.82		4.91	7.38	41.40
[redacted]-3236	[redacted]	26.86			0.43	1.82		4.91	7.38	41.40
[redacted]-2172	[redacted]	26.86			0.43	6.37			7.38	150.09
			[redacted]-2173	26.86	0.43	6.37			1.39	
			[redacted]-2174	26.86	0.43	6.37			1.39	
			[redacted]-2175	26.86	0.43	6.37			1.39	
	5- DA Calls @ .78						3.90			
[redacted]-1483	[redacted]	26.86			0.43	10.92			7.38	86.75
			[redacted]-1484	26.86	0.43	10.92			1.39	
	2- DA Calls @.78						1.56			
[redacted]-8124	[redacted]	26.86			0.43	6.37			7.38	77.63
			[redacted]-8064	26.86	0.43	6.37			1.39	
	2- Calls (3 Way + Last Call Rein @.77)						1.54			
[redacted]-9101	[redacted]	26.86			0.43	6.37		14.73	7.38	129.31
			[redacted]-9102	26.86	0.43	6.37			1.39	
			[redacted]-2517	26.86	0.43	6.37			1.39	
	3-CLTs Prorated Chrgs							3.44		
[redacted]-6074	[redacted]	26.86			0.43	1.82			7.38	66.99
			[redacted]-7972	26.86	0.43	1.82			1.39	
[redacted]-7160	[redacted]	26.86			0.43	6.37		4.91	7.38	82.15
			[redacted]-1627	26.86	0.43	6.37			1.39	
	1-CLT Prorated Chrg							1.15		
[redacted]-3080	[redacted]	26.86			0.43	2.73			7.38	163.04
			[redacted]-3098	26.86	0.43	2.73			1.39	
			[redacted]-3173	26.86	0.43	2.73			1.39	
			[redacted]-3178	26.86	0.43	2.73			1.39	
			[redacted]-3260	26.86	0.43	2.73			1.39	
[redacted]-0015	[redacted]	26.86			0.43	1.82			7.38	97.49
			[redacted]-0019	26.86	0.43	1.82			1.39	
			[redacted]-0357	26.86	0.43	1.82			1.39	
[redacted]-0471	[redacted]	(service from 4/20/2001 - 4/26/2001)				5.46			7.38	12.84
[redacted]-6592	[redacted]	26.86			0.43	6.37			7.38	41.04
[redacted]-6350	[redacted]	26.86			0.43	1.82			7.38	66.99
	[redacted]		[redacted]-6351	26.86	0.43	1.82			1.39	
TOTAL		322.32		429.76	12.04	133.77		34.05	118.18	1,057.12

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208 B11-3301 885	Line charges	USR	USRAX	Wrong Rate	Correct Rate	Difference
sub-accounts	# OF LINES	1st line @ $40.45	Add line @ $40.45	Total Credit	Total Debit	Total Credit
[redacted]-0106 033	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-2023 258	1	$ 40.45	$ 40.45	$ 80.90	$ 26.86	$ 54.04
[redacted]-3676 199	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
[redacted]-5632 181	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
[redacted]-7800 927	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]						
[redacted]-0700 042	4	$ 40.45	$ 121.35	$ 161.80	$ 107.44	$ 54.36
[redacted]-3236 281	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]						
[redacted]-7565 818	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
[redacted]-0252 529	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]-8328 296	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-0200 485	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-2273 105	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-1483 842	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
[redacted]-4030 051	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]-3376 999	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-8788 864	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]-9101 768	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]-5506 601	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]-8074 933	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
[redacted]						
[redacted]-0343 189	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]						
[redacted]-3102 911	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
[redacted]-3103 806	4	$ 40.45	$ 121.35	$ 161.80	$ 107.44	$ 54.36
[redacted]-3272 875	4	$ 40.45	$ 121.35	$ 161.80	$ 107.44	$ 54.36
[redacted]-7160 784	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
[redacted]-8377 891	5	$ 40.45	$ 161.80	$ 202.25	$ 134.30	$ 67.95
[redacted]-9368 632	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]-6332 699	1	$ 40.45		$ 40.45	$ 26.86	$ 13.59
[redacted]-0069 358	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
[redacted]-0825 876	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-2000 918	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]-3080 795	5	$ 40.45	$ 161.80	$ 202.25	$ 134.30	$ 67.95
[redacted]-3912 492	7	$ 40.45	$ 242.70	$ 283.15	$ 188.02	$ 95.13
[redacted]-3696 345	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-9610 840	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
[redacted]-9736 365	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]-9804 184	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-9088 888	3	$ 40.45	$ 80.90	$ 121.35	$ 80.58	$ 40.77
[redacted]-0846 765	6	$ 40.45	$ 202.25	$ 242.70	$ 161.16	$ 81.54
[redacted]-2832 996	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-6592 845	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-9500 717	4	$ 40.45	$ 121.35	$ 161.80	$ 107.44	$ 54.36
[redacted]-1222 761	10	$ 40.45	$ 364.05	$ 404.50	$ 268.60	$ 135.90
[redacted]-2851 993	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-6128 151	1	$ 40.45	$ -	$ 40.45	$ 26.86	$ 13.59
[redacted]-6350 737	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
[redacted]-6464 065	2	$ 40.45	$ 40.45	$ 80.90	$ 53.72	$ 27.18
Grand Totals	123	$ 1,968.14	$ 2,393.30	$ 4,951.44	$3,303.78	$ 1,667.66

CLT's	Adjustments
[redacted]-9584	$ 9.81
[redacted]-3272	$ 19.62
[redacted]-7160	$ 9.81
[redacted]-8377	$ 9.81
[redacted]-9500	$ 9.81
[redacted]-2023	$ 9.81
[redacted]-0252	$ 39.24
[redacted]-4030	$ 9.81
[redacted]-9101	$ 29.43
Total Adjustments on CLTs	$ 147.15

Long Distance Chrgs	Adjustments
[redacted]-5506	$ 3.20

[redacted]-6074		$ 0.32				
[redacted]-0345		$ 1.91				
[redacted]-3272		$ 0.32				
[redacted]-2002		$ 0.32				
[redacted]-9271		$ 1.28				
[redacted]-3840		$ 5.47				
[redacted]-6626		$ 0.96				
[redacted]-2061		$ 6.40				
Total Adjustments on LD Calls		$ 20.18				
Please advise on how to Change sub-account names to customer name.						
These are appearing as [redacted] as the sub-account names.						
		Sub-Account BN1/ BN2				
[redacted]-3312		[redacted]				
		[redacted]				
[redacted]-6582		[redacted]				
		[redacted]				
[redacted]-5350		[redacted]				
[redacted]-2061		[redacted]				
		[redacted]				
[redacted]-1355		[redacted]				
[redacted]-1483		[redacted]				
[redacted]-3101		[redacted]				

UNE disputes

SO#	PON#	DATE	SERVICE NUMBER	AMT of DISP	PG #	DESCRIPTION / ORGINIAL SO #
(XXX)XXX-3036 006				0.77		Federal Tax
				1.83		State Tax
				2.60		
(XXX)XXX-1116 005						
See list to the right				5.60		20 OTNBX @ 27.86 - per Interconnect, s/b 27.58
See list to the right				0.62		2 OTNPX @ 46.72 - per Interconnect, s/b 46.10
				6.22		
(XXX)XXX-3355 086	Rates based on 11/07/01 Interconnect					
90652965	1142032900	3182002	XXXW361962	13.36		Coord install w/o testing - 1st loop s/b 97.97
90652966 - 68	1142032900	3182002	XXXW361963 - 65	26.67		Coord install w/o testing - add'l loops s/b 85.42
90662270	1138632200	3182002	XXXW361966	13.36		Coord install w/o testing - 1st loop s/b 97.97
90662271	1138632200	3182002	XXXW361967	8.89		Coord install w/o testing - add'l loops s/b 85.42
94634201 & 2	1150860500	4032002	XXXW031772 & 900	40.20		Coord install w/ testing - add'l loops s/b 141.71
94177445 - 48	1149819400	4012002	XXXW081763 - 66	80.40		Coord install w/ testing - add'l loops s/b 141.71
10570297	1138611100	3182002	XXXW361907	20.10		Coord install w/ testing - add'l loops s/b 141.71
90793673 & 74	1148106000	3282002	XXXW362082 & 83	40.20		Coord install w/ testing - add'l loops s/b 141.71
10570311	1138654300	3182002	XXXW361909	20.10		Coord install w/ testing - add'l loops s/b 141.71
90812585	1149192800	3292002	XXXW360255	20.10		Coord install w/ testing - add'l loops s/b 141.71
10810313	1149157200	3292002	XXXW362102	20.10		Coord install w/ testing - add'l loops s/b 141.71
10570290	1138536100	3182002	XXXW361903	13.36		Coord install w/o testing - 1st loop s/b 97.97
10570291	1138536100	3182002	XXXW361904	8.89		Coord install w/o testing - add'l loops s/b 85.42
10500027	1134825000	3182002	XXXW361779	13.36		Coord install w/o testing - 1st loop s/b 97.97
10500028 & 29	1134825000	3182002	XXXW361780 & 81	94.31		Coord install w/o testing - add'l loops s/b 85.42
90711287	1144252400	3192002	XXXW362018	13.36		Coord install w/o testing - 1st loop s/b 97.97
90711288 & 89	1144252400	3192002	XXXW362019 & 20	17.78		Coord install w/o testing - add'l loops s/b 85.42
90640854	1141015300	3122002	XXXXW301042	20.10		Coord install w/ testing - add'l loops s/b 141.71
90572782	1138640300	3182002	XXXW361910	13.36		Coord install w/o testing - 1st loop s/b 97.97
90572783	1138640300	3182002	XXXW361911	8.89		Coord install w/o testing - add'l loops s/b 85.42
10770117	1146903600	3262002	XXXW362064	13.36		Coord install w/o testing - 1st loop s/b 97.97
10770118 - 21	1146903600	3262002	XXXW362065 - 68	35.56		Coord install w/o testing - add'l loops s/b 85.42
10800142 - 51	1148623600	3292002	XXXW362088 - 97	201.00		Coord install w/ testing - add'l loops s/b 141.71
90784969 - 71	1147130900	3262002	XXXW362070 - 72	60.30		Coord install w/ testing - add'l loops s/b 141.71
10800160 & 61	1148688700	3292002	XXXW361267 & 68	40.20		
				857.31		
(XXX)XXX-3040 201						
94629026 thru 31	1142567900	3142002	XXXW141436	850.26		Ovation NRCs for add'l lines s/b no chrg - See 94629025
90662524 thru 27	1142349500	3142002	XXXW153023	566.84		Ovation NRCs for add'l lines s/b no chrg - See 90662523
90672994 thru 98	1143066600	3152002	XXXXW023165	708.55		Ovation NRCs for add'l lines s/b no chrg - See 90672993
90641405 thru 13	1141241100	3132002	XXXXW896938	1275.39		Ovation NRCs for add'l lines s/b no chrg - See 90641404
94626942 thru 52	1139203700	3082002	XXXW180709	1842.23		Ovation NRCs for add'l lines s/b no chrg - See 94626941
94627773	1140648900	3122002	XXXXW750206	141.71		Ovation NRCs for add'l lines s/b no chrg - See 94627772
90652708 thru 10	1141994800	3142002	XXXXW023154	425.13		Ovation NRCs for add'l lines s/b no chrg - See 90652707
94629205	1142924100	3152002	XXXW150471	141.71		Ovation NRCs for add'l lines s/b no chrg - See 94629204
90661048 & 49	1142238500	3142002	XXXXW714348	283.42		Ovation NRCs for add'l lines s/b no chrg - See 90661047
90632154 thru 58	1140882500	3122002	XXXXW023085	708.55		Ovation NRCs for add'l lines s/b no chrg - See 90632153
94169725 & 26	1137651100	3132002	XXXXW760775	200.00		Triple-billed VT6DC - See 94169724
90724397 thru 401	1144639000	3282002	XXXXW897004	11.90		Ovation NRCs for add'l lines s/b no chrg - See 90731927
94173561	1143842300	3202002	XXXXW301127	141.71		Ovation NRCs for add'l lines s/b no chrg - See 94173560
90651978 thru 83	1141777500	3132002	XXXXW400036	850.26		
				8147.66		

(XXX)XXX-3077 166						
N90651955 & 56	1141714300	3142002	XXXXW023139	283.42		Ovation NRCs for add'l lines s/b no chrg - See N90651954
N94630504	1142347600	3202002	XXXXW704092	141.71		Ovation NRCs for add'l lines s/b no chrg - See N94630503
				425.13		
(XXX)XXX-0388 852						
81160282			XXXT303376444	0.14		1 OTNBX @ 27.86 - per Interconnect, s/b 27.72
81426840			XXXT304145168	0.14		1 OTNBX @ 27.86 - per Interconnect, s/b 27.72
81505134			XXXT031333167	0.14		1 OTNBX @ 27.86 - per Interconnect, s/b 27.72
81519344			XXXT030118103	0.14		1 OTNBX @ 27.86 - per Interconnect, s/b 27.72
81916394			XXXT032128513	0.14		1 OTNBX @ 27.86 - per Interconnect, s/b 27.72
82239346			XXXT020978781	0.27		1 OTNOX @ 37.29 - per Interconnect, s/b 37.02
				0.97		
(XXX)XXX-3434 813						
80340086	1140958100	3152002	XXX5470094086 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
80611593	1142289100	3142002	XXX5420653593 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
76723258	1146082100	3252002	XXXX2871047258 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
76723351	1146140500	3252002	XXXX2871057351 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
77052651	1146160800	3252002	XXXX2871060651 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
77052692	1146185100	3252002	XXXX2871062692 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
77052697	1146185500	3252002	XXXX2871065697 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
81984379	1146222900	4022002	XXXX2871132379 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
77052838	1146248200	3252002	XXXX2871085838 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
77858097	1148694500	3282002	XXXX3681650097 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
				209.20		
(XXX)XXX-3740 111						
71649122	1096539100	12112001	XXX5760194882 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
82250742	TIC303G493118	2212002	XXXX6493118822 K	88.12		Dbl- billed for a VT6DM - also see 81707831, same PON#
7194712261264 K				0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
7194713108506 K				0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
3031113740111 K				0.2		EMER SRVC TEL CHRG UTAH POISON CNTRL CENTER
7194712261264 K				0.5		STATE EXTENDED 911 CHARGES
7194713108506 K				0.5		STATE EXTENDED 911 CHARGES
7194713108506 K				6.73		UNIVERSAL SERVICE FUND - USAGE
7194712261264 K				7.5		UNIVERSAL SERVICE FUND - USAGE
7194713108506 K				17.03		TOTAL TAXES
7194712261264 K				18.96		TOTAL TAXES
				109.04		
(XXX)XXX-2135 044						
N10710072 & 73	1144377700	3212002	XXXXW025144	167.64		NRC on add'l lines s/b 133.23 - See N10710071 - same PON#
				167.64		
(XXX)XXX-3851 820						
77878700	1138255900	3072002	XXX4661262700 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
77263929	1139197100	3072002	XXX4661289929 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
76216717	1140377400	3112002	XXX4540423717 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
76717388	1142989100	3182002	XXX3620XXX388 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
76717537	1143096700	3182002	XXX3620210537 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
77047214	1143316000	3182002	XXX3310209214 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
72090554	1143316000	3182002	XXX3850013554 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
76722020	1143326000	3212002	XXX3310230020 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
76718404	1143616200	3262002	XXX3310211404 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
77047606	1143621200	3182002	XXX3310212606 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
77048478	1144114200	3192002	XXX3310216478 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
77048594	1144172200	3192002	XXXX3620211594 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48

	80664636	1144641200	3202002	XXXX4661323636 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	76721592	1145264300	3212002	XXXX4661329592 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	76723111	1145948900	3222002	XXXX3310243111 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	76723085	1145986300	3292002	XXXX3310241085 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77053582	1146527000	3292002	XXXX4661333582 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77521829	1146527200	3292002	XXXX4661336829 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77053826	1146677400	3292002	XXXX3310250826 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	81463673	1147043200	3262002	XXXX4661337673 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77054834	1147072000	3262002	XXXX3310264834 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77055036	1147227800	4012002	XXXX3620212036 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77055169	1147278200	4012002	XXXX3620215169 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77055303	1147330700	4012002	XXXX3310267303 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	81524522	1147481900	4052002	XXXX4540434522 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	81523288	1147485600	4052002	XXXX4540430288 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77858782	1148975500	4012002	XXXX3310293782 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77858842	1149012600	4022002	XXXX3310295842 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	81775534	1149086600	4012002	XXXX3310299534 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77859227	1149186400	4022002	XXXX4540448227 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77529643	1149876500	4032002	XXXX9390322643 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
	77529998	1150000300	4032002	XXXX4540452998 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
					748.16		
	(XXX3XXX-3630 829						
	75906239	1138923600	3112002	XXXX2200151239 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	75905244	1138417600	3112002	XXXX2770848244 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	75906897	1139280300	3072002	XXXX4417950897 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	77047770	1143649300	3252002	XXXX6914745770 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	75904946	1138259300	3112002	XXX2240361946 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	75905551	1138601600	3112002	XXX2240372551 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80317488	1140807700	3112002	XXX5420559488 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80322720	1140832300	3112002	XXX5420573720 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80324698	1140240200	3112002	XXX5420580698 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	76715048	1141740600	3142002	XXX5420593048 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80521807	1141712300	3132002	XXX5420600807 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80533574	1141847200	3142002	XXX5420604574 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80540137	1141900700	3132002	XXX5420611137 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	76715528	1141940700	3132002	XXX5420617528 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80546644	1141959100	3132002	XXX5420625644 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80552993	1141964200	3132002	XXX5420630993 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80552998	11420543	3132002	XXX5420634998 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80552384	1141962700	3142002	XXX5420639384 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80602886	1141647200	3142002	XXX5420643886 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80609992	1142269900	3142002	XXX5420649992 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80621092	1142343300	3142002	XXX5420658092 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	77263998	1142608400	3152002	XXX5420664998 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80716728	1142784700	3152002	XXX5420678728 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80730287	1142339400	3142002	XXX5420688287 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80759048	1142769500	3152002	XXX5420693048 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80664613	1142874400	3212002	XXX5420701613 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80949569	1144143600	3202002	XXX5420708569 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	81057214	1144830900	3212002	XXX5420722214 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80135100	1140857700	3142002	XXX5470084100 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80344291	1140902400	3122002	XXX5470100291 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	76221550	1142522500	4012002	XXX5470137550 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80738653	1143075800	3192002	XXX5470156653 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	77062406	1142978500	3272002	XXX5470190406 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80819784	1141632100	3202002	XXX5610092784 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	76215529	1139755300	3072002	XXX5610097529 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	76215636	1139808400	3072002	XXX5610110636 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80135081	1139780600	3082002	XXX5610117081 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	75908606	1140257400	3122002	XXX5610126606 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	76216527	1140294300	3082002	XXX5610130527 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	76216555	1140304600	3112002	XXX5610134555 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line

	80214813	1140312800	3082002	XXX5610139813 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80135088	1140400200	3082002	XXX5610153088 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80268975	1139830800	3112002	XXX5610157975 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	76217963	1140930000	3112002	XXX5610162963 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	76218037	1140960800	3112002	XXX5610170037 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80135106	1140945500	3112002	XXX5610173106 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	76219925	1141208000	3202002	XXX5610189925 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	75647338	1141594400	3142002	XXX5610195338 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80604424	1140214400	3182002	XXX5610198424 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	80097796	1139218100	3072002	XXX5761150796 K	20.92		Per 11/01 Interconnect, Coord install w/o testing s/b 99.35 for 1st line
	81701258	TIC303E262302	2172002	XXXX4262302505 K	88.12		Dbl- billed for a VT6DM - also see 81701251, same PON#
	82474309	TIC303F349047	3012002	XXXX5349047180 K	88.12		Dbl- billed for a VT6DM - also see 82593631, same PON#
	82271264	TIC303G956364	2262002	XXXX6956364225 K	88.12		Dbl- billed for a VT6DM - also see 82275207, same PON#
	82843376	TIC719C240299	3052002	XXX2240299924 K	88.12		Dbl- billed for a VT6DM - also see 82258282, same PON#
				XXXX2200049005 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949539858 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949540859 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949613655 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949614656 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949615657 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949616658 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949745544 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949746545 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949747546 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949748547 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949749548 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949750549 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949751550 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949752551 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949753552 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949754553 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949755554 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949756555 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949757556 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949758557 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949759558 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949760559 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949761560 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949762561 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949763562 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949764563 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949765564 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949766565 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949767566 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949768567 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX6949769568 K	0.1		COMMUNICATIONS IMPAIRED ACT SURCHARGE
				XXXX1113630829 K	3.2		EMER SRVC TEL CHRG UTAH POISON CNTRL CENTER
				XXXX2200049005 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949539858 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949540859 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949613655 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949614656 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949615657 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949616658 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949745544 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949746545 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949747546 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949748547 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949749548 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949750549 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949751550 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949752551 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949753552 K	0.43		STATE EXTENDED 911 CHARGES
				XXXX6949754553 K	0.43		STATE EXTENDED 911 CHARGES

				XXXX6949755554 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949756555 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949757556 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949758557 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949759558 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949760559 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949761560 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949762561 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949763562 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949764563 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949765564 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949766565 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949767566 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949768567 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX6949769568 K	0.43		STATE EXTENDED 911 CHARGES	
				XXXX2200049005 K	1.39		TOTAL TAXES	
				XXXX6949539858 K	1.39		TOTAL TAXES	
				XXXX6949540859 K	1.39		TOTAL TAXES	
				XXXX6949613655 K	1.39		TOTAL TAXES	
				XXXX6949614656 K	1.39		TOTAL TAXES	
				XXXX6949615657 K	1.39		TOTAL TAXES	
				XXXX6949616658 K	1.39		TOTAL TAXES	
				XXXX6949745544 K	1.39		TOTAL TAXES	
				XXXX6949746545 K	1.39		TOTAL TAXES	
				XXXX6949747546 K	1.39		TOTAL TAXES	
				XXXX6949748547 K	1.39		TOTAL TAXES	
				XXXX6949749548 K	1.39		TOTAL TAXES	
				XXXX6949750549 K	1.39		TOTAL TAXES	
				XXXX6949751550 K	1.39		TOTAL TAXES	
				XXXX6949752551 K	1.39		TOTAL TAXES	
				XXXX6949753552 K	1.39		TOTAL TAXES	
				XXXX6949754553 K	1.39		TOTAL TAXES	
				XXXX6949755554 K	1.39		TOTAL TAXES	
				XXXX6949756555 K	1.39		TOTAL TAXES	
				XXXX6949757556 K	1.39		TOTAL TAXES	
				XXXX6949758557 K	1.39		TOTAL TAXES	
				XXXX6949759558 K	1.39		TOTAL TAXES	
				XXXX6949760559 K	1.39		TOTAL TAXES	
				XXXX6949761560 K	1.39		TOTAL TAXES	
				XXXX6949762561 K	1.39		TOTAL TAXES	
				XXXX6949763562 K	1.39		TOTAL TAXES	
				XXXX6949764563 K	1.39		TOTAL TAXES	
				XXXX6949765564 K	1.39		TOTAL TAXES	
				XXXX6949766565 K	1.39		TOTAL TAXES	
				XXXX6949767566 K	1.39		TOTAL TAXES	
				XXXX6949768567 K	1.39		TOTAL TAXES	
				XXXX6949769568 K	1.39		TOTAL TAXES	
				XXXX2200049005 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949539858 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949540859 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949613655 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949614656 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949615657 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949616658 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949745544 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949746545 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949747546 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949748547 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949749548 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949750549 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949751550 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949752551 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949753552 K	0.57		UNIVERSAL SERVICE FUND - USAGE	
				XXXX6949754553 K	0.57		UNIVERSAL SERVICE FUND - USAGE	

			XXXX6949755554 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949756555 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949757556 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949758557 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949759558 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949760559 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949761560 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949762561 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949763562 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949764563 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949765564 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949766565 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949767566 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949768567 K	0.57		UNIVERSAL SERVICE FUND - USAGE
			XXXX6949769568 K	0.57		UNIVERSAL SERVICE FUND - USAGE
				1481.36		
XXX)XXX-3850 128						
82253843	TIC303G954870	2212002	XXXX6954870690 K	88.12		Dbl- billed for a VT6DM - also see 82080047, same PON#
				88.12		
(XXX)XXX-5585 869						
			XXXX2422594123 J	0.21		COMMUNICATIONS IMPAIRED ACT SURCHARGE
			XXXX2422595124 J	0.21		COMMUNICATIONS IMPAIRED ACT SURCHARGE
			XXXX2422596125 J	0.21		COMMUNICATIONS IMPAIRED ACT SURCHARGE
			XXXX2422597126 J	0.21		COMMUNICATIONS IMPAIRED ACT SURCHARGE
			XXXX2422598127 J	0.21		COMMUNICATIONS IMPAIRED ACT SURCHARGE
			XXXX1115585869 J	1.05		EMER SRVC TEL CHRG UTAH POISON CNTRL CENTER
			XXXX2422594123 J	0.37		STATE EXTENDED 911 CHARGES
			XXXX2422595124 J	0.37		STATE EXTENDED 911 CHARGES
			XXXX2422596125 J	0.37		STATE EXTENDED 911 CHARGES
			XXXX2422597126 J	0.37		STATE EXTENDED 911 CHARGES
			XXXX2422598127 J	0.37		STATE EXTENDED 911 CHARGES
			XXXX2422594123 J	0.01		UNIVERSAL SERVICE FUND - USAGE
			XXXX2422595124 J	0.01		UNIVERSAL SERVICE FUND - USAGE
			XXXX2422596125 J	0.01		UNIVERSAL SERVICE FUND - USAGE
			XXXX2422597126 J	0.01		UNIVERSAL SERVICE FUND - USAGE
			XXXX2422598127 J	0.01		UNIVERSAL SERVICE FUND - USAGE
				4.00		
(XXX)XXX-6853 131	**XXXXXX4043093 3 - CLEC, in our system we reflect this line as a 1FB, Qwest is billing it as a measured loop (U5R). Could you check on this one?**					
76717619	1142778300	3152002	XXX4660461952 L	23.38		per 03/26/01 Interconnect, coord w/o testing, 1st line s/b 95.48
			XXX1116853131 L	13.8		Federal Universal Serv Fund Private Line at 6.6827%
			XXX8880271125 L	13.8		Federal Universal Serv Fund Private Line at 6.6827%
			XXX8880271125 L	0.75		STATE EXTENDED 911 CHARGES
			XXX8880271125 L	0.08		TELEPHONE ASSISTANCE PLAN SURCHARGE
			XXX8880271125 L	0.15		UNIVERSAL SERVICE FUND - USAGE
				51.96		
			Grand Total	**12,299.37**		

Reply Exhibit CLD-31

DA Charges On Accounts With Dial-Lock Feature

RESALE BTN	End User Name	Bill Date	Amount Disputed	Cause of Dispute	Account Number	Credit Issued (Mark with X)	Notes
(XXX) X95-2354	X, VICKI	5/10/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X32-0309	X, DENENE	5/10/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X32-1930	X, SAM	5/10/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	Discd
(XXX) X32-5393	X, SCOTTIZE	5/16/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X87-5881	X, FLORENCE	5/7/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X87-5907	X, TAMMI C	5/7/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X38-4330	X, LATASHA	5/13/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X62-2477	X, THERESA	5/10/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X73-1462	X, APRIL	5/7/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X58-9827	X, MICHELLE A	5/7/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X33-0125	X, CARLISA	5/19/2002	$3.15	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X53-2781	X, JOYCE	5/10/2002	$9.54	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X34-0886	X, LISA	5/16/2002	$3.18	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X46-0517	X, MARY	5/16/2002	$2.12	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X59-8634	X, REGINA	5/4/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X74-2291	X, SHAWNA	5/16/2002	$6.36	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X51-0577	X, SHERRY	5/10/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X51-2920	X, WINDY	5/10/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X53-1153	X, EDD	5/25/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X53-4166	X, CHRISTINE	5/25/2002	$2.12	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX)X55-1873	X, JOHNATHAN	5/4/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X55-4109	X, CARRETHA	5/4/2002	$15.90	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X55-7905	X, MARIA	5/4/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X55-8483	X, MICHELE	5/4/2002	$3.18	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X94-1261	X, MARCIA	5/25/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X96-6114	X, ALAN	5/10/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X96-6114	X, ALAN	5/10/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X51-6524	X, SHERRY	5/13/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X53-5932	X, DORA	5/28/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X21-9363	X, SHERRY A	5/25/2002	$2.12	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X27-6506	X, SHERYL	5/10/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X53-9489	X, DOUGLAS	5/1/2002	$1.06	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X43-1702	X, MICHELLE	5/4/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X65-3006	X, WILLIAM	5/10/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X65-4054	X, VANYA	5/10/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X77-4680	X, DEBRA	5/16/2002	$2.52	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X77-4709	X, JIM	5/16/2002	$6.93	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X80-1937	X, ROCHELLE	5/25/2002	$1.89	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X82-3208	X, TODD	5/13/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X88-4339	X, MARY	5/16/2002	$8.82	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X88-8901	X, STEPHANIE	5/16/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X92-4784	X, MICHAEL	5/22/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X57-8913	X, JON	5/13/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X62-2097	X, MISTY	5/4/2002	$5.04	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X89-0558	X, STEVEN	5/19/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	

(XXX) X63-0906	X, JOHN	5/7/2002	$1.89	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	OC4 not available Reply Exhibit CLD-31
(XXX) X63-3551	X, WILLIE LEE	5/7/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X56-1829	X, MELISSA	5/7/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X82-4507	X, KENT	5/1/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X82-5610	X, MARGARET	5/10/2002	$2.52	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X48-6689	X, ANGIE	5/13/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X82-1646	X, TERESA	5/22/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X82-9661	X, TAMMY	5/28/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X82-9839	X, TERRI	5/28/2002	$3.15	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X83-1122	X, JANET	5/22/2002	$1.89	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X84-2168	X, TERA A	5/7/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X84-5409	X, REBECCA	5/7/2002	$2.52	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X53-1069	X, AMANDA	5/13/2002	$1.89	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X44-0397	X, CEDRIC	5/7/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X87-3976	X, JULIANNA	5/10/2002	$1.35	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X52-0690	X, ALICE MARIE	5/19/2002	$1.89	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X52-9714	X, JOANN	5/19/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X55-2516	X, HOWARD	5/4/2002	$15.12	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X55-3414	X, JANET	5/4/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X55-7779	X, YULONDA	5/4/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X58-4056	X, TINA	5/25/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X22-4719	X, JERRY	5/28/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X28-7461	X, TRACEY	5/22/2002	$1.26	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X66-4558	X, RICHARD	5/22/2002	$1.89	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X66-5720	X, DIANE	5/22/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) X88-0948	X, KIM	5/16/2002	$1.89	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
(XXX) 527-3327	X, MONICA	5/22/2002	$0.63	DIRECTORY ASSISTANCE CHARGES	REDACTED	x	
DISPUTE TOTAL			**$153.32**				

broad:margin Testimonial

"Ted Bailey" <tbailey@broadmargin.com> on 07/26/2002 04:57:32 PM

To: "Pam Delaittre" <pdelait@qwest.com>
cc: "Vernon Starr" <vstarr@broadmargin.com>

Subject: RE: Qwest Bill Validation for Global Crossing

Pam,

I manage the group at Broadmargin that is responsible for validating and auditing the UNE-P and Resale accounts for Global Crossing. Global Crossing receives all of the invoices electronically and forwards that information on to us. The electronic data allows us to perform more detailed audits on the invoices and provide Qwest with the relevant dispute information. The contacts that I have worked with at Qwest (Julie Tigges, Michelle West, and Eileen Milner) have been extremely helpful in resolving all dispute issues and answering any questions that I may have.

Hopefully I've answered all of your questions, and please let me know if you need any further information.

Thanks,
Ted Bailey
broad:margin
Phone: (678) 802-4162
Fax: (678) 802-4195
Email: tbailey@broadmargin.com

-----Original Message-----
From: Pam Delaittre [mailto:pdelait@qwest.com]
Sent: Friday, July 26, 2002 5:38 PM
To: tbailey@broadmargin.com
Subject: Qwest Bill Validation for Global Crossing

Ted Bailey
Broad Margin

Re: Qwest Bill Validation for Global Crossing

Dear Mr. Bailey:

Sandra Seay, Director -Vendor Relations at Global Crossing advised me to call you directly with any questions about their bill validation. Thank you for talking with me on Wednesday, July 24.

As the billing validation vendor for Global Crossing, we are very interested in your perception of the ease with which you can audit Qwest's UNE-P and Resale bills. I would appreciate it if you could confirm my understanding of our conversation and/or add your remarks.

Broad Margin receives Qwest's billing for Global Crossing via electronic files

Broad Margin validates Qwest bills for UNE-P and/or Resale services
Broad Margin is able to successfully audit/validate Global Crossing bills and provide feedback necessary to submit any appropriate disputes
Broad Margin has appropriate contacts at Qwest who can answer and resolve any questions you may have.

Thanks again for your time. I look forward to hearing from you today.

Pam DeLaittre
Director - Customer Service Operations
Qwest Wholesale Markets
(612) 663-5357
pdelait@qwest.com

Integra Telecom Testimonial

Ann Binkley <ambinkl@qwest.com> on 07/26/2002 12:25:48 PM

To: sburson@qwest.com
cc:
Subject: Integra Telecom UNE-P BANs

Sue,

I have spoken with Bill Littler and Greg Gallagher at Integra and informed them that Qwest can provide individual BANS for the UNE products. Qwest is in the process of establishing these BANS and we anticipate having them set up by August 1st.

Please let me know if you have additional questions or concerns.

Ann Binkley

-------- Original Message --------
Subject: FW: UNE-P BANs
Date: Thu, 25 Jul 2002 12:00:37 -0700
From: "Littler, Bill" <bill.littler@integratelecom.com>
To: "Ann Binkley (E-mail)" <ambinkl@qwest.com>

> -----Original Message-----
> From: Gallagher, Greg
> Sent: Wednesday, July 24, 2002 12:59 PM
> To: Littler, Bill
> Subject: UNE-P BANs
> Importance: High
>
> Bill,
>
> Integra currently receive Qwest bills via paper and BillMate media. The
> process that our systems (INCS) uses to identify circuit type is the BAN.
> For example, currently the unbundled DS1 loops are on a separate BAN from
> the unbundled DS1 EELs. Therefore it is critical that each type of
> service is billed via a specific BAN. The service type is important as
> our auditors process the bills and report to the company.
>
> Please have Qwest setup additional BANs for each state Integra has a UNE-P
> amendment.
>
> Thanks,
> Greg

IONEX Testimonial

Diana Anderson <danderson@ionex.com> on 07/24/2002 04:12:18 PM

To: "'djwhit2@qwest.com'" <djwhit2@qwest.com>
cc:
Subject: FW: une-p billing

Answers in CAPS below. Let me know if you have any other questions.

Diana,

See my answers in CAPS below.

If you have any questions or concerns on this email, please don't hesitate to contact me.

Diana-
Sorry to pester you on this, but I thought I would follow-up my VMS with a email. Could you supply me with the following information??

Does IONEX receives their UNE-P billing information manully and/or through Billmate??
IONEX USES BILLMATE JUST TO EXTRACT THE DATA FROM THE DISC. WE HAVE A PROGRAM TO PROCESS THE BILLS FROM THERE

If possible, does IONEX audit those bills through another internal billing system with the Qwest provided billing information???
IONEX DOES AUDIT THE BILLS. WE AUDIT THE MONTHLY RECURRING CHARGES AND THE
OC&C CHARGES

Please touch base with me as soon as you can.
Thanks again for the help.
Dan

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Generic Information

Document Facts

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Prerequisites

The SDC should have access to and or knowledge of the following:

- Initial Billing Training (Resale, Interconnection and Retail)
- Order issuance
- Collections Procedures
- Tariff and Contract Language
- Job Function Specific Training
- Adjustment Procedures
- Customer Contact Skills
- Basic Computer Skills

- Contract Library
- Dispute Tracking Log (currently in EXCEL format-see your manager)
- Microsoft Word/Excel
- MCCs
- CPS
- InfoBuddy

Systems

- BOSS/CARS
- Oscar
- Sopad/Solar/Rsolar
- IMA/IIS
- WFA-C

Scope of Procedure

The intent of this Process is to provide an outline for investigation and resolution to the SDC when a charge or charges have been challenged by a customer/CLEC. It is to provide assistance and instruction from the receipt of the dispute to the final resolution. This document would be used for both Wholesale and Retail accounts handled by Wholesale.

Dispute Definition

A dispute occurs when there is a disagreement between two or more parties as to the validity of a position or viewpoint. Here at Qwest, the great majority of our disputes will occur when a customer or CLEC disagrees with charges, which Qwest has billed on their statement. For example, a customer has been billed NRC (Non Recurring Charges) on a conversion order when the service already was in existence prior to the conversion. The customer contacts Qwest to dispute the billing of the NRC as an error.

Types of Disputes

This document will generally address disputes/Claims in a generic manner. In other words, regardless of the Product or Type of Service the process by which the customer/CLEC will initiate the claim, the investigation and resolution procedures will follow identical parameters. Any exceptions to a generic approach will be noted in the document where necessary.

Most frequently the disputes/claims which are initiated by your customer will encompass charges involving:

- Toll Calls
- Toll Blocking
- PIC Changes
- Pay per Use charges
- NRC
- RC

- Rates
- Balances owed

When a customer makes a claim, then we at Qwest must find the answer. Is this dispute the result of system problems, contract language disagreements, installation problems, incomplete information as provided by the Customer/CLEC on their service request, order writing errors (human) and finally customer misunderstandings or errors?

The Road to Resolution - Beginning to End

The following provides a snapshot of the various steps that might be utilized as you move from the receipt of the dispute to its resolution.

> Not all of the steps listed will apply in every dispute. It is suggested however that the SDC use this brief step by step guideline as a guide to the process flow from beginning to end.

Steps to follow – beginning to end:

- 1. Upon receipt of the written dispute, be sure that you have all necessary information required to begin an investigation (See Required from CLEC/Customer).
- 2. Verify that the dispute has not been previously addressed. (Check previous notes in BOSS/CARS and any paper or electronic files for resolved and or ongoing investigations.)
- 3.If the dispute has already been addressed notify the customer/CLEC and provide supporting documentation.
- 4. Acknowledge dispute to the customer/CLEC. (Send Acknowledgement letter) within 2 business days.
- 5. RSID/ZCID accounts only – Check the CLECs contract for specific language regarding the dispute process that may impact the investigation and resolution.
- 6 Retail – Check applicable Tariff for specific language regarding disputes that may impact the investigation and resolution.
- 7. Investigation should include all available resources:
  - InfoBuddy for Methods and Procedures
  - Applicable systems, I.E., IMA, WFA C, Oscar, BOSS, CARS
  - Other SDCs and Managers
  - CPS
  - Contracts if applicable
  - Tariff if applicable
  - Staff- Process Analysts
  - Service Managers
  - Other reports that may be created by the End User computerist
- 8. Detailed notes of each action taken in the investigation should be documented in BOSS/CARS.
- 9. Upon completion of the investigation, determine resolution and note in BOSS/CARS.
- 10. Notify customer/CLEC of results. (Send Resolution of Dispute Letter)
- 11. Issue order if appropriate or refer to provisioning contact for order issuance.

- 12. Issue adjustment if appropriate.
- 13. If decided in companies favor and charges have remained unpaid, a debit adjustment for Late Payment Charges to the customers/CLECs account will need to be issued if applicable.

  CLEC - ALWAYS REVIEW CONTRACT LANGUAGE FOR ANY SPECIFIC INSTRUCTIONS REGARDING LATE PAYMENT CHARGES

- 14. If decided in customers/CLECs favor and charges have been paid, a credit adjustment for Interest to the customers/CLECs account should be issued if applicable.

  CLEC - ALWAYS REVIEW CONTRACT LANGUAGE FOR ANY SPECIFIC INSTRUCTIONS REGARDING INTEREST CHARGES

- 15. Document all details of adjustments and orders in BOSS/CARS as well as any paper or electronic documentation that has been created as a result of the dispute.
- 16. File all back-up documentation for future reference.

Customer/CLEC Initiated Disputes

Wholesale

Wholesale customers (RSID/ZCID) are often subject to the contract provisions that are included in their negotiated contracts. The majority of these contracts contain language describing the process by which disputes are to be handled. Most of these contracts require that the CLEC pay all charges due as billed. The CLEC will be reimbursed those charges plus interest if the dispute is resolved in their favor.

Qwest expects that the CLEC will be fully aware of the agreements made in their individual contracts. However, the SDC will often need to reinforce this information with the CLEC to ensure their awareness and knowledge of the provisions of their contract.

All disputes submitted by the CLEC must be in a written format to avoid any misunderstanding as to the nature and scope of the dispute.

Qwest does not require the use of a particular "form" to submit disputes.

Qwest does require that the CLEC provide all pertinent information when the dispute is submitted or the dispute will be rejected back to the CLEC until complete information is provided.

The dispute(s) may be submitted to Qwest via the following methods:

- U.S.Mail
- Overnighted Mail
- E-Mail
- Fax

It is extremely important that the SDC be familiar with the CLECs contract guidelines regarding Payment, time frames for submitting a dispute and dispute resolution guidelines.

Required from CLEC

- CLEC Name
- Email address if applicable
- Contact Name, Telephone Number and address

- Bill Date(s) – upon which disputed item(s) appear.
- Summary Bill Account Number
- Sub Account number(s) – where disputed item(s) appear.
- Reason(s) for dispute of item(s).
- Service Order number and completion date if applicable
- Complete details of dispute:
  - Detail should be complete for item(s) in dispute, I.E. if the item is a toll call, all detail needs to be provided including: Entity billed under, dates, to number and amount of call.

Sometimes Required:

- Bill/CSR Page number

If complete information is not received see section "Verification of the Dispute".

Retail Accounts

All disputes submitted must be in a written format to avoid any misunderstanding as to the nature and scope of the dispute.

Qwest does not require the use of a particular "form" to submit disputes.

Qwest does require that all pertinent information be provided when the dispute is submitted.

The dispute(s) may be submitted to Qwest via the following methods:

- U.S.Mail
- Overnighted Mail
- E-Mail
- Fax

It is extremely important that the SDC be familiar with and consult the individual state tariff applicable to their customer for any language discussing time frames for submission and resolution of a dispute.

Required from Customer

- Customer Name
- Email address if applicable
- Contact Name, Telephone Number and address
- Bill Date(s) – upon which disputed item(s) appear.
- BTN (Billing Telephone Number)
- WTNs (Working Telephone Number) – Where disputed item(s) appear.
- Reason(s) for dispute of item(s).
- Service Order number and completion date if applicable.
- Complete details of dispute:
  - Detail should be complete for item(s) in dispute, I.E.; if the item is a toll call, all detail needs to be provided including: Entity billed under, dates, to number and amount of call.

Sometimes Required:

❖ Bill/CSR Page

If complete information is not received see section "Verification of the Dispute".

Contract Vs Tariffs

Wholesale Resale accounts are subject to contracts that are negotiated between Qwest and the Resale CLEC. These contracts will take precedence over the tariff(s) and procedures that would otherwise apply. The SDC should always refer to the individual CLECs contract for specific language regarding the handling of disputes, including time frames allowed for resolution and arbitration guidelines if needed

Retail accounts (Non RSID) accounts that are handled in Wholesale would be subject to the applicable tariffs. The SDC may need to check the tariff for any specific language regarding disputes.

Contract Language Example

Example of Contract Language (1):

27. Dispute Resolution

27.11 If any claim, controversy or dispute between the Parties, their agents, employees, officers, directors or affiliated agents ("Dispute") cannot be settled through negotiation, it may be resolved by arbitration conducted by a single arbitrator engaged in the practice of law, under the then current rules of the American Arbitration Association ("AAA"). The Federal Arbitration Act, 9 U.S.C. Secs. 1-16, not state law, shall govern the arbitrability of all Disputes. The arbitrator shall not have authority to award punitive damages. All expedited procedures prescribed by the AAA rules shall apply. The arbitrator's award shall be final and binding and may be entered in any court having jurisdiction thereof and shall be noticed to the Commission. The arbitrator shall determine which Party or Parties will bear the costs of arbitration, including apportionment, if appropriate. The arbitration shall occur in Phoenix, Arizona, and the governing law shall be in accordance with Section 21.1 above.

27.22 In the event CO-PROVIDER and Qwest are unable to agree on certain issues during the term of this Agreement, the Parties may identify such issues for arbitration before the Commission. Only those points identified by the Parties for arbitration will be submitted.

27.3 If a Dispute is submitted to arbitration pursuant to Section 27.1 above, the procedures described in this Section 27.3 shall apply, notwithstanding the then current rules of the AAA. Discovery shall be controlled by the arbitrator and shall be permitted to the extent set forth below. Each party may submit in writing to a Party, and that Party shall so respond, to an agreed amount of the following: interrogatories, demands to produce documents, and requests for admission. Not less than ten (10) days prior to the arbitration hearing, the Parties shall exchange witness and exhibit lists. Deposition discovery shall be controlled by the arbitrator. Additional discovery may be permitted upon mutual agreement of the Parties or the determination of the arbitrator. The arbitration hearing shall be commenced within thirty (30) days after a demand for arbitration by either Party and shall be held in Phoenix, Arizona. The arbitrator shall control the scheduling so as to process the matter expeditiously. The Parties may submit written briefs. The arbitrator shall rule on the dispute by issuing a written opinion within seven (7) days after the close of the hearings. The times specified in this section may be extended upon mutual agreement of the Parties or by the arbitrator upon a showing of good cause. The decision of the arbitrator shall be final and binding upon the Parties and judgment upon the award rendered by the arbitrator may be entered in a court having jurisdiction. The decision shall also be submitted to the Commission.

11.10 Payment

1 AT&T Order, p. 33 at Issue 76.

2 AT&T Order, p. 33 at Issue 76.

11.10.1 Amounts payable under this Resale Section are due and payable within thirty (30) calendar days after the bill date of Qwest's invoice. During the initial three billing cycles of this Agreement, ABC and Qwest agree that undisputed amounts shall be paid as provided herein. ABC and Qwest further agree that, during said three billing cycle period, they will cooperate to resolve amounts in dispute or billing process issues in a timely manner but no later than sixty (60) business days after the bill date of Qwest's invoice or identification and notice of the billing process issue. Disputed amounts will be paid within thirty (30) business days following resolution of the dispute.

11.10.2 After the three (3) month period outlined above, ABC will pay the bill in full within 30 calendar days after the bill date of the invoice. Billing disputes will be processed and jointly resolved. Any disputed amounts that Qwest remits to ABC will be credited on the next billing cycle including an interest credit of 1.5% per month compounded.

11.10.3 A late payment charge of 1.5% applies to all billed balances which are not paid by 30 calendar days after the bill date shown on the invoice. Qwest agrees, however, that the application of this provision will be suspended for the initial three billing cycles of this Agreement and will not apply to amounts billed during those three cycles.

11.10.4 Qwest may discontinue processing orders for the failure by ABC to make full payment for the resold services provided under this Agreement within thirty (30) calendar days of the due date on ABC's bill. Qwest agrees, however, that the application of this provision will be suspended for the initial three billing cycles of this Agreement and will not apply to amounts billed during those three cycles.

11.10.5 Qwest may disconnect for the failure by ABC to make full payment for the resold services provided under this Agreement within sixty (60) calendar days of the due date on ABC's bill. ABC will pay the Tariff charge required to reconnect each end user line disconnected pursuant to this paragraph. Qwest agrees, however, that the application of this provision will be suspended for the initial three billing cycles of this Agreement and will not apply to amounts billed during those three cycles.

11.10.6 Collection procedures and the requirements for deposit are unaffected by the application of a late payment charge.

11.10.7 Qwest shall credit ABC's account the amount due for any trouble or out-of-service conditions in the same manner that Qwest credits the accounts of its own end users and pursuant to any applicable provisions in Qwest's Tariffs. Qwest shall reflect the amount of such credits on an individual end user telephone number basis in the billing information Qwest provides ABC.

11.10.8 In the event billing disputes relate to service quality issues, the dispute shall be referred to the Qwest account executive assigned to ABC who will evaluate the facts and circumstances of the service quality issues and will work with ABC to resolve the dispute.

Example of Contract Language (2)

The contract agreement states the process for handling disputes. Please refer to the individual contract agreement for such language: Below are excerpts from the revised 2.3 contract template that may appear in your customer contract agreement. Individual contract agreements may vary slightly.

Part A paragraph 3.4.2-Payment

Should CO-PROVIDER dispute, in good faith, any portion of the monthly billing under this Agreement, CO-PROVIDER will notify Qwest in writing within thirty (30) calendar days of the receipt of such billing, identifying the amount, reason and rationale of such dispute. CO-PROVIDER shall pay all amounts due. Both CO-PROVIDER and Qwest agree to expedite the investigation of any disputed amounts in an effort to resolve and settle the dispute prior to initiating any other rights or remedies. Should the dispute be resolved in CO-PROVIDER's favor and the resolved amount did not appear as a credit on CO-PROVIDER's next invoice from Qwest, Qwest will reimburse CO-PROVIDER the resolved amount plus interest from the date of payment. The amount of interest will be calculated using the late payment factor that would have applied to such amount had it not been paid on time

Part A paragraph 3.17-Dispute Resolution

(A)3.17.1 If any claim, controversy or dispute between the Parties, their agents, employees, officers, directors or affiliated agents should arise, and the Parties do not resolve it in the ordinary course of their dealings (the "Dispute"), then it shall be resolved in accordance with the dispute resolution process set forth in this Section. Each notice of default, unless cured within the applicable cure period, shall be resolved in accordance herewith.

(A)3.17.2 At the written request of either Party, and prior to any other formal dispute resolution proceedings, each Party shall designate an officer-level employee, at no less than the vice president level, to review, meet, and negotiate, in good faith, to resolve the Dispute. The Parties intend that these negotiations be conducted by non-lawyer, business representatives, and the locations, format, frequency, duration, and conclusions of these discussions shall be at the discretion of the representatives. By mutual agreement, the representatives may use other procedures, such as mediation, to assist in these negotiations. The discussions and correspondence among the representatives for the purposes of these negotiations shall be treated as Confidential Information developed for purposes of settlement, and shall be exempt from discovery and production, and shall not be admissible in any subsequent arbitration or other proceedings without the concurrence of both of the Parties.

(A)3.17.3 If the vice-presidential level representatives have not reached a resolution of the Dispute within thirty (30)calendar days after the matter is referred to them, then either Party may demand that the Dispute be settled by arbitration. Such an arbitration proceeding shall be conducted by a single arbitrator, knowledgeable about the telecommunications industry. The arbitration proceedings shall be conducted under the then current rules of the American Arbitration Association ("AAA"). The Federal Arbitration Act, 9 U.S.C. Sections 1-16, not state law, shall govern the arbitrability of the Dispute. The arbitrator shall not have authority to award punitive damages. All expedited procedures prescribed by the AAA rules shall apply. The arbitrator's award shall be final and binding and may be entered in any court having jurisdiction thereof. Each Party shall bear its own costs and attorneys' fees, and shall share equally in the fees and expenses of the arbitrator. The arbitration proceedings shall occur in the Denver, Colorado metropolitan area. It is acknowledged that the Parties, by mutual, written agreement, may change any of these arbitration practices for a particular, some, or all Dispute(s).

(A)3.17.4 Should it become necessary to resort to court proceedings to enforce a Party's compliance with the dispute resolution process set forth herein, and the court directs or otherwise requires compliance herewith, then all of the costs and expenses, including its reasonable attorney fees, incurred by the Party requesting such enforcement shall be reimbursed by the non-complying Party to the requesting Party.

(A)3.17.5 No Dispute, regardless of the form of action, arising out of this Agreement, may be brought by either Party more than two (2) years after the cause of action accrues. Retail Resellers will be subject to the tariffs that are applicable as well as any written procedures that would apply to the handling of disputes. The SDC needs to familiarize themselves with any documentation that might impact the process

Tariff Language Example

2.4 PAYMENT ARRANGEMENTS AND CREDIT ALLOWANCES

2.4.1 PAYMENT OF RATES, CHARGES AND DEPOSITS (Cont'd)

In the event of a billing dispute, the customer must submit a documented claim for the disputed amount. If the claim is submitted within 90 days of the payment due date, any interest credits due the customer upon resolution of the dispute shall be calculated from the bill payment date. If the customer submits a claim for the disputed amount more than 90 days from the payment due date, any interest credits due the customer upon resolution of the dispute shall be calculated from the date the claim was submitted, rather than from the bill payment date. Any undisputed amounts withheld by the customer in conjunction with disputed amounts withheld shall be subject to the late payment penalty. The Company will resolve the dispute and assess interest credits or penalties to the customer as follows:

- *If the dispute is resolved in favor of the Company and the customer has paid the disputed amount on or before the payment due date, no credits or penalties will apply.*

- *If the dispute is resolved in favor of the customer and the customer has withheld the disputed amount, no credits or penalties will apply.*

• *If the dispute is resolved in favor of the customer and the customer has paid the disputed amount, the customer will receive a credit from the Company for the disputed amount times a late factor. The late factor shall be: - 0.000407 per day, compounded daily for the number of days from the date when payment was made or credit claimed, to and including the payment due date of the bill that reflects the credit for the disputed amount. In the event that the Company agrees to refund a credit by check or wire transfer, interest will be applied up to and including the date of issuance for either the check or wire transfer.*

• *If the dispute is resolved in favor of the Company and the customer has withheld the disputed amount, any payments withheld pending settlement of the dispute shall be subject to the late payment penalty as set forth in E., preceding. F. Adjustments for the quantities of services established or discontinued in any billing period beyond the minimum period set forth for services in other sections of this Price List will be prorated to the number of days or major fraction of days based on a 30 day month. The Company will, upon request and if available, furnish such detailed information as may reasonably be required for verification of any bill.*

Statute of Limitations

The Statue of Limitations identifies the time period, which can elapse before a dispute becomes void. This time frame also applies for any back billing of previously unbilled charges by Qwest.

Wholesale

The contract for the CLEC may include language that will provide for a time limit as to when the CLEC would be able to initiate a dispute. Please be sure to check the contract for this information. If no information is included a general guideline would be two years. In addition, the two-year general guideline would also apply to Qwest initiating back billing of previously unbilled charges. **However, due to the legal complexities of this issue it is recommended that you involve your manager whenever there is a question as to the viability of a dispute as well as back billing of Qwest charges.**

Retail

The Statue of Limitations differs from state to state and is controlled by the individual state Public Utility Commission through the state tariff.

The SDC will need to refer to the following UR to access the individual state tariffs for the time limits and a description of what the laws and limits apply to.

http://tariffs.uswest.com:8000/iiop/WAImap?objectid=0-2826

It is recommended that the SDC involve their manager whenever there is a question as to the viability of a dispute as well as back billing of Qwest charges.

Dispute Process

Verification of the Dispute

- Verify Dispute/Claim
  - Be sure that you have all necessary information to begin the investigation of the submitted dispute. (See required from co-Provider/Customer portion of this document)
  - If you receive a dispute with incomplete or insufficient detail a letter will need to be sent rejecting the claim (via the US Mail or Email) until all needed information is received. The time clock for

resolution of the dispute does not begin until the date that all required information has been received by Qwest.(See Acknowledgement Letter)

Time frame for resolution of dispute/claim does not begin until complete details of the dispute have been forwarded to Qwest.

Acknowledgement of the Dispute

- Acknowledge the Dispute/Claim
  - The Dispute must be acknowledged within 2 business days after Qwest has received it. **UNLESS CONTRACT LANGUAGE DIRECTS OTHERWISE.**
  - Acknowledgement will always be written in the form of a letter and can be sent via the US Mail or Email. If sent through US Mail, the SDC should utilize return receipt confirmation.
  - Please refer to the example of an Acknowledgement Letter. This letter may be altered to address individual circumstances that may need consideration.

    A dispute with incomplete or insufficient information is to be rejected back to the customer/CLEC via the Acknowledgement letter format found in this document

Acknowledgement Letter

- The Acknowledgement Letter should always include:
  - Summary Account Number/BTN
  - Sub Account number(s) – **Resale**
  - Working Telephone numbers – **Retail**
  - Assigned dispute number (if applicable)
  - Date dispute/claim received
  - Amount of each dispute listed
  - Reason for dispute/claim per the SDCs understanding
  - Name and Telephone number of SDC handling dispute/claim
  - Any other information that will help the customer reference the claim. I.E. customer designated claim number or other tracking designations.

Refer to the Acknowledgement Letter Example for further information.

Time Frames for Response and Resolution

The SDC must acknowledge receipt of the dispute/claim within 2 business days after it has been received.

The SDC will have 30 calendar days from the receipt of the dispute/claim to determine resolution.

EXCEPTIONS:

If the CLEC contract negotiated contains different time frame parameters.

OR

If different time frames are negotiated between Qwest and the CLEC/Customer and verified in writing.

Every effort should be made to complete the investigation as quickly and efficiently as is possible. However, the reality is that the investigation could conceivably take much longer to reach a resolution that is

satisfactory to both Qwest and the customer/CLEC. This could occur due to multiple departments being involved as well as many other complicating factors.

In those circumstances in which it becomes necessary to negotiate an extended time frame, the SDC should then communicate the status of the investigation on a regular basis to the customer/CLEC.

Status would be provided by:

Telephone updates to the customer/CLEC (If customer desires)

And

Written notice to the customer/CLEC verifying the status of the dispute.

The Investigation

Investigation of the dispute may involve several sources and or tools. The SDC should have a clear understanding of the dispute in order to know which source(s) would be most effective in determining the accuracy of the customer/CLECs claims.

As always each step of the investigation should be noted in detail to assist in explaining our position and proposed resolution.

- Verify that you have all information necessary to proceed.
- Verify that the bill matches the claim/dispute.
- *Determine the type of claim such as:*

Rates

The rate billed for a USOC or toll call does not agree with the customer's understanding of the correct charges.

Non Recurring Charges

These would be charges for the installation of a service, or a one time charge billed for various services such as a telephone number change or time and material charges for work done at the premise.

USOCs

There could be numerous scenarios here, the wrong USOC, whether or not the USOC applies to the service, is it a resellable USOC? Is the USOC billing the correct amount and so on.

Other

This could cover disagreements in contract or tariff language, damage claims, missed service commitments, various toll disputes, service order errors, taxes billed in errors etc.

> **The above is only a general overview of the types of claims you might receive, there are many other possibilities**

Investigative Resources

- CPS (CLEC Product Data)
- The contract for your CLEC
- WFA-C – Tester notes etc.
- Network Testers and Designers
- IMA/IIS – LSR(Local Service Request)
- View orders and previous bills and notes in OSCAR
- BOSS/CARS notes

- Methods and Procedures in InfoBuddy
- Staff – Process Analyst
- Service Managers
- Other SDCs
- MCCs (Multi Channel Communicators)
- Reports- various that could be issued by End User Computerist (contact End User Computerist for assistance)
- Tariffs
- Previous disputes

The above is not all-inclusive, depending on the type of dispute you may need to explore other options. The SDC should always refer to their manager and Process Analyst for help when they are having difficulty with an investigation

Dispute Tracking

At this time Dispute Tracking is done via spreadsheets, notes found in BOSS/CARS with supporting documentation that has been created by the SDC on paper or through a electronic source such as Word or Excel.

Dispute Database under development

The documentation created should include the information below as well as any other clarifying details.

- Bill Date Involved
- Summary Bill Account Number/BTN (Retail)
- Customer/CLEC Name (including sub account name if applicable)
- RSID/ZCID designation if applicable
- Date received by Qwest
- Date Acknowledgment of receipt sent
- Amount disputed
- Details of the dispute and investigation
- Amount Sustained
- Amount Adjusted
- Date Resolution of Dispute letter sent
- Service Order number if applicable

Resolution of Dispute

Resolution of the dispute will be determined by the results of your investigation. Several outcomes are possible, the claim may be proved valid, the claim may be shown to be unsubstantiated and denied or the claim may be found to be partially valid (e.g. we did bill charges for service not ordered but not for the time period claimed).

The investigation and ultimate resolution of a dispute demands flexibility Always be aware of the customers viewpoint, always listen to the customers concerns and make every effort to establish and maintain a good business relationship.

Always be aware that you may not have all the facts and that our billing may be in error.

If your investigation results in denial of the customers claim, always be sure to explain completely and clearly how we reached this conclusion and seek the customer's acceptance of that resolution.

If you cannot obtain the customer's acceptance of the investigative outcome, then you will need to escalate the dispute to your manager (see Dispute Escalations in this document).

> **NEVER ADJUST TO SATISFY WITHOUT THE CONCURRANCE OF YOUR MANAGER.**

Dispute Escalations

If the Customer/CLEC does not accept the results of your investigation and you are unable to reach a mutually agreeable resolution you will need to refer the dispute to your manager. All supporting documentation should be provided to your manager at the same time. The documentation should contain a detailed and concise record of the investigation, your conclusions and suggested resolution.

Complete notations regarding the escalation should be detailed on the accounts in question in the BOSS/CARS system.

Wholesale

Depending on the situation you may need to contact the Service Manager for your CLEC to assist in seeking resolution of the dispute. All supporting documentation would need to be forwarded to the assigned Service Manager.

If still unable to reach resolution and prior to a request for formal dispute proceedings, i.e., Arbitration, a written request by either party may be made requesting the assistance of an officer level employee at no less then the Vice President level to review, meet and negotiate in a good faith effort to resolve the dispute.

In the event no resolution can be achieved within 30 calendar days of this step, then either party may demand that the dispute be settled through arbitration. (See Arbitration section)

> **Please refer to the CLEC contract for your customer to determine if specific or unique requirements exist in relation to Dispute Escalations**

Retail

If the customer does not accept the proposed resolution and wishes to escalate further, you will need to refer the dispute to your manager along with all documentation of the investigation and proposed resolution.

Your manager will work with the customer and other internal departments in an attempt to reach a conclusion that is satisfactory to Qwest and the customer.

If that attempt fails, then we may begin collection procedures.

Arbitration

In the event that a dispute cannot be resolved through the dispute process, arbitration may be requested. The CLEC/customer or Qwest can make the formal request for Arbitration.

By the time the dispute has reached this point, all efforts to find a mutually agreeable resolution will have been exhausted. The SDC will have completed and documented their investigation and proposed remedies.

The attempts to find resolution will have passed from the SDC to the manager, Service Manager and finally to an officer level employee to meet and negotiate an acceptable conclusion. If still unable to reach agreement it would be at this time that the formal request for Arbitration could be made.

A single arbitrator under the current rules of the American Arbitration Association will conduct the Arbitration. The arbitrator will review the opposing positions and supporting documentation. The arbitrator's decision will be final and binding and may be entered in any court having jurisdiction.

The SDC would not generally be involved at this level. However, if the account in question is subject to Collection procedures, the SDC will need to consult their manager for guidance as to how to proceed. (See also Escrow Accounts)

> **Please refer to the *CLEC contract or applicable tariff* for your customer to determine any specific guidelines or requirements for arbitration**

Escrow Accounts

The Escrow account can only be used in the event of a dispute that has been referred to Arbitration for resolution. It is offered when the customer has refused payment and collection activity has begun as an alternative form of payment.

The request for an Escrow account must come from the Account team Vice president. It is expected that all other steps for resolution of the dispute have been exhausted.

Please refer to the method in InfoBuddy for complete information regarding this process "Method of Payment – Escrow Account".

Adjustments and Orders

Depending on the outcome of your investigation of a dispute, you may need to issue service orders, request provisioning issue service orders, issue adjustments or a combination of both.

You will also need to notify the customer/CLEC of your conclusions.

The results of your investigation should be documented and organized in an easy to understand format on paper or electronically. This documentation would serve to help support the conclusions in a discussion with the customer/CLEC as well as with others if an escalation or arbitration effort should occur.

Service Orders

As a result of your investigation to correct the bill or service involved an order may be required. This order may be issued by billing or provisioning dependent on what order type is required The type of order will be determined by what is needed to make the corrections

The following is an overview of the order types used by Qwest and briefly describes possible circumstances for their use. Currently the Billing Center only issues Record orders in most cases, Change orders, New Connects and Disconnects are handled by provisioning.

Types of orders:

Record Orders – "R" Order

Used to correct the billing records only. This type of order does not flow to any other departments. There are no corrections and updates that need to be made to other department records and there is no physical work required in the field. Most often it is used when corrections or updates need to be made to the billing section, I.E.; adding a tax exemption or the S&E section I.E., deleting a billing USOC that is not actually working on the service.

Change Orders – "C" Order

Used when physical work is required in the field such as adding or removing a service and or when downstream departments need to make updates or corrections to their records. I.E.; TIRKS records need to be corrected.

New Connects/Disconnects – "N"/"D" Order

There may be times that an N order; a D order or both may be necessary to make the corrections. This scenario is often the result of order writing errors, Zaps or other system problems.

Example:

An account is converting to Resale, and the original account should be terminated and a final statement sent. Instead we end up with two accounts with the same telephone number and different customer codes. Two bills are rendered. The correction might mean a D order would have to be issued on the original account in order to stop billing. However, we don't want to disconnect the working service either on the resold account. So we must issue the order with a remark of "Record work only, do not disconnect service" or some other remark that will make it clear to the downstream departments that we do not want this service actually disconnected and why.

Other Points to consider:

EBDs (Effective Billing Dates)

This is the date that service is to begin or stop billing. It is used when the date billing should begin or end is different from the due date/completion date.

A correct EBD is critical to ensure accurate billing. The SDC must be sure to determine that date based upon their investigation and include it on the correction order.

NRC (Non Recurring Charges)

NRC is normally billed when a new service is added or established. If a NRC was billed at the time of installation, then the SDC should negate any NRC that would bill as a result of our correction orders.

Remarks

The IRMKS section of the order should describe why the order is being issued with enough detail that anyone reviewing the order will understand the reason for issuance.

Adjustments

If an adjustment is required as part of the resolution, you will need to determine the appropriate adjustment reason depending on the type of dispute and whether it will be "to correct charges" or "Uncollectable". Information regarding adjustment reasons can be found in the following documents. Please refer to these methods for instructions on issuing the adjustment.

> **NEVER ADJUST TO SATISFY WITHOUT THE CONCURRANCE OF YOUR MANAGER.**

CENTRAL/EASTERN STATES

WESTERN STATES

Disputes/Adjustments Carrier/Retail

DMOQ Adjustments

DMOQ refers to Performance Assessments Measurements. These measurements are used to determine the quality and reliability of service provided by Qwest.

Currently, these credit adjustments are applicable only in the states of Iowa and Minnesota. The credits are available to those CLECs who have opted into the AT&T contract. The AT&T contract is the only contract where DMOQ is available at this time.

Note- Refer to Method for list of CLECs currently included.

CLECs submit claims en masse for credits from Qwest based upon our performance as is determined by the Performance Assessments Measurements found in Attachment 11 of the AT&T contract.

Performance credits apply to:

- Resale
- Unbundled Loop
- Unbundled Switching
- Dedicated Transport
- Operator Services
- Tandem Switching

Performance credits do not apply to:

- Collocation
- LNP (Local Number Portability)
- INP (Interim Number Portability)
- LIS (Local Interconnect Service)

Attachment 11

Attachment 11 outlines the performance assessment to determine the quality and reliability of the service provided by Qwest. There is always an Appendix A and in the ATX contract for Minnesota there is also an Appendix B.

Appendix A references the Per Occurrence Credits. The Per Occurrence Credit is based on the number of times a measurement is met or missed.

There are 5 categories of measurement:

- Billing
- Operator Services and CLEC Directory Assistance
- Pre-Order/Order/Provisioning and Maintenance and Repair
- Interconnection
- Unbundled Elements

Within each category, subsets focus on timeliness, accuracy and/or network quality.

The credits issued are based on calculations of one times or multiple times of:

- Recurring Charges
- Non-Recurring Charges
- Both Recurring and Non-Recurring
- Flat amount

Appendix B looks at Overall Performance Credits. The rating is based upon the Performance Index, Performance Index Ratings (PIR) and levels of compliance overall in relationship to the Direct Measures of Quality (DMOQ).

These credits are considered a penalty payment

Please refer to the method found in InfoBuddy "DMOQ Performance Assessment Measurements Credits for complete information and instructions on handling this type of dispute

Customer/CLEC Notification

When you have concluded the investigation of a dispute, you will need to determine the validity of the dispute as it was originally submitted. Once that conclusion is reached, the customer/CLEC will need to be notified. The notification must always be in writing in the form of a letter or Email. A sample of a Resolution Letter follows. The customer/CLEC may also request that the SDC call with the investigation's result, regardless the written notification is always required.

Resolution Letter

- The following information must always be provided to the customer/CLEC:
- Summary Bill Account Number or BTN (Billing Telephone Number)
- Sub Account Telephone numbers or WTN (working Telephone Numbers)
- Amounts (By the TN where disputed charges appear)
- Results of Investigation, Reasons for Conclusion, Explanation for action taken
- Time Frame – When will adjustment or order be issued. OR when will payment be due.
- To and From Dates – Period covered by adjustment or order.
- When adjustment and Interest/LPC will be applied
- SDC Name and Contact Information
- Net Amount (Total) if adjustment issued
- Service order number, due date of order
- Date resolution is to be completed and bill date will apply

Sometimes Required:

- Claim Number
- Types of Service involved
- Qwest adjustment serial number
- CSR/Bill page number

> *Be sure to check with your customer/CLEC for specific expectations and needs as far as required information needed to facilitate resolution.*

Late Payment Charges

A late payment charge will apply to any customer/CLEC when the charges due remain unpaid beyond the due date.

Wholesale

Wholesale CLECs are subject to the contracts, which they have negotiated with Qwest. Most contracts require the CLEC to pay all billed charges. If the CLEC fails to pay the billed charges within a specified time frame, (usually 30 days after the bill date) then Late Payment Charges will apply.

The Late Payment Charge percentage and when Late Payment Charges will apply can be found in each individual CLEC contract.

Refer to the CLEC contract for the guidelines on Late Payment Charges, there are frequently differences in the percentages charges and when applicable based upon the product as well as the CLEC.

Retail

Retail customers will be billed late payment charges based upon the applicable tariff. These charges will normally bill on the first bill issued after the charges become past due. There are exceptions to this, for example in Washington, late payment charges will not bill until the second bill date after the original due date. **Please be sure to check the applicable state tariff for the time frame s in which Late Payment Charges will apply as well as the percentage that will apply**

If the customer has paid the disputed amount on or before the payment due date, and the dispute is resolved in favor of Qwest then there would be no Late Payment Charge.

If the customer has withheld payment of the disputed amount and the dispute is resolved in favor of Qwest, then the disputed amount will be subject to and accessed a Late Payment Charge. This charge will be based upon a 30-day month. **Please be sure to check the applicable state tariff for specific language regarding how late payment charges will be figured.**

Further information regarding late payment charges may be found in InfoBuddy in various retail documents

Always check the applicable State Tariff

Interest

Wholesale

In the event that a CLEC has made payment for all charges included in the dispute and that dispute is resolved in the CLECs favor (credit due), Interest may be applicable.

Wholesale CLECs are subject to the contracts, which they have negotiated with Qwest. Most contracts require the CLEC to pay all billed charges. The CLEC is not to withhold payment. The CLEC should instead notify Qwest in writing of the dispute. Should the dispute be resolved in the CLECs favor then Qwest will credit the disputed amount on the CLECs next bill.

In general the interest will be calculated from the payment date of the disputed charges through the due date of the bill that reflects the credit for the disputed amount. The exception would be if the disputed amount were credited to the CLEC accounts prior to the due date of the next invoice. The interest rate is most often based upon the Late Payment Charge rate. **However the SDC should refer to the applicable CLEC contract for language specific to the CLEC involved.**

Refer to the CLEC contract for the guidelines on Late Payment Charges/Interest, there are frequently differences in the percentages charges and when applicable based upon the product as well as the CLEC.

InfoBuddy contains documentation found under Wholesale for "Interest Determination." While this documentation pertains to IABS, the SDC may find it helpful for information on the calculation of Interest it contains.

Retail

Retail customers who have paid disputed charges and then have the dispute resolved in their favor will be credited the disputed amount and paid interest by Qwest. The credit will be based upon the amount of the

dispute times a percentage. This normally will be compounded daily for the number of days from the date when payment was made to and including the payment due date of bill that will reflect the credit for the disputed amount.

> **Please refer to the applicable state tariff for specific language on the application of Interest charges and percentages**

Collections

All amounts not included in the dispute are subject to normal collection procedures.

When a dispute is resolved in the company's favor then the formerly disputed amount will become subject to collection procedures

If the dispute involves a CLEC and the CLEC refuses to accept the resolution, please consult with your manager and refer to your contract before beginning collection activities on that amount.

Dispute Retention

Retention of disputes and investigative information gathered to resolve disputes should follow the guidelines found in the Qwest Records Handling & Retention Program Guide. Currently the retention period is 2 years from the record creation. Further information his can be found through Global Village under "Administration,.Procurement and Legal," (Record Management – Sales and Service).

Any legal hold supercedes the above retention. Any records involved in litigation can not be destroyed until the litigation is completed.

Letter Examples

Acknowledgement Letter

This is an **example** of an Acknowledgement Letter; it can be **altered** to apply to either Wholesale accounts or Retail accounts handled by Wholesale.

> **This letter format is used to acknowledge receipt of a claim/dispute and or notification of rejection to the customer/CLEC of their claim/dispute for insufficient information**

Letter of Acknowledgement (Dispute Receipt)

SAMPLE LETTER

DATE

CUSTOMER CONTACT NAME

CLEC NAME/CUSTOMER NAME

CLEC/CUSTOMER ADDRESS

CITY, STATE, ZIP CODE

Dear (customer contact)

This is to acknowledge the receipt of your claim(s) dated_____ for:

SUMMARY BTN#_____SUMMARY BILL DATE_____

TOTAL AMOUNT OF CLAIM_____(CREDIT/DEBIT)

CLAIM (S)
DESCRIPTION_____
_____
_____
_____
_____
_____
_____

* I am investigating the above claim(s). I expect to have an answer within 30 days. You are withholding $_____pending resolution. Late payment charges could apply should this dispute be settled in favor of US WEST.

* I am investigating the above noted claim(s). I expect to have an answer within 30 days. You have paid the disputed amount pending resolution. Interest could apply should this dispute be settled in your favor.

* I am unable to proceed with any investigation of the above noted claim, as you have not included complete details of the claim. Until such time as sufficient detail is forwarded to Qwest we are unable to consider or investigate your claim. The following information must be provided to Qwest prior to acceptance of any claim:

Wholesale

- Name of Company
- Email address if applicable
- Contact Name, Telephone Number and address
- Bill Date(s) – upon which disputed item(s) appear.
- Summary Bill Account Number if applicable
- Sub Account number(s) – where disputed item(s) appear if applicable
- Reason(s) for dispute of item(s).
- Service Order number and completion date if applicable
- Complete details of dispute:
  - Detail should be complete for item(s) in dispute, I.E.; if the item is a toll call, all detail needs to be provided including: Entity billed under, dates, to number and amount of call.
- Bill/CSR Page number if applicable

Retail

- Customer Name
- Email address if applicable
- Contact Name, Telephone Number and address
- Bill Date(s) – upon which disputed item(s) appear.
- BTN (Billing Telephone Number)
- WTNs (Working Telephone Number) – Where disputed item(s) appear.
- Reason(s) for dispute of item(s).
- Service Order number and completion date if applicable.
- Complete details of dispute:
  - Detail should be complete for item(s) in dispute, I.E.; if the item is a toll call, all detail needs to be provided including: Entity billed under, dates, to number and amount of call.
- Bill/CSR Page if applicable

If I can be of any assistance please do not hesitate to call me on (XXX) xxx-xxxx.

Sincerely,

Service Delivery Coordinator

*Please select the appropriate statement to acknowledge receipt of the claim.

Resolution of Dispute Letter

This is an **example** of a Resolution letter; it can be **altered** to apply to Wholesale accounts or Retail accounts handled by Wholesale.

SAMPLE

DATE

CUSTOMER CONTACT NAME

CLEC NAME

CLEC ADDRESS

CITY, STATE, ZIP CODE

Dear (customer contact)

Regarding your claim for:

SUMMARY BTN#_____SUMMARY BILL DATE_____

AMOUNT OF CLAIM_____(CREDIT/DEBIT)

BALANCE_____(amount resolved in Qwests favor)

We have completed the research on your claim(s). The results of the investigation are as follows:

Insert or attach spreadsheet or other documentation that details the resolution for each item disputed, including in whose favor the dispute has been resolved and how or why conclusion was reached.

(*A) A credit in the amount of $_____will appear on your statement dated_____.

(*B) Interest in the amount of $_____will be credited to your account and appear on your bill dated_____.

(*C) Unless you have any questions or additional information we would appreciate remittance of the balance $_____by _____. Late Payment charges will be assessed if applicable.

(*D) Unless you have any questions or additional information we will consider this dispute closed.

If I can be of any further assistance, please call me at (xxx) xxx-xxxx.

Sincerely,

Service Delivery Coordinator

Attachments

*Please select the appropriate statement(s) above for your letter:

1. Bill has been paid and the dispute was resolved in customer's favor. (A&B)

2. Bill not paid and dispute resolved in customers favor. (A)

3. Bill not paid and dispute resolved in company's favor. (C)

4. Bill paid and dispute resolved in company's favor (D)

PITT Tickets

Please refer to the documentation PITT Process Improvement Tracking tool for instructions for submission of questions and or concerns regarding this document.

CMP – Billing Change Requests

15 Billing CRs Submitted by CLECs – Current Status

Summary:

- 4 Completed
- 3 Closed or Withdrawn (by CLECs after evaluation/additional info determined)
- 1 Denied (due to incorrect assumption concerning MAN/SBN numbers and their association with circuit numbers)
- 2 Underway
- 5 In Clarification/Evaluation steps

- Completed

  SCR090601-1 - Request That UNE-P Orders be billed on a CABS Bill
  Requested by ATT 09/06/2001
  Project implemented July 1, 2002

  CR5043187 - Payment History Information on Invoices
  Submitted by Eschelon on 08/31/2000
  Completed 3/1/02

  CR5043134 - Populate all Billmate Fields/Columns.
  Submitted by Eschelon on 08/31/2000
  Completed 2/21/02

  SCR091201-1 - New Indicator on the Service Activity File
  Submitted by McLeod 09/12/2001
  Implemented 10-01-2001

- Closed/Withdrawn

  CR5043197 - Identification of PIC Code in BillMate
  Submitted by Eschelon 8/31/2000
  Closed 7/1/02

  CR5043149 - Bill Mate Uniformity
  Submitted by Eschelon 08/31/2000
  Withdrawn 2/21/01

  CR5110474 - Provide Calculation Description of Each Termination Penalty Levied on Eschelon
  Submitted by Eschelon 08/31/2000
  Withdrawn 2/21/01

- Denied

  CR5043226 - UNE Invoice Detail
  Submitted by Eschelon 08/31/2000
  Denied 10/18/01

- Underway

  CR5328167 - Request that Loop Orders be Billed on a CABS Bill
  Submitted by Rhythms on 01/08/2001
  Moved to development 12/13/01

  CR5043176 - Better Explanations of OCCs on Invoices
  Submitted by Eschelon 08/31/2000
  Evaluation 6/21/02

- In Clarification/Evaluation Steps

  SCR042902-01 - Use CLEC Internal Repair Ticket Number on CLEC Bill to Identify Maintenance & Repair Charges
  Submitted by Eschelon 04/29/2002
  Evaluation on 6/20/02

  SCR053002-03 - Visibility to Total Monthly Charges and Other Charges & Credits for Summary Accounts
  Submitted by Sprint 05/30/2002
  Presented at 6/20/02 CMP meeting

  SCR060402-04 - BillMate to Include CKT ID and Date of Qwest Dispatch for TIC, MOS, Dispatch and Optional Testing charges
  Submitted by Eschelon 06/04/2002
  Evaluation on 7/18/02

  SCR061802-02 - Separate Local End Office Usage and Shared Transport on UNE-P BillMate Files
  Submitted by Eschelon 06/18/2002
  Evaluation on 7/18/02

  SCR061902-01 - CLLI code on UNE P and UNE Loop on MONSERV file and paper bill
  Submitted by Eschelon 06/19/2002
  Evaluation on 7/18/02

Draft PID BI-5

BI-5 Billing Accuracy & Claims Processing 26 Jul 02 Draft

Purpose:
Evaluates the promptness with which Qwest acknowledges and resolves CLEC billing adjustment claims processed in the Service Delivery Center.

Description:
Measures the percentage of billing adjustment claims acknowledged and resolved within specified timeframes.

BI-5A – Measures the number of valid complete billing adjustment claims acknowledged during the month within two business days of receipt.

BI-5B – Measures the number of valid complete billing adjustment claims received during the month that are resolved within 30 calendar days after receipt. NOTE 1

- Business hours for receipt of billing claims are Monday through Friday, 8:00 AM to 5:00 PM, MT excluding Qwest Legal Holidays.
- CLEC billing adjustment claims received outside these business hours shall be considered received at 8:00 am on the first business day thereafter.
- Day of receipt shall be considered Day "0" for computing acknowledgement performance.
- Day of receipt of a billing claim is considered Day "0" for computing resolution performance.

Reporting Period: One month

Unit of Measure: Percent

Reporting Comparisons: CLEC aggregate

Disaggregation Reporting: Region-wide level.

Formula:

BI-5A = [∑(Number of valid complete billing claims acknowledged during the month within two business days of receipt) ÷ (Total number of valid complete billing adjustment claims acknowledged during the month)] x 100

BI-5B = [∑(Number of valid complete billing claims resolved during the month within 30 calendar days after receipt) ÷ (Total number of valid complete billing adjustment claims resolved during the month)] x 100 NOTE 1

Exclusions:

- CLEC claims for incentive regulation credits, credits for performance remedies, out of service, and special promotional credits.
- CLEC claims that involve service order inquiries, account structure, or that are in fact matters of contract or tariff interpretation. Service order inquiries include those that request PON numbers. Account structure inquiries include those for independent bills, summary bill transfers, and unknown lines.
- CLEC claims related to bill media or technical issues.

Product Reporting: None

Standard:
BI-5A: 95% within two business days.
BI-1B: 95% within 30 calendar days (after receipt.)

Availability:

Under Development

Notes:

1. Please note this calculation cannot be gathered until one month after the end of a given month in order to capture closure of all disputes.

Summary of DUF Test History

I. KPMG DUF Test 1 & 2

Stopped due to test bed problems. No test calls were actually made.

II. KPMG DUF Test 3: June 11 – June 29, 2001

Qwest Billing System Changes:

- Created and subsequently enhanced a Pending Order File ("POF") process to allow usage to be held when the involved TN converts from one LEC to another;
- Fixed occasional creation of duplicate records; and
- Correctly formatted credit records on the DUF.

III. KPMG DUF Test 4: October 28 – November 1, 2001

Qwest Billing System Changes:

- Fixed POF processing related to certain measured service records;
- Augmented Eastern Region toll guide data;
- Modified 8XX business rules to ensure DUF records are correctly populated;
- Changed processing to correctly identify EAS calls as local on the DUF; correctly populate the rate class field on DUF records; and fixed problem related to the distance calculation of local measured service calls; and
- Fixed the message investigation process to ensure records were handled correctly.

IV. KPMG DUF Test 5: January 7 – January 11, 2002

Qwest passed Test 5 in its Eastern and Western Regions.

Qwest Billing System Changes to Central Region:

- Fixed condition specific to C-order conversions to UNE-P when the C-order posted in CRIS on a Thursday or Friday;
- Amended the POF process for operator-assisted local calls to assure only a local DUF record was created; and
- Fixed DUF processing for alternately-billed calls originating from a UNE-P line.

V. KPMG DUF Test 6: March 11 – March 15, 2002

Qwest passed the Test 6.

Number of CLECs Certification Testing in Interoperability Environment and SATE *
(As of July 9, 2002)

* Qwest provided this material to the DOJ and FCC via *ex parte* filing on July 15, 2002. In that version, Qwest inadvertently omitted information from New Access for Release 7.0. This omission does not alter the total number of CLECs certification testing in Interoperability and SATE.

CLEC		Release	Production Date	Products	Interop/ SATE

[Redacted]

allegiancetelecom,inc.

1950 Stemmons Fwy.
Suite 3026
Dallas, TX 75207
214/261-7100 phone
214/261-7110 fax
www.allegiancetelecom.com

Jeff Thompson - Director IT
Qwest Communications, Inc.
1005 17th Street
Denver, CO. 80202

Jeff,

Allegiance has used the Qwest Testing environment on four different occasions in the past 15 months. I am the primary testing person who has conducted all those tests from the initial implementation forward to today.

The evolution of that testing process has to me been a pleasure to watch and be a part of. The introduction of SATE has greatly reduced the amount of time spent in every aspect of testing with Qwest and has made, what initially seemed like a huge headache, into really a pleasure to test with. The results are always consistent. Whether it be in the data returned, the timeframe for responses or the level of assistance I have received from my testing team, all have exceeded my expectations.

Allegiance is a Facilities based provider that primarily does REQTYP A, B, and C orders (Unbundled Loops, Loop Service with Number Port, and Local Number Port). I am also a member of the SATE users groups where I have submitted several CR's for SATE enhancements that have been completed in a timely manner. Allegiance has also used the additional data request process to add values to the SATE environment with very little difficulty. If you have any additional questions about our testing experience with Qwest please feel free to contact me.

Thanks,

Ian J. Coleman

Ian J. Coleman
IS - Gateway Development
Allegiance Telecom
(469) 259 4361

VOLUME 3-B
BEFORE THE OFFICE OF ADMINISTRATIVE HEARINGS
OF THE STATE OF MINNESOTA

In the Matter of the Complaint of AT&T Communications of the Midwest, Inc. against Qwest Corporation

MPUC DOCKET NO. P-421/C-01-391
OAH DOCKET NO. 12-2500-14262-2

Minnesota Public Utilities Commission
350 Metro Square Building
121 Seventh Place East
St. Paul, Minnesota

Met, pursuant to notice, at 1:10 o'clock in the afternoon on July 11, 2001.

BEFORE: Judge Steve Mihalchick
REPORTER: Angie D. Threlkeld, RPR

APPEARANCES:

MARY B. TRIBBY, Attorney at Law, AT&T, 1875 Lawrence Street, 15th Floor, Denver, Colorado, 80202, and W. PATRICK JUDGE, Attorney at Law, Briggs & Morgan, 332 Minnesota Street, Suite 2200, St. Paul, Minnesota 55101, appeared for and on behalf of AT&T.

ROBERT CATTANACH, Attorney at Law, Dorsey & Whitney, 220 South Sixth Street, Suite 1700, Minneapolis, Minnesota, 55402, and JASON TOPP, Attorney at Law, Qwest Corporation, 200 South Fifth Street, Room 395, Minneapolis, Minnesota, 55402, appeared for and on behalf Qwest Corporation.

STEVEN ALPERT and PETER MARKER, Assistant Attorneys General, 525 Park Street,

Suite 200, St. Paul, Minnesota, 55103, appeared for and on behalf of the Department of Commerce.

KAREN HAMMEL, Assistant Attorney General, 1100 NCL Tower, 445 Minnesota Street, St. Paul, Minnesota, 55105, appeared for and on behalf of the PUC.

COMMISSION STAFF: Diane Wells
Ray Smith

I N D E X - 3-B

WHEREUPON, the following proceedings were duly had and entered of record, to wit:

JUDGE MIHALCHICK: All right. Back on the record.

Mr. Judge.

MR. JUDGE: Thank you, Your Honor. I have a couple more questions.

CONTINUED DIRECT EXAMINATION

[intentionally omitted]

Redirect Examination of Edward Gibbs, by Mr. Judge
Pages 851-856

Q Thank you. In your opinion is Qwest's one, two, three test designed in a way that it could be somehow beefed up to reach the same or obtain the same data that your friendlies test is designed to do?

A Let's see.

Q Is the question making sense?

A Yes. I'm just -- Pat, what's going through my mind is the one, two, three test is the one, two, three test; and there are things it does and doesn't do. It doesn't validate USOCs at all. So in terms of a difference in the friendlies test, I mean, right after the friendly test started I ran into a -- I used the wrong USOC for a feature. It would have been nice to have used USOCs during the one, two, three test so I -- so I would not have done it during the friendly test.

It would have been nice to have a wholesale bill coming out of the one, two, three test. It does not do wholesale billing. Wholesale billing is important to me because I verify that they're charging me the rates for the features I'm renting that they say they're going to charge.

I don't know that the one, two, three gives DUF files. The DUF files, in doing a billing audit, is important to me because I need to be able to bill my customers on time. So, therefore, I need the records that come from this.

And the one, two, three test, as it exists here, would be a little bit more difficult for me to understand provisioning or a potential misprovisioning -- misprovisioned orders. And what I mean by that is I know when things are supposed to complete because of their FOC or their multiple FOCs. And what I do is plug a phone into the line when I get a completion. In the one, two, three test we used employees. And so they may or may not test the line correctly. I wouldn't feel comfortable coming to Qwest, saying,

You've got these problems with misprovisioning, because I don't have control of the testers. In the environment that we have, I train and every month go through quality reviews with the testers so I know that if they're testing call waiting or testing call forwarding or testing 800 numbers on the billing call that they're doing it correctly; we're monitoring them. So when I come to them and say, This is misprovisioned, I feel comfortable. It doesn't mean they're 100 percent. But I feel comfortable that what I'm asking of Qwest is not a waste of time; it's a real, real issue that I'm putting in front of them. So I would lose control. I don't have control of the one, two, three test for provisioning that I would have.

And then the last thing is the one, two, three test sends me back one time stamp per step. So they send me an acknowledgment; okay, did you get it; yeah, I got the acknowledgment. They send me a FOC; did you get it. Send me a FOC, send me -- or a reject, and they send me a completion notice. In the real world Qwest sends multiple FOCs. That would never come out in this test because, remember, we're hand holding and we're forcing time stamps back. The multiple FOC issue sent me for a loop until we figured out what it was they were doing. While EDI -- While EDI is not a national standard, there are time stamps that you expect to receive. I expect to receive an 855, which is a FOC; and if the data changes, I expect to receive an 865. In their business rules it says, I'll send you a FOC for the due date; I'll send you a jeopardy notice. When they change the due date, they send another FOC. So that kind of stuff you don't find out in this test.

That test is very good for connectivity. That test is very good to say do -- We have a system hand shakes electronically. EDI can be tough, so it's -- that test is great for saying, I've got the EDI interpreted correctly. And so in -- for what it does, it's fine. You need to add a friendly test to it to get some market seasoning. And a combination of it and a certification and a ROC gives you a way to

evaluate completely --
Q Based on all --
A -- the market.
Q I'm sorry. Did I interrupt?
A I'm done.
Q Okay. Based on all of that, and you put this in your own words if I'm incorrect, but is it fair to say that it would be extremely difficult, if not impossible, to integrate the one, two, three test with your friendlies test?

MR. CATTANACH: Objection. Leading.

JUDGE MIHALCHICK: Sustained.

BY MR. JUDGE:
Q Mr. Gibbs --

MR. JUDGE: Thank you, Your Honor. And I'll rephrase that.

BY MR. JUDGE:
Q What is your opinion about the feasibility of integrating these two different tests?
A I think the way we did it they are integrated. I would not do a friendly test without doing a certification test. The one, two, three test is an excellent certification test. I didn't follow the certification test with real orders for real lines. And to me, by my integration, is they're a perfect sequential process.

MR. JUDGE: Thank you. I have nothing further.

JUDGE MIHALCHICK: Mr. Marker?

MR. MARKER: Nothing for Mr. Gibbs at this time, Your Honor.

JUDGE MIHALCHICK: Mr. Cattanach?

MR. CATTANACH: No, thank you.

JUDGE MIHALCHICK: Thank you.

(Whereupon, the witness was excused from the stand.)

JUDGE MIHALCHICK: Let's take a break here. Go off the record.

Reply Exhibit LN-40

Error Message Example

Appointment Availability Response Map	Appointment Availability Response with Error Coded into SATE	Appointment Availability Response with Error not coded into SATE
ST|855|*TRAN SET CONTROL #* BAK|11|A*T*|*TXNUM* |*PO Date* REF|PO|*PON* DTM|097|*D/TSEN*T{CCYYMMDD}|*D/TSEN*T{HHMM} SI|TI|IR|*TXACT* |IQ|*TXTYP* |SA|*APPTACT* N1|78|*CCNA* PO1|n|1|EA|||ZZ|*BAD* ACK|IR||||||||||||||||||||||||TI|*APPOINTMEN*T|*RESPONSE* QTY|03|*ERRNUM* |EA N9|1Q|*ERRCODE* |*ERR* **MTX||*ERRMESG*** CTT|*Number of PO1 Segments* SE|Number of Segments|*TRAN SET CONTROL #*	ST|855|760001 BAK|11|AT|10AAQ03|20020708 REF|PO|AAQ3 DTM|097|20020708|1553 SI|TI|IR|R|IQ|U|SA|N N1|78|R31 PO1|1|1|EA|||ZZ|BAD ACK|IR||||||||||||||||||||||||TI|APPOINTMENT|B QTY|03|1|EA N9|1Q|AA 999|ERR **MTX||*No Available Appointment*** CTT|1 SE|13|760001	ST|855|760001 BAK|11|AT|10AAQ03|20020708 REF|PO|AAQ3 DTM|097|20020708|1553 SI|TI|IR|R|IQ|U|SA|N N1|78|R31 PO1|1|1|EA|||ZZ|BAD ACK|IR|||||||||||||||||||||||TI|APPOINTMENT|B QTY|03|1|EA N9|1Q|AA 999|ERR **MTX||*OSS Gateway: Timeout*** CTT|1 SE|13|760001

This mapping example provides a common format for each EDI transaction. When the transaction is processed, the data is placed into the field assigned for that data. For example, the error message is always put into the field that begins with "MTX" as shown above in bold. Because the data is always in the same field, the transaction can be processed even when the data within the field is different. As shown above, the error message coded into SATE "No Available Appointment" is in the same field as the error message not coded into SATE "OSS Gateway:Timeout."

When a CLEC receives an errored transaction, the error message will always be in the MTX field. This allows the CLEC's system to display the error message to their user. The user can then take action to resolve any issues with the transaction and resend to Qwest. The error messages must be resolved by a human, because a machine will be unable to determine how to fix the problem. For example, the "No Available Appointment" error would trigger a person to find another appointment date that met the needs of the CLEC.

As the CLEC cannot systematically fix the errored transactions, CLECs do not need to test all possible errors. The CLEC's system will process the errors the same regardless of content.

Telephone Number Reservation Example

<table>
<tr><th>Telephone Number Reservation Response Map</th><th>SATE Telephone Number Reservation Response</th><th>Production Telephone Number Reservation Response</th></tr>
<tr><td>ST|855|<i>TRAN SET CONTROL #</i></td><td>ST|855|470001</td><td>ST|855|460001</td></tr>
<tr><td>BAK|11|AT|<i>TXNUM</i>|<i>PO Date</i></td><td>BAK|11|AT|TAQ2PO19B|20020719</td><td>BAK|11|AT|TAQ2PO19B|20020719</td></tr>
<tr><td>REF|PO|<i>PON</i></td><td>REF|PO|TNAQ-A002</td><td>REF|PO|TNAQ-A002</td></tr>
<tr><td>DTM|097|<i>D/TSENT</i>{CCYYMMDD}|<i>D/TSENT</i> {HHMM}</td><td>DTM|097|20020719|1444</td><td>DTM|097|20020719|1434</td></tr>
<tr><td>SI|TI|IR|<i>TXACT</i>|IQ|<i>TXTYP</i></td><td>SI|TI|IR|R|IQ|B</td><td>SI|TI|IR|R|IQ|B</td></tr>
<tr><td>N1|78|<i>CCNA</i></td><td>N1|78|R30</td><td>N1|78|T30</td></tr>
<tr><td>PO1|n|1|EA|||ZZ|<i>GOOD</i></td><td>PO1|1|1|EA|||ZZ|GOOD</td><td>PO1|1|1|EA|||ZZ|GOOD</td></tr>
<tr><td>SI|TI|SS|<i>SCATEG</i>|IC|<i>SITEID</i>|LO|<i>TTA</i>|RQ|<i>REQNUM</i>|T0|<i>TNTYPE</i></td><td>SI|TI|SS|P|IC|DNVRCOSE|LO|691|RQ|303691|T0|N</td><td>SI|TI|SS|P|IC|DNVRCOSE|LO|691|RQ|303691|T0|N</td></tr>
<tr><td>ACK|IA|||||||||||||||||||||||TI|<i>TELEPHONE</i>|<i>RESPONSE</i></td><td>ACK|IA|||||||||||||||||||||||TI|TELEPHONE|G</td><td>ACK|IA|||||||||||||||||||||||TI|TELEPHONE|G</td></tr>
<tr><td>QTY|SW|<i>TNCOUNT</i>|EA</td><td>QTY|SW|6|EA</td><td>QTY|SW|6|EA</td></tr>
<tr><td>SLN|<i>GOOD</i>|n|A|1|EA [SLN and SI repeat together <i>TNCOUNT</i> times]</td><td>SLN|GOOD|1|A|1|EA</td><td>SLN|GOOD|1|A|1|EA</td></tr>
<tr><td>SI|TI|RV|<i>TNRES</i></td><td>SI|TI|RV|303-691-2838</td><td>SI|TI|RV|303-691-0723</td></tr>
<tr><td></td><td>SLN|GOOD|2|A|1|EA</td><td>SLN|GOOD|2|A|1|EA</td></tr>
<tr><td></td><td>SI|TI|RV|303-691-2839</td><td>SI|TI|RV|303-691-0730</td></tr>
<tr><td></td><td>SLN|GOOD|3|A|1|EA</td><td>SLN|GOOD|3|A|1|EA</td></tr>
<tr><td></td><td>SI|TI|RV|303-691-2840</td><td>SI|TI|RV|303-691-0742</td></tr>
<tr><td></td><td>SLN|GOOD|4|A|1|EA</td><td>SLN|GOOD|4|A|1|EA</td></tr>
<tr><td></td><td>SI|TI|RV|303-691-2841</td><td>SI|TI|RV|303-691-0754</td></tr>
<tr><td></td><td>SLN|GOOD|5|A|1|EA</td><td>SLN|GOOD|5|A|1|EA</td></tr>
<tr><td></td><td>SI|TI|RV|303-691-2842</td><td>SI|TI|RV|303-691-0760</td></tr>
<tr><td></td><td>SLN|GOOD|6|A|1|EA</td><td>SLN|GOOD|6|A|1|EA</td></tr>
<tr><td></td><td>SI|TI|RV|303-691-2843</td><td>SI|TI|RV|303-691-0761</td></tr>
<tr><td>CTT|<i>Number of PO1 Segments</i></td><td>CTT|1</td><td>CTT|1</td></tr>
<tr><td>SE|No of Segments|<i>TRAN SET CONTROL #</i></td><td>SE|24|470001</td><td>SE|24|460001</td></tr>
</table>

This mapping example provides a common format for each EDI transaction. When the transaction is processed, the data is placed into the field assigned for that data. For example, the telephone number (TN) is always put into the field that begins with "SI|TN" as shown above in bold. Because the data is always in the same field, the transaction can be processed even when the data within the field is different. As shown above, the TNs returned are always in the same field, although the actual TNs returned are different.

Percentage of Production Legacy Errors Available in SATE

Pre-Order Transaction	Total BPL Errors (SATE and Production)[1]	Total Production Legacy System Errors[2]	Total SATE-coded Legacy System Errors[3]	Percentage of Production Errors Available in SATE
Appointment Availabilty Query[4]	27	4	0	87.10%
Appointment Selection Query[4]	14	3	0	82.35%
Address Validation Query	30	19	3	67.35%
Connecting Facility Assignment Query	15	10	3	72.00%
CSR Retreival	54	39	3	61.29%
Facility Availability Query	57	37	6	67.02%
Loop Qualification Query	47	6	2	92.45%
Meet Point Query	27	3	1	93.33%
Raw Loop Data Query	40	0	0	100.00%
Service Availability Query	11	0	0	100.00%
Telephone Number Availability Query[4]	53	13	0	80.30%
Telephone Number Selection Query	16	0	0	100.00%

[1] As production and SATE use the same IMA software, including the Business Processing Layer (BPL), the BPL errors are the same in both systems.

[2] The Total Production Legacy System Errors column reflects the number of legacy system errors seen in production in the six months from December 2001-May 2002.

[3] CLECs can use the SATE data request process to request any additional legacy system error(s) be coded into SATE. To date, no requests for additional legacy system errors have been received from any CLEC.

[4] The Appointment and Telephone Number (TN) Reservation transactions have no associated SATE coded legacy messages due to the nature of the legacy error messages in production. For example, the legacy system errors (1) cannot be replicated in SATE due to the dynamic nature of daily production processing (for example, the "legacy system unavailable" message when a legacy system outage occurs); or (2) are not commonly seen in production.

Minutes
SATE Users' Group Meeting
May 21, 2002

SATE Users' Group Mission Statement

- Give Qwest the opportunity to communicate current plans for it's testing environments.
- Give the CLECs the opportunity to communicate their current and future testing needs.
- Jointly present a list of CRs to CMP to ensure that future enhancements of Qwest environments meet those stated CLECs' needs.

Attendees

Ian Coleman-Allegiance, Wendy Green-Qwest, Johanna Hunter-Qwest, Samantha Kratzet-Qwest, Wendy Latta-Qwest, Sai Rao-AT&T, John Paul-Accenture, Shelly Rooney-Covad, Becky Oliver-WorldCom, Troy Dawson-Eschelon, Candy Skaff-Eschelon

4/23 Meeting Agenda

- Review of Meeting Minutes from the meeting held on 3/26/02
- Review of Action Items
- Review 10.0 Flow Through White Paper
- 11.0 Prioritization Results
- Status of proposed CMP CRs
- Walk-ons
- 2002 Meeting Schedule (all meetings scheduled on the Tuesday following the CMP Systems monthly meeting from 9 a.m. – 11 a.m. MST):
  - 5/21/02
  - 6/25/02
  - 7/23/02

Meeting Minutes from the meeting held on 4/23/02 were reviewed and accepted at the 5/21/02 meeting.

SATE Negative Testing

Wendy Green-Qwest proposed the following HP recommendation:
In February, HP conducted a test of SATE's 9.0 Release for the state of Arizona. This was a follow-up to the SATE test conducted in December. In the resulting report, HP made the following recommendation:

"Qwest should consider asking CLECs to submit data requests for negative scenarios and BPL edits for key transactions."

Based on this recommendation, Qwest would like to receive feedback from the CLECs on if they feel the need to have additional, specific negative scenarios added to SATE.

Currently, Qwest requires CLECs to test the ability to receive a reject response for each pre-order query, and an ISC and BPL reject for an order transaction. The exact error received can be any valid Qwest Legacy System error. HP's recommendation would add additional scenarios to the Data Document, which would be required of CLECs in testing a new release.

Related Discussion
Wendy Green-Qwest: Do the CLECs want to add additional negative testing requirements to SATE?
Donna Osbourne-Miller-AT&T: Would the CLECs be required to test the additional responses?
Wendy Green-Qwest: Yes, it will be required. If functionality or a product is deemed critical enough by SATE Users to be added into SATE, then Qwest carries the responsibility to ensure it is utilized.
Ian Coleman-Allegiance: Currently, SATE supports negative responses. How would the proposed responses differ?

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SATE Users' Group Meeting
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Wendy Green-Qwest: The negative responses currently existing in SATE provide somewhat general response messages. The additional responses would be much more specific.
Wendy Latta-Qwest: An example of a negative response proposed could be in response to the system checking a CSR to ensure it is not in a pending disconnect state.
Candy Skaff-Eschelon: Is there a way to test specific negative responses without adding all the proposed responses?
Wendy Green-Qwest: Yes, the Data Request process could be used.
Ian Coleman-Allegiance: Would the new responses test a new response format?
Wendy Green-Qwest: No, the response format would be the same, only the response text would be different.
Candy Skaff-Eschelon: If the additional negative responses were not added to SATE, how would the CLECs receive specific negative response data?
Wendy Green-Qwest: There is a response and Qwest Legacy System Error list available for CLEC reference. Additionally, if a CLEC wanted to test a certain error message, Qwest would provide the data necessary to receive the desired response.
Bob Carias-Nightfire: There are only three types of negative testing; a -997, -855 and –865. All other error messages would be handled
Donna Osbourne-Miller-AT&T: I agree with Bob that there are only three types of negative testing and all others are worked out on an
John Paul-Accenture: As part of an LSR response, I have received an FOC with an error message in it.
Wendy Green-Qwest: John, I will take an action item to get with you regarding this response. It doesn't sound like proper functionality.
Ian Coleman-Allegiance: It may be a Listings error.
Louise Ng-HP: Wendy, would you please reiterate what negative testing means to the CLECs.
Wendy Green-Qwest: The CLECs prefer the current testing requirements, but do not feel the need to add specific error messages to required testing. Qwest does not require testing a –997. Do the CLECs feel this should be required?
Ian Coleman-Allegiance: Many CLECs may not know how to create a –997, so who would benefit from requiring this testing.
Bob Carias-Nightfire: Those CLECs utilitizing a Service Bureau's software may even have less of an possibility to test –997.
Wendy Green-Qwest: Yes, that is another important consideration.
Donna Osbourne-Miller-AT&T: Testing –997 should be optional.
John Paul-Accenture: I would like the option of testing a –997 to ensure I can resubmit a 997 if it initially errored out of Qwest systems.
Wendy Green-Qwest: I will take an action item to ensure the option to test a –997 is clear in the SATE documentation.

Status of proposed CMP CRs

- Fifteen of the product CRs proposed to be added into SATE have had little or no CLEC interest and have a status of pending withdrawal. These CRs will be closed by Friday, 4/26/02, unless a CLEC would like to take over CR ownership.
- Eschelon has recently decided to sponsor the Centrex 21 product enhancement [SCR101901-1].
- The following five CRs currently in CMP originated in the SATE Users' Group meeting:
  - 122701-2 All current SATE data must be altered to utilize NPA/NXXes currently in Qwest's network footprint.
  - 122701-3 SATE must support Loop Splitting and all its activities
  - 122701-4 SATE must support Line Splitting and all its activities
  - 122701-5 SATE's hours of availability must be increased to Monday through Friday 6 am to 8 pm MST.
  - 122701-6 SATE must support Facility Based Directory Listings and all its activities

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- A product that does not have current CLEC interest can be requested to be supported in SATE at a later date by opening a product CR.

  Related Discussion
  Becky Oliver-WorldCom: Has there been CLEC input for which products should be supported going forward.
  Wendy Green-Qwest: Yes, CLECs provided their input through their CR prioritization in CMP and have been encouraged to provide comments on which products need to be supported in the future. CLECs must have their input to Qwest by close-of-business this Friday, April 26, 2002, on those product CRs that are in a status of pending withdrawal.

Walk-Ons

Wendy Latta-Qwest presented the new SATE candidate Pending Service Order Notice (PSON), with the goal of providing the SATE Users an opportunity to give comments on the scope of this new candidate. PSON will be an option for CLECs in production IMA and SATE.

Pending Service Order Notice (PSON) contains the Service and Equipment (S&E) data from pending service orders submitted by CLECs. To utilize PSON functionality, a CLEC must set preferences indicating to Qwest the desire to receive PSONs – similar to Status Updates.

The most common business scenario is: FOC ■ PSON ■ Completion.

Qwest is in the process of defining VICKI paths to enable testing of the Pending Service Order Notice. Qwest is looking into alternate business scenarios to determine whether any additional VICKI paths are needed for CLEC testing. It is possible that a PSON may be immediately followed by a second or subsequent PSON notice. In production, the subsequent PSON would be triggered by a change in the S&E section of the pending order.

In SATE VICKI, the S&E section of the PSON notice will be static data, as it is currently for a Completion notice. Any subsequent PSON would have identical S&E data as the initial PSON with the only change being that a counter would increment to show that this is representative of a subsequent PSON. In order to create an FOC ■ PSON ■ PSON ■ Completion path, in addition to the regular PSON path, would require some effort since this path should need to exist for every product, activity and supplemental type to be truly representative. Qwest would not want to expend this effort if the SATE Users thought that these paths would be an option they would not utilize. This candidate would not be a required scenario by Qwest for CLEC certification.

The CLECs attending the 4/23/02 SATE Users' Meeting do not, at this time, see the value of adding PSON to every product, activity and supplemental type in VICKI. Qwest will provide paths to represent the key PSON functionality for CLEC testing purposes in IMA 10.1. Once PSON is implemented, if a CLEC would like to test the multiple PSON scenario in VICKI, the CLEC will complete a Data Request and submit it to Qwest.

Related Discussion
Ian Coleman-Allegiances: Is the PSON candidate optional for CLECs in production?
Wendy Latta-Qwest: PSON is optional for CLECs in both production and in SATE.
Ian Coleman-Allegiance: If a CLEC would like to utilize PSON in production, then would the CLEC be required to test it in SATE?
Wendy Green-Qwest: Yes, that is correct.
Becky Oliver-WorldCom: Based on the current agreement, if a CLEC was to submit a Data Request for additional PSON paths in the future, would the Level of Effort (LOE) be greater at a later date?

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Wendy Latta-Qwest: It would not increase the LOE due to the fact that the same work needs to be done regardless of when the PSON paths are added to VICKI.
Becky Oliver-WorldCom: I need to discuss this agreement further with my internal contacts.
Wendy Green-Qwest: Becky, please e-mail me directly if you have any further questions or concerns. My e-mail address is wteepe@qwest.com.

New Action Items
None

Old Action Items
None

Closed Action Items

- Wendy Green-Qwest, will research if CR #122701-5 could be prioritized out of cycle. **03/26/02 Update: CR#122701-5 is included in the prioritization for Release 11.0. However, Wendy is still investigating the possibility of implementing this CR out of cycle.** (This item was erroneously moved to 'Closed' in the 4/23/02 meeting). **04/23/02 Complete. Qwest will extend hours to 6:00am MT to 6:00pm MT, effective May 27, 2002.**
- Wendy Latta-Qwest will ensure a Whitepaper is provided for the 10.0 Flow Through enhancement to be discussed at next month's meeting. **04/23/02 Complete**
- Qwest will update the SATE Data Document to reflect the newly adopted document publication schedule noted above by April 15, 2002. **04/23/02 Complete**
- Qwest will publish a release notification notifying the CLEC community of the above mentioned document schedule change. **04/23/02 Complete**

The next SATE Users' Group Meeting will be held on May 21, 2002 from 9:00am – 11:00am MST.

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

QWEST'S NOTICE OF FILING QUARTERLY STATUS REPORT ON THE SATE RECOMMENDATIONS

Qwest Corporation ("Qwest') hereby provides notice of filing the attached Quarterly Status Report on the SATE Recommendations. Qwest hereby files said SATE status report as requested in the Arizona Corporation Commission (the "Commission" or "ACC") Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements – Operational Support System Requirements, dated May 1, 2002 (Staff's Recommendation Report"). In Qwest's filed comments, Qwest committed to providing quarterly reports beginning June 30, 2002 to address the status of the recommendations.

///

///

Dated this 27th day of June, 2002.

Respectfully submitted,

QWEST CORPORATION

By:_____

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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

QWEST CORPORATION'S QUARTERLY STATUS REPORT ON THE SATE RECOMMENDATIONS

Qwest Corporation ("Qwest") hereby submits this SATE status report as requested in the Arizona Corporation Commission (the "Commission" or "ACC") Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements - Operational Support System Requirements, dated May 1, 2002 (Staff's "Recommendation Report").

I. INTRODUCTION

Staff's "Recommendation Report" includes a SATE recommendation that "Qwest should be required to report to the Commission on a quarterly basis, the status on its progress in implementing the recommendations of Staff and HP".[1] In Qwest's filed comments, Qwest committed to providing quarterly reports beginning on June 30, 2002 to address the status of the recommendations.[2]

HP submitted nine recommendations in its SATE Summary Evaluation Report and four recommendations in its SATE New Release Test Summary Report. Staff submitted three additional SATE recommendations.

Qwest has fully implemented or otherwise addressed all but two of the recommendations. The remaining recommendations relate to finalizing the PO-19 PID, which is still being negotiated between Qwest and the CLECs. Qwest fully expects these recommendations to be met by mid-July.

This serves as the first quarterly report and provides a detailed status on each of the recommendations provided by HP in its SATE Summary Evaluation Report and its subsequent SATE New Release Test Summary Report, and by Staff in its Recommendation Report.

II. STATUS OF RECOMMENDATIONS

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[1] Staff's Supplemental Report on Qwest's Compliance with Checklist Item No. 2: Access to Unbundled Network Elements - Change Management Process and Stand-Alone Test Environment (Staff's "Supplemental CMP/SATE Report") at ¶106.

[2] Qwest Corporation's Comments Regarding CGE&Y's Final Report of the Qwest OSS Test and Staff's Supplemental Report and Staff Recommendation on Qwest's Compliance with Checklist Item NO. 2 Operation Support System Requirements; Section 5c.

A. RECOMMENDATIONS FROM HP'S SATE SUMMARY EVALUATION REPORT

1. Recommendation 1: HP recommends that Qwest submit a plan to ensure that it meets CLEC needs for testing of all products available in Arizona, including new technologies.

The plan and process by which SATE is updated with new products to meet CLEC needs are detailed in Qwest's CMP Change Request (CR) prioritization process. Like any other CMP CRs, SATE CRs for additional products can be submitted and prioritized. The Qwest Wholesale Change Management Process Document defines the CR creation and prioritization process, and states in the Prioritization section that "each OSS Interface *and Test Environment* release is prioritized separately."[3] Qwest's EDI Implementation Guidelines state "...additional functionality can be agreed upon and added in later releases. Request for transactions not currently supported may be requested via CMP".[4]

This process is currently being utilized. On March 25, 2002, Qwest distributed a CR prioritization form to the CLECs through CMP to prioritize all IMA products that SATE does not currently support. On March 28, 2002, the CLECs returned the completed forms, and on April 1, 2002, Qwest published the prioritization results. Two products, Facility Based Directory Listing and EEL, were prioritized at third and fifth, respectively, and are now candidates for

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[3] Qwest Wholesale Change Management Process Document, section 10.0 - http://www.qwest.com/wholesale/cmp/whatiscmp.html (italics added for emphasis)

[4] EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) – http://www.qwest.com/wholesale/ima/edi/document.html

Release 11.0. The CLECs prioritized all remaining products near the bottom of the list. Consequently, these will be prioritized for future releases.

Qwest's CMP process defines the plan Qwest and the CLECs follow to ensure SATE is updated to meet CLECs needs for testing. This recommendation has been met.

2. Recommendation 2: HP recommends that Qwest implement a quality assurance process and a release management practice specifically for the SATE documentation.

On January 15, 2002, in response to this recommendation, Qwest externally published the guidelines that detail the release management, version control, and quality assurance processes that Qwest employs for the issuance of SATE documents. These guidelines are available on the Qwest Wholesale web site.[5]

Qwest's current documentation processes support the production of documents that enable CLECs to properly utilize SATE. This recommendation has been met.

3. Recommendation 3: To ensure continued adequacy of the SATE, HP recommends:

- That Qwest clearly and specifically identify the roles and responsibilities of each individual and organization involved in the SATE. This definition of roles and responsibilities should include goals and objectives and mission statements for each organization and for all personnel. In addition, the job description for each employee should be clearly defined

- That Qwest develop a system of internal controls to ensure accountability for organizations and individuals involved in the SATE

[5] http://www.uswest.com/wholesale/ima/edi/document.html

process. These controls should use clearly defined goals and objectives and should tie specifically to functional responsibility, such as quality of documentation, accuracy of test account data, mirror image of production, etc. Employees involved in the SATE should be encouraged to accomplish these goals and objectives

- That Qwest develop process flow documentation that accurately reflects actual SATE processes and is a reliable guide to CLECs using the SATE

In response to the first two bullet points, Qwest developed a staffing plan that details Qwest's CLEC testing organizational structure and the roles and responsibilities of all resources that directly support the organization. Additionally, this documentation includes objectives of the organization and the processes in place to ensure accountability. This plan is maintained as part of Qwest's IMA EDI Implementation Guidelines,[6] and was initially published with version 9.0 of the guide, released on January 21, 2002.

To address the third bullet point, Qwest developed the process flow documentation as recommended by HP. This information is maintained as part of Qwest's IMA EDI Implementation Guidelines document,[7] and was initially published with version 9.0 of the guide, released on January 21, 2002.

This recommendation has been met.

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[6] EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - http://www.uswest.com/wholesale/ima/edi/document.html

[7] EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - http://www.uswest.com/wholesale/ima/edi/document.html

4. **Recommendation 4: HP recommends that Qwest publish a list of variances between SATE and production business edits to ensure that CLECs are fully aware of any such discrepancies so that a CLEC may effectively develop their business processes in this 'simulated' environment. This list should become a permanent part of the SATE documentation library.**

Qwest initially implemented this recommendation through SATE Release 9.0 and sent the variance documents to the CLECs via email using the EDI distribution list. Qwest initially published four documents for IMA and SATE. These documents include:

- IMA BPL Errors List: a list of all IMA system generated errors. This has been published per release dating back to at least the 5.0 release.
- IMA Legacy System Errors List: This list was generated in January 2002 by querying the production logs for all legacy system error messages seen for the prior six months.
- SATE Legacy System Errors List: This list was published in January 2002 to include all legacy system errors that have been coded into SATE.
- IMA and SATE Legacy System Variance List: This list was published in January 2002 to provide the variance between the legacy system error messages coded into production and those coded into SATE.

In February 2002, the IMA Legacy System Errors List, the SATE Legacy System Errors List, and the IMA and SATE Legacy System Variance List were combined into a single document. The IMA BPL Errors List remained as a separate document for CLEC convenience due to the large size of the document.

Beginning with Release 10.0 and with every new release of IMA, Qwest will run scripts against the production logs of the previous IMA release. The purpose of this exercise is to gather the list of legacy system error messages encountered by the CLECs from the time the previous

release was implemented until the time the new release is implemented. Each time this list is generated, Qwest will then evaluate it against SATE, and establish an updated list of variances.

Additionally, Qwest added the IMA BPL errors list into the single document for the other errors, and now one single variance list is published and available on the Qwest Wholesale web site as of May 23, 2002.[8] The variance list for Release 10.0 was published and posted to the web on June 17, 2002.

Qwest has a process in place to update and publish the errors list on an ongoing basis based on its implementation of this recommendation. This recommendation has been met.

5. **Recommendation 5: HP recommends that Qwest formally incorporate the SATE into the CMP process, and future changes and modifications should be subject to that process and that Qwest develop a permanent, formalized method of obtaining CLEC input and identifying current and future SATE requirements in connection with the CMP process. This process should proactively seek CLEC evaluation of the SATE process, suggestions for improvement, and forecasts for testing requirements. HP also recommends that Qwest obtain input from the CLECs to determine the full suite of products that shall be included in the SATE.**

[8] http://www.qwest.com/wholesale/ima/edi/document.html

SATE is formally incorporated into the CMP process as discussed in Recommendation 1 above. Qwest began the CLEC SATE Users' Group in early November 2001, as part of the CMP process. The purpose of this group is to provide Qwest the opportunity to communicate current plans for the testing environments, to allow CLECs the opportunity to communicate their testing needs, and to jointly present CRs to CMP to ensure that enhancements to Qwest environments meet the CLECs' stated needs.

This user group has met 11 times thus far, beginning with the November 6, 2001, kickoff meeting. To further incorporate SATE into CMP, Qwest's monthly CMP agenda includes a standing entry for SATE discussion. This agenda entry includes discussions on the status of SATE enhancements, SATE CRs, and CLEC feedback. The inclusion of this agenda item began with the January 17, 2002 CMP meeting.

The proactive incorporation of SATE into the CMP process is consistent with the support of IMA, which will ensure that SATE remains adequate to meet the needs of Arizona CLECs and their future testing requirements. This recommendation has been met.

6. Recommendation 6: HP recommends that Qwest develop a formal process by which the SATE will be available for new release testing on an ongoing basis.

Qwest has a formal process by which the SATE will be available for new release testing on an ongoing basis. This process states: "Beginning with release 9.0, new releases of IMA are planned for release on the IMA EDI Stand-Alone Test Environment approximately thirty calendar days prior to their release in production unless that release is deemed to be in 'red

testing status'. Red Testing Status indicates that the IMA release's system testing effort has discovered significant issues that place the release in jeopardy".[9]

Based on the process stated above, IMA EDI Release 9.0 was implemented in SATE on January 27, 2002, and in production on February 25, 2002. Qwest also notes that on October 22, 2001, IMA EDI Release 8.01 was released in SATE 27 days prior to the associated IMA production release. Continuing Qwest's commitment to make SATE available for new release testing, IMA EDI Release 10.0 was available in SATE on May 20, 2002 and placed in production on June 17, 2002. With the deployment of a new release into SATE approximately 30 days prior to production, Qwest has demonstrated that it has an existing formal process by which SATE is available to CLECs for new release testing going forward.

Qwest has appropriate processes in place to continue making SATE available for new release testing. This recommendation has been met.

7. **Recommendation 7: To ensure that the SATE is adequate for full release testing, HP recommends that 9.0 be tested. This release is expected to take place February 2002.**

Based on this recommendation, HP was asked by the ACC to perform full release testing against SATE 9.0. After completing this second evaluation in March 2002, HP concluded, "the Qwest SATE is adequate to support New Release Testing by a CLEC."[10]

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[9] EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL) - http://www.uswest.com/wholesale/ima/edi/document.html

This recommendation has been met.

8. **Recommendation 8: HP recommends that a SATE performance standard be developed for Arizona that addresses the need for Qwest to demonstrate that the SATE remains an adequate mirror image of production as OSS systems evolve. In reviewing this standard, the ACC may wish to consider the nature and volume of transactions that are executed in production.**

At the time this recommendation was made, Qwest had already proposed a measurement that subsequently was adopted by the Arizona TAG, satisfying this recommendation.

Qwest developed a SATE performance measure, PO-19 – Stand-Alone Test Environment (SATE) Accuracy.[11] The language of this measure has been agreed and its purpose is to "evaluate Qwest's ability to provide accurate production-like tests to CLECs for testing both new releases and between releases in the SATE environment."[12]

The Arizona SATE PID was developed by consensus with the CLEC's. However, the standard for this measure was not determined until later, and was set at 95%. Qwest began reporting this measure with November 2001 results in the December 2001 reports.

Additionally, based on further CLEC input, Qwest has proposed a modification to PO-19, which includes a new sub-measure to execute the same transactions in production and in SATE, to further measure the extent to which SATE mirrors production. This modification is currently

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[10] HP SATE New Release Test Summary Report, section 2.1.

[11] Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

under discussion in Arizona and Qwest has committed to publishing results for the updated PID beginning with July data.

9. **Recommendation 9: HP recommends that Qwest file with the ACC an implementation plan for the above recommendations, which includes specific deliverables, milestones, and dates, no later than December 31, 2001.**

Qwest filed an implementation plan on December 28, 2001, in response to this recommendation to address the eight prior recommendations as presented by HP. As the above responses to the recommendations indicate, Qwest has addressed or is addressing all of the recommendations presented by HP.

This recommendation has been met.

B. RECOMMENDATIONS FROM HP'S SATE NEW RELEASE TEST SUMMARY REPORT

1. **Recommendation 1: All issues that have a status of "Closed-Unresolved" or "Open" as of the distribution of this document be incorporated into the SATE User Group and CMP process.**

HP has successfully closed all SATE issues. Only one issue remains in 'closed-unresolved' status, HPSATEEV2032. HP discovered an issue with an error message returned for a Facility Availability Query. The error message returned did not match the expected error as defined in the Data Document. Qwest modified SATE to correct this after HP's re-testing was complete. Consequently, HP believes this issue should remain closed-unresolved, but it indicates

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[12] Service Performance Indicator Definitions (PID) – AZ 271 Working PID Version 7.0.

in the Issue response that it "doesn't feel that the resolution of this issue will significantly impact the findings of the transactional test results."[13] SATE has been corrected and there is no longer a mismatch between the Data Document and the actual error message returned. Therefore, this issue has been closed.

This issue is not a candidate for discussion at the SATE Users' Forum and/or in the monthly CMP meeting because it relates to a specific error message that has been corrected in 9.0 and forward.

2. **Recommendation 2: Supporting documentation be provided to more clearly clarify the calculations and measurement process of PID PO-19.**

With the proposed updates to PO-19 to include a sub-measure to further measure production likeness, Qwest has submitted a revised PID to the Arizona TAG. As is standard with all proposed PID changes, the TAG members will collaboratively review and approve the proposed language, which will include the agreed-upon level of detail concerning the calculations and measurement process. This recommendation will be met once the updated PO-19 PID is agreed by Qwest and the CLECs.

3. **Recommendation 3: Qwest should consider asking CLECs to submit data requests for negative scenarios and BPL edits for key transactions. Qwest provide a clearly defined process to ensure timely resolution of production mirror issues encountered by CLECs during post SATE certification.**

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[13] HPSATEEV2032.

In its comments on CGE&Y's Final Report and Staff's Final and Supplemental Reports, dated May 17, 2002, Qwest agreed to add this topic to the next SATE Users' Group agenda for May 21, 2002. This action was to solicit feedback from the CLECs concerning their needs for negative testing of BPL edits and to include negative scenarios testing consistent with the CLEC needs expressed at the Users' Group meeting.

Qwest discussed negative testing with the CLECs in attendance at the May 21, 2002 SATE Users' Group. CLECs decided that specific error responses should not be required testing. Reasons for the decision are as follows:

- Currently, Qwest requires negative testing. Specifically, CLECs must test the ability to receive a reject response for each pre-order query, and for both ISC and BPL rejects on order transactions. Exact errors received can be any valid Qwest Legacy System error;

- Adding more negative testing scenarios to the Data Document would obligate CLECs to test for specific errors and add to the work effort to test new releases;

- Currently, CLECs may test additional, specific negative responses by using the data request process. Qwest would provide the data necessary to receive the desired error. Hence, CLECs already have the option of performing more negative testing should they choose to do so; and

- Current testing requirements do not enlarge testing work efforts and still afford CLECs the opportunity to do additional negative testing.

In this discussion, it was clear that CLECs did not want additional negative testing scenarios added to the Data Document.

Additionally, HP recommended that Qwest provide a clearly defined process for production mirror issues encountered by CLECs after SATE certification. Qwest already has the process in place. It is the CMP production support process.[14] Section 12.2 of the CMP document states: "Problems encountered by the CLEC should be reported to the IT Wholesale Systems Help Desk (IT Help Desk). Qwest will monitor, track, and address troubles reported by CLECs or identified by Qwest."[15] This process applies to both production releases and SATE.

This recommendation has been met.

4. Recommendation 4: Qwest include scenarios in Data Document reflecting all business rule changes identified in the New Release change summary documentation.

Qwest proposed to implement this recommendation based upon the candidates for a release, instead of each individual change in the change summary. The candidates for a release encompass all of the major changes. Once the release candidate list is available for the upcoming release, Qwest will provide this list to the CLECs through CMP. In the Data Document for the new release, Qwest will identify which associated existing test scenario will appropriately test each SATE release candidate. In the cases where a new candidate does not yet

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[14] http://www.qwest.com/wholesale/cmp/redesign.html

have an associated SATE test transaction, Qwest will create a new transaction and provide that information to the CLECs as well. Any new transaction will be included in the new section of the Data Document. CLECs can elect to run these transactions to complete their re-certification testing requirements. If they do not plan to use the new functionality provided by a candidate, CLECs can use the existing transaction for the product and activity. The candidate review section of the Data Document will be specific to a release of the document.

This approach will allow CLECs to test the major changes in a release without the burden of processing through the many individual changes that each candidate causes. The appropriate associated SATE transaction(s), new or existing, will be identified to test the changes for a release, referenced in the Data Document, and made available for re-certification testing.

To ensure that this proposal provides the CLECs the greatest value in providing test scenarios for a new release, Qwest presented the proposal in the May 21, 2002 SATE Users' Group meeting for CLEC input. In this meeting, the CLECs agreed that this approach was appropriate. In addition, in response to a CLEC request during the meeting, Qwest published the new section of the Data Document for 10.0 ahead of the normal Data Document publication cycle on June 3, 2002. This was added to the Data Document with the June 14, 2002 publication.

This recommendation has been met.

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[15] Wholesale CMP, section 12.0, which can be found at the following URL: http://www.qwest.com/wholesale/cmp/whatiscmp.html

C. STAFF RECOMMENDATIONS

1. Recommendation 1: Qwest should be required to immediately enhance the range of capabilities available in SATE to provide for negative testing by CLECs

As detailed in Qwest's response to HP's Recommendation #3 above, Qwest discussed this topic in the May 21, 2002 SATE Users' Group meeting to solicit feedback from the CLECs concerning their needs for negative testing of BPL edits. CLECs indicated that they require no additional negative testing. This recommendation has been met based on the input of CLECs utilizing SATE.

2. Recommendation 2: Qwest should be required to demonstrate by the time the Commission rules on SATE's adequacy, that it has incorporated all error codes and variances that exist between SATE and production into a single report as originally requested by HP.

Qwest has published one single list on the Wholesale website, effective May 23, 2002. Additionally, the 10.0 single variance list was published to the Qwest website on June 17, 2002.[16]

This recommendation has been met.

3. Recommendation 3: Qwest should be required to report to the Commission on a quarterly basis, the status of its progress in implementing the recommendations of Staff and HP.

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[16] http://www.qwest.com/wholesale/ima/edi/document.html

This report serves at the first status report to the Commission concerning the status of progress on these recommendations. Qwest will continue to file quarterly reports on in-progress recommendations.

D. CONCLUSION

As detailed in this report, all but two of the recommendations are fully implemented. The remaining two recommendations are near completion in a collaborative effort with the CLECs, and an updated status will be reported in the next quarterly report, which will be provided no later than September 27, 2002.

BEFORE THE ARIZONA CORPORATION COMMISSION

IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH SECTION 271 OF THE TELECOMMUNICATIONS ACT OF 1996.	)))))	DOCKET NO. T-00000A-97-0238 OSS FINAL REPORT WORKSHOP 10

REPORTER'S TRANSCRIPT OF PROCEEDINGS

VOLUME II
(Pages 137 through 268)

Phoenix, Arizona
April 18, 2002

ARIZONA REPORTING SERVICE, INC.
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Prepared for:

INDEX TO EXHIBITS

NO.	DESCRIPTION	IDENTIFIED
	CGE&Y 10-5 AZ 271 CMP Report Supporting Documentation, 3/28/02, CD 1 of 1	14
	CGE&Y 10-6 - CONFIDENTIAL Floppy disk: FTRC Ad hoc Files Retest, Reconciliation - FTRC, P-CLEC Data Files/Retest	14
	CGE&Y 10-7 - CONFIDENTIAL Supplemental DUF Evaluation Retest, Call Detail Logs	135
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BE IT REMEMBERED that the above-entitled and numbered matter came on regularly to be heard before the Arizona Corporation Commission at 5090 North 40th Street, Phoenix, Arizona, commencing at 9:10 a.m., on the 18th day of April, 2002.

ATTENDEES:

For Doherty & Company:

Hagood Bellinger
Phil Doherty
Martin Skeer

For the Commission Staff:

Maureen Scott

For Cap Gemini Ernst & Young:

Ed Wynn
Bob Dryzgula
Liz Lehr
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For WorldCom, Inc.:

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Becky Oliver
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Tom Priday (Present telephonically)

ATTENDEES:

For AT&T Communications of the Mountain States, Inc.:

Rick Wolters
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Ken Wilson

For Qwest Corporation:

Andy Crain
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Jeff Thompson
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Alan Zimmerman
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Steve Quarles
Angela Wade
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Louise Ng
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CCR No. 50528

MR. DRYZGULA: Can I have two minutes to excuse the folks that don't need to stay for that. I don't want to be disruptive while you're having your conversation.

MR. BELLINGER: I assume you don't need Cap Gemini anymore.

MR. DRYZGULA: Susan and I are staying.

(Discussion off the record.)

MR. CONNOLLY: There's one more item that we have.

MR. WOLTERS: The DELIVER issue.

MR. WYNN: We haven't had a chance to draft the language yet. As I said yesterday, I'll try to get to it by Friday, but if not, definitely by Monday. And what I do, I'll just e-mail it around.

MR. WOLTERS: Very well.

Ed, I've got a question. Your CGE&Y 10-2 is DELIVER Change Management Technique. I assume -- you never marked this confidential, so I assume it is not a confidential or proprietary document.

MR. WYNN: It is not a confidential or proprietary document. However, it does have a restriction on that. And our position would be that that legend would not change, either, because that is not part of the R that is responsive, and -- I'll see

[intentionally omitted]

(Discussion off the record.)

MR. BELLINGER: PO-19 discussion I assume is where we are. Qwest, I think, wants to open with a proposal, so we'll let them open with a proposal and then take other counter proposals.

MR. BUHLER: We think we have a proposal that

will help kind of bring us to a point of resolution for PO-19 because after discussion in the ROC and discussion in Arizona, adoption of the PID in the ROC and adoption of the PID in Arizona, there continue to be difference of opinion about what was intended, what was said. And it doesn't seem like that's getting resolved. We recognize that having transactions that run in a production environment and using those results in our performance measurement reporting is important.

So what we have done is sent a team of people to look at that, knowing that that mirroring aspect is important. And we will bring back a detailed proposal on that aspect of our performance measures. The team is in the process of looking at that. And so with implementing a new reporting capability, there's always planning that needs to be done and work that needs to be completed. So the details we don't have ready to share with you, but we will be bringing that back.

What we thought would be helpful so that when we do bring back the details of our proposal and our response can be responsive and hopefully bring us to a quick point of agreement, we thought it would be worth spending some time discussing with you what you view

in that mirroring production, what that means to you so that we have a better understanding, and then we'll bring back the details.

MR. WOLTERS: AT&T put together something last night that kind of goes through some of the issues that we think need to be addressed discussing PO-19. So we'll hand that out, and it will serve as an outline for our discussion.

MR. BELLINGER: Do you want to mark this as an exhibit or --

MR. CRAIN: I think it would help to mark it.

MR. WOLTERS: Okay. I think we've marked one exhibit. We'll mark this as AT&T 10-1, and it's entitled Operational Requirements for PID PO-19.

You can go ahead and start, Tim.

(Discussion off the record.)

MR. BELLINGER: Do you want us to break for five minutes?

MR. CRAIN: Yeah, why don't we do that.

(Recess taken.)

MR. BELLINGER: We're back on the record.

MR. BUHLER: Tim or Ken or whoever's going to walk us through, we thought it would be helpful for you to kind of walk through the three pages to make sure that we understand so that we can take it into

account and go forward from there. So if you wouldn't mind walking us through to make sure we understand, that would be helpful.

MR. CONNOLLY: Sure.

Section A addresses what we see as the way SATE would get set up for a new release contrasted with when we get to paragraph B, it would be the more continuing use of SATE after the new release is established. So what we see here is sort of rollout from your internal systems testing and development laboratory to -- on its way into production use for CLEC users but also the path that would be followed to implement the production software in SATE.

And the note that there are some timing requirements that would be placed in here, and those we extracted from existing PO-19. The 30-day window that is called for in PO-19 now and the testing within the five days for the implementation of the new release is also taken out of existing PO-19.

So it's sort of a step-by-step type of thing where you establish the SATE environment for testing, you execute the test bed through that, catalog or baseline the results, and then you'd use that as the basis against which to determine that ongoing executions of the test bed through SATE do in fact

match the output of production. So you've got the -- essentially the mirroring technique.

So that's how the new release element of the SATE is built and the initial verification of the SATE environment as contrasted against the production results would be achieved.

The next section, which is paragraph B, goes to the continuing use as we go month by month through execution of SATE as is done -- as it's done today. The 15th of the month or the nearest working day to the 15th, that's language that's taken right out of PO-19. And here we've got the execution of each release compared against its baseline outputs so that we've got the ability to take continuing CLEC use, continuing SATE use, and evaluate that against the existing releases that are in production.

So, for example, we would have the SATE run of the test data for IMA Release 8 would be compared against the production equivalent for IMA Release 8, and successful transactions would be those that match -- successful SATE transactions would be those that match the production equivalent for Release 8, and the same for Release 9 as it rolls forward.

We thought it was appropriate to take a look -- in paragraph C, to take a look at current impasse

issues that we have that we've submitted for resolution. In particular, we've got the impasse issue of should there be a test -- should HPC conduct the Phase IV testing. And we think that our suggestion here goes to addressing that. It does it in terms of Release 9 just because that's sort of in front of us. But what we suggest here is that rather than having HP go and get certified for all the products that are in the SATE test bed that Qwest should be able and is capable of doing that, executing the tests through the production environment and have HP observe that and do the evaluation of the production results against the business rule documentation, the I-Charts, development worksheets, so on and so forth. But to provide that certification over the first established baseline results for the new release so we've got a verified set of results against which we'll go forward. So that's what Section C tries to do, is points a try to resolve the impasse.

And in D, we took a look at PO-19 and how it's currently constituted to average the three different sets of executions and provide -- we've got one benchmark now. This suggestion says you take two releases that are the older ones, take the SATE

results from those ones and aggregate those and treat those at a 98 percent standard, recognizing that they're likely to be stable, should be stable, and any corrections over time should have been behind us.

And looking at the newest release, recognizing that there is perhaps start-up problems, perhaps data problems, perhaps any other sorts of problems, and keep those out of that aggregation, keep it on a separate track, separate disaggregation from the most current release and measure that with a 95 percent benchmark and not 98 that you do for the other older releases that are more mature.

So that's what this recommendation is for a way to get the SATE environment such that it mirrors production and kind of gives you a way to get there from here.

MR. BUHLER: Okay. Let me -- I'd like to just recap to make sure that I kind of understand. Your Section A -- and I'm going to use 9, 8, and 7 as -- 9 the new release and 8 and 7 as the older releases.

Your paragraph A would have us run transactions in SATE in production for just Release 9 as the new release within five days.

Paragraph B would have us run SATE

transactions and production transactions for the older releases, Release 7 and Release 8, on the 15th, around the 15th.

C would have us have an equivalent of Phase IV testing where Qwest would run the transactions, it would be verified by HPC on a one-time basis.

And D would have us break out the benchmarks of the two pieces, one for the new release and one for the two older releases averaged together.

Is that the gist of the proposal?

MR. CONNOLLY: Let me point out something else about B. When you get to the second month, Release 9 is tested in the same manner as 7 and 8 are because it has now rolled over, there is no current brand new release. 9 goes into the same track as 7 and 8 does.

MR. CRAIN: Does the standard stay at 95 for the second month or until the next release?

MR. CONNOLLY: Until a new release would come, that most current release stays at 95. As you go through the versioning, there's a shifting of the oldest goes off, and the newest gets replaced by a new newest.

MR. CRAIN: The HP testing or -- testing is a very bad word for what they'll be doing here. HP will

be evaluating under your proposal the numbers we're producing and verifying the results of this new PID. Am I correct?

MR. CONNOLLY: I don't believe so.

MR. CRAIN: What are they doing?

MR. CONNOLLY: What we suggest HP's role here is to observe the initial run of the test data through production for Release 9 and verifying that the results of production are equivalent to those published in I-Charts, developer worksheets, business rule documents, et cetera. They would certify that the production data that now gets cataloged as the baseline is an accurate reflection of what should have happened. If there's any discrepancies in HP's analysis of that, they have to get resolved through observations or trouble tickets or something so that the output of the Release 9 initial run is an accurate reflection of what production is. They do not audit the calculation of PO-19.

MR. CRAIN: And they are not doing anything other than what you just said. There's no IWO process, there's no Final Report that comes out, there's no questions on the Final Report, no workshop, no hearing, et cetera?

MR. WOLTERS: I think we assumed that they

would issue a report that explained the process you went through and the process they went through to verify everything was in order so everybody could see what they did and understand what they did. And so when we get to the next time you run a production run, we know that we understand the process that you use. So I think we would expect a report.

I think they have to point out problems -- I mean, we can talk about whether they have to actually issue IWOs or make sure they're corrected so when the report comes out, they could say that all discrepancies have been resolved. I'm not so sure we have to go to the level of an IWO, but they can't ignore them. They have to make sure problems are corrected. And I'm not so sure -- we didn't really discuss the workshop issue.

MS. SCOTT: Rick, I think it would be Staff's position that any report that's issued by HPC would be separate and apart from this process and would not be handled through this 271 case.

MR. WOLTERS: We didn't go that far, Andy, in our thinking. We did put in there, they would issue a report on the evaluation, but we didn't think past that.

MR. CRAIN: Okay. Start thinking because --

MR. CONNOLLY: Do you want to guide our thinking?

MR. CRAIN: No IWOs, no process for submitting questions, no documentation room, no holding up the 271 case for the results of this analysis.

MR. WOLTERS: We have to talk about that. I mean, we'll try to be as flexible as we can. But you don't have a problem with HPC issuing a report to explain what they did, what you did, what came out of it. That's kind of what -- we're trying to replace Phase IV testing. Phase IV testing would require a report. We're trying to find a way to simplify that, but at the same time, we really think there needs to be something that's a work product from that from HPC.

MR. CRAIN: Would this resolve the impasse issue or is there anything else left on your side of the impasse issue?

MR. WOLTERS: I think VICKI and flow-through.

MR. BELLINGER: We've already issued that.

MR. WOLTERS: That's right. I think that would cover it.

MR. DRYZGULA: Could I ask a couple questions.

MR. BELLINGER: Sure, Bob. You get a chance

to ask some questions.

MR. DRYZGULA: Mr. Connolly, I'm just kind of puzzled about a couple of things.

First one is: If the transaction set, just to make the math easy, was 20 transactions, and one of them did not mirror production, then the evaluation of that particular release would be 95 percent accuracy according to the formula in the proposed PO-19, correct?

MR. CONNOLLY: Correct.

MR. DRYZGULA: So on its initial run, let's say it was transaction No. 20. And then the next month when you run this thing, for whatever reason, transaction No. 15 doesn't match or mirror production, but transaction 20 does. That yields 95 percent even though one problem mysteriously went away and another problem mysteriously manifested itself. And you consider that equivalent result for measuring the PO-19?

MR. CONNOLLY: That's right.

MR. DRYZGULA: Now, new functionality that gets put in is either brand new functionality that never existed before and in the case of a GUI-based transaction would most likely be a brand new transaction. That's easily segmented. But looking

over previous IMA releases, it most often manifests itself in additions or changes to existing screens or additions to new fields. How do you separate that transaction set in this proposal from the previous transaction set when it's the same transaction, just with a little more functionality added?

MR. CONNOLLY: First, SATE is used for EDI testing.

MR. DRYZGULA: Right. Sorry.

MR. CONNOLLY: So the screen problems and the window of access, that kind of goes away.

But as each new release is introduced, there are amendments -- there's a new data document that brings forward those that were in the data document and then adds to it those that correspond to new features, functions, products and so forth.

MR. DRYZGULA: Let me ask the example question a different way. Inside the envelope of an 850 transaction, if the formatting that's inside there, say, for the address changes but it's still just an address validation transaction, it's the same transaction and the same transaction number that was in the previous set, how do you segregate that in this proposal the new from the old?

MR. CONNOLLY: If the test data is processed

through -- in this discussion, the Release 7 environment, you've got Release 7 results. And those say what they say. And you've got Release 8 results, which are a different set because there's different data, different features. And 9 is another set.

MR. BELLINGER: Any other quick questions? Because HP has -- you asked them to make a recommendation as well, and so we'll get them to pass out theirs. This was our request. Don't blame HP for this other than this is a recommendation they make. And it has a lot of similarities, but there are some differences.

(Discussion off the record.)

MR. CROCKETT: Let me go ahead and identify for the record this document that I've just distributed. It has been marked HPC 10-9, and it is entitled PO-19 Stand Alone Test Environment (SATE) Accuracy.

MR. BELLINGER: You had a question, Andy?

MR. CRAIN: If AT&T feels that it's so important for HP to do this evaluation, is AT&T willing to pay half of the evaluation?

MR. WOLTERS: No.

MR. BELLINGER: The evaluation is really just -- the way I understand it is the verification so

everybody understands the PID.

MR. CRAIN: Is AT&T willing to pay for half of the verification?

MR. WOLTERS: No.

MR. BELLINGER: You would execute the test. They would just be verifying the results.

MR. CRAIN: Who is going to pay for HP to do the verification of the results.

MR. BELLINGER: It's no different than any other PID that we've been putting in. Verification that it's accurate. And we understand that --

MR. CRAIN: You mean Qwest?

MR. BELLINGER: Well, I guess so.

MR. WILLIAMS: Is this a long-term PID administration issue? I'm thinking also in terms of PAP where sometimes the costs of this kind of a thing, an audit is allocated to be paid out of a fund that the PAP is building from penalties paid.

MR. BELLINGER: You think there will be something in there?

MR. WILLIAMS: I don't know. I don't remember the details, but I just know that that kind of thing has been covered, and I'm not sure how much of it applies to Arizona, but that kind of thing.

MR. BELLINGER: I understand. I just know

that there wouldn't be any money in it.

MR. WILLIAMS: Well, we hope not much, but it's a pretty stringent PAP, so maybe there will be at first.

MR. WOLTERS: I think what we're losing sight of here is this all started coming out of the issue of whether there should be a Phase IV in the test of SATE 9.0 or not. And, of course, Staff apparently gave them the advice that they should scope it somewhere in regard to PO-19. But we don't look at it as a PID issue, we look at it as a SATE issue. And PO-19 just got rolled into the discussion. But we look at this reviewing whether the -- HPC reviewing the production as part of the SATE 9.0 test, not necessarily something that is being driven by PO-19, although PO-19 is affected. So I'm not so sure that's something that's covered by the PAP just because PO-19 is affected.

MR. CRAIN: And what I'm looking at is that Qwest is approaching having spent almost $200 million on OSS test vendors over the last several years; and at some point, it has to stop. And at some point, if these issues are so important to CLECs, CLECs are going to have to start chipping in. And I understand your answer in terms of you're not willing to do that.

MR. WOLTERS: I guess, just to conclude on that, Andy, if you don't like -- again, what is it, Section C, that if that's rejected, then we're really back to just leaving the impasse issue on Phase IV in the hands of Staff. That's really where we're at.

MR. CRAIN: And I think what we're going to have to do is take a look at this and tee it up in the TAG meeting again next week.

MR. BELLINGER: I would hope that you'd come back with your PO-19 proposal.

MR. CRAIN: Yes.

MR. BUHLER: I think it would be helpful for HP to outline any differences in its proposal from AT&T's just to make sure that we understand the differences.

MR. BELLINGER: Can you all do that?

MR. KOERNER: Sure. And I'm hesitating here because I'm still trying to struggle to understand what AT&T says should be done.

MR. BELLINGER: Tim will give you his phone number, unless you've got a quick question.

MR. KOERNER: There's a couple thoughts that come to mind, and then we'll backtrack to see what's the objective we're trying to solve.

The first question or concern I have is that

the way you've written it up implies then that the production release is available before the production release is scheduled to be released. So I'm not sure how you resolve that issue.

MR. CONNOLLY: That's consistent with PO-19 now. It's consistent with SATE now, let me put it that way.

MR. KOERNER: But what exists now is that the functionality of a new release for production is available in SATE 30 days before the actual production release goes in.

MR. CONNOLLY: Correct.

MR. KOERNER: You're asking to baseline these transactions in production, which means production has to be available before you can do it.

MR. CONNOLLY: The production software -- as we understand the SATE engineering, the production software system is available 30 days before it's turned on for CLEC use. And that's the production software that goes into SATE to allow the initial test run to generate the results reflecting production.

MR. KOERNER: Correct.

MR. CONNOLLY: And that's -- so 30 days before it turns up live, there's an opportunity to use that software. One of the uses of it is to execute

and create the baseline results.

MR. KOERNER: Again, to further clarify, from what we understand, what goes in the SATE 30 days beforehand is effectively the EDI maps that will be used in the production release and the business logic relative to the scenarios that are listed in the data document. But that does not mean that the production release is ready at that time, production release of the EDI software. You're taking the functionality for that new release and putting it in SATE, which, from my understanding, is the maps that will be available on that day production release is ready plus whatever business logic applies to the scenario.

MR. BUHLER: So can I try this just to be sure we have the essence.

You have a three test phase approach. You have transactions that you would run in production and SATE five days after the SATE release. And that's called your testing window. And then you do that again five days before that release rolls into production, and that's your prewindow. And you do it a third time five days after that production release, and that's called your post window. Is that okay so far?

MS. NG: That's true, Dean. Each one of the

phases you've described, though, presents different results. The first two phases, five days after SATE is deployed, the new release is deployed into SATE is for verification of the SATE data document.

The second one is a stability phase to reverify five days before deployment that SATE hasn't changed. That's just the data document expected result verification.

The third phase that we're talking about is the production mirror event, that once production is deployed, SATE scenario expected results are compared to like scenarios in production five days after production is available.

So the variance that I'm seeing -- and I'm not sure I understand AT&T's proposal. But the difference I see is that the expectation of the AT&T proposal is that production is available 30 days in advance in some interim location in your software environment that can be compared to SATE that was made available 30 days in advance. Because HP has not utilized that, there is a production like environment available 30 days in advance to be baselined to SATE. So I wanted to see if we can clear that up.

MR. THOMPSON: One question: What's the purpose of your test -- what is the difference in the

-- purpose of the difference between Phase I and Phase II of your testing proposal?

MS. NG: The reason that HP is prescribing that is based upon reviewing the FCC orders for the need for stability in the test window for 30 days. So the results should remain the same is what the expectation would be there.

MR. KOERNER: And, again, everything that we've addressed here, we have based these recommendations or suggestions based on what we have seen the FCC consider in other states that have been approved when it comes to a testing environment and what a testing environment should do to support CLECs for new releases. Things that we did see were things like it has to be available ahead of time, it has to remain stable. That is, if there are no changes to the functionality between when it's released and when production goes into release. And then the third part is the question about -- the million dollar question on adequate mirroring to production.

We believe that in doing our Phase I and Phase III has accommodated two of those things. One was that it was available, the other was that we verified that it was stable.

MS. NG: And that we verified that the

IMA-EDI disclosure documents are incorporated because the expected results match the data document.

MR. KOERNER: The challenge has been that the scenarios described for SATE are based on the business rules that are in the new release disclosure documents, which should indicate that if I want to order this new product, here are the rules, here are the fields that I have to supply in order to complete an order, which is the same information that's used to establish production. But we realize that there is a concern that since the two are not the same systems, you're relying, then, on the documentation to be accurate to say that there is a mirror to production as opposed to if you run the like scenarios in the two systems, that gives you an additional layer of comfort, if you will.

So we have been challenging how to resolve the issues. We can understand the concern about not actually having tested it in production to give you that level of comfort. This was one way we could think of that would provide a vehicle to provide that level of comfort. But there are challenges doing it because you obviously can't do this comparison until the production release is available.

MR. BUHLER: So, Tim, on your A again, your

A, which is the test within 30 days, the implementation is 30 days before production, can you clarify again what that test is since production is not yet available?

MR. CONNOLLY: It's our understanding that the production software is installed in SATE for CLECs to use 30 days prior to that release being implemented. And that SATE production window allows for the test data to be executed in a way that mirrors what will be the production environment in 30 days. So it's first installed there, and then in five days, the test data is run in the SATE environment, and the results are compared and reported out in PO-19 per any discrepancies.

MR. BUHLER: Compared to the data documents?

MR. CONNOLLY: Compared to the production -- the test data run through the production system in SATE.

MR. BELLINGER: Any more questions?

MR. BUHLER: I do. I'm still not understanding the feasibility of your paragraph A.

If you run SATE transactions after you install the new release in SATE and you get results, that version is not going to go into production for 25 days. And so you're not going to have that version in

production to run transactions through in that time frame. You would have to wait until that new version is rolled into production before running your test. But you seem to be saying that you run your production transactions before that version is rolled into production.

MR. CONNOLLY: Yes. Because, as we understand it, the production system is available for testing 30 days before implementation.

MR. BUHLER: In SATE.

MR. CONNOLLY: In SATE. So you execute the transaction --

MR. BUHLER: In SATE.

MR. CONNOLLY: With the order queries, LSR, and you're going to get the outputs, be they query responses, FOCs, rejects --

MR. BUHLER: SATE responses.

MR. CONNOLLY: And VICKI responses and whatever. So you have those. And that now establishes what is the expected results of production processing. You took that very same order 30 days later, put it through production, that's the result you need to have.

MR. BUHLER: So you're waiting 30 days before executing transactions in production?

MR. CONNOLLY: You'd have to.

MS. NG: So now what I'm hearing, Dean -- from an HP perspective, I want to make sure that I've interpreted it correctly this time.

What I'm hearing is 30 days in advance of the production deployment of a new release, the SATE environment is updated. On 25 days, five days after that update to SATE, we run the test deck. We get output. That output is the baseline to be compared to 25 days later when production is available.

MR. CONNOLLY: Correct.

MS. NG: So we're saying the same thing. That's our Phase IIID.

MR. DRYZGULA: Hagood, a couple quick questions.

MR. BELLINGER: You like this asking questions.

MR. DRYZGULA: A new experience for me.

MR. BUHLER: Bob, I have one or two more.

MR. DRYZGULA: Let me ask mine because I bet it's going to be the same thing.

I'd like to ask HP to explain their formula and the reason for it.

MS. NG: Which formula? So Formula No. 1. The total number of successfully completed test

scenarios in the test suite compared to the total number of transactions executed overall as a percentage.

MR. DRYZGULA: And that would -- would I be characterizing it correctly, is that the same as AT&T's proposal?

MS. NG: There's a disaggregation -- that formula is performed in a disaggregated methodology by the test phase, test type, and the IMA release.

MR. DRYZGULA: Agreed.

MS. NG: It's very similar to AT&T's. It's maybe a little bit more elaborate.

MR. DRYZGULA: What about No. 2?

MS. NG: Hold on just a second.

Our Formula 1 is a SATE-to-SATE comparison. Our Formula 2 is a SATE-to-production comparison. So our Formula 2 is similar to AT&T's proposal. AT&T has not made a proposal similar to our proposal 1.

MR. BUHLER: Your product recording, do you end up with three PID test phase, test type, IMA-EDI release?

MS. NG: That's three. Then there's the test type: a loop, a POTS.

MR. BUHLER: So you have two formulas, you have four disaggregations. So you have eight results

for three tests, which is 24.

MS. NG: That's true.

MR. KOERNER: And these are just discussion points, just recommendation.

MR. BUHLER: And I'm just trying to make sure I understand so that we can go back and incorporate it into what we bring back to the TAG.

MS. NG: The product reasoning is that the accuracy rate from -- I guess comparison to other jurisdictions, there has been a requirement for looking at the results by product because of the market opportunities and the usage of certain products in certain locations may be stronger or lesser in value to the results of the test.

So it may be that UNE is more -- there's more usage of UNE and maybe that percentage is -- to look at the results as by product is more accurate so that you can see the impact overall.

MR. CONNOLLY: I have a question, Louise or Bill. Would it appear that your proposal does not address ongoing testing of existing releases? Is that correct?

MS. NG: This is a monthly reporting, so it would effectively do this test for Formula 1 each month, which would be the releases that always exist

within SATE that are available.

MR. CONNOLLY: But your phases -- are you saying that the third bullet point in your phase section of the description, that is run on a monthly basis?

MS. NG: Can you restate that. You're asking if Phase III is eliminated at any point?

MR. CONNOLLY: I'm asking if the third bullet in the phases section of your description, if that test described there is run monthly.

MS. NG: Yes.

MR. CONNOLLY: Bullet point 1 and bullet point 2 --

MS. NG: Yes.

MR. CONNOLLY: Monthly?

MS. NG: Yes.

MR. THOMPSON: How do you do that?

MR. CONNOLLY: How would you do that unless there's a release?

MS. NG: If there was no release, the month is marked as non-applicable. So I think the original description that's up here at the top says that in months where no release activity occurs, the measure will be recorded as non-applicable.

MR. BUHLER: To me, that means one time, and

you perform it in the month when you have a new release.

MS. NG: Once again, this is for discussion. It's our recommendation. It's not -- you could be run in each month and it's something that you need to -- you all need to negotiate.

MR. VIVEROS: But your recommendation as written would in fact be executed the month there was an actual system release?

MS. NG: Yes.

MR. BUHLER: I have just one more question, I think. Does HP see that it has some kind of verification role in its proposal like you have in AT&T's, or is this simply a proposal for going forward within the PID?

MS. NG: This is just language.

MR. DRYZGULA: I have just one more question.

From the CLECs' -- I guess the question is for Qwest. From the CLECs' perspective, based on the description that Mr. Connolly gave earlier, 30 days prior to the release, they're going to be hoping to run production like tests through to verify the new functionality. At what point will they get the release notes that describe the exact components of that functionality? Would it be back measured from

the release date or back measured 30 days before when the so-called production version goes onto SATE? Do you understand that question?

MR. THOMPSON: Yeah. Under the current schedule adopted in the CMP discussions we've had, the CLECs will receive their draft specifications for release 78 days prior to the release going live in production. They'll receive their final specifications 45 days before going into final production.

MR. DRYZGULA: Has that been adopted or is that just the proposal at CMP?

MR. THOMPSON: That has been adopted.

MR. DRYZGULA: Okay.

MR. CRAIN: Actually, last week we sent out the release notes --

MR. THOMPSON: We call them draft technical specifications is the language that's used.

MR. CRAIN: For 10.0, which is 78 days ahead of the release.

MS. NG: Are those business days or calendar days?

MR. THOMPSON: Calendar days.

MR. BELLINGER: Any more? So you're going to send us a recommendation from Qwest sometime before

the TAG meeting hopefully? At least maybe the afternoon before?

MR. BUHLER: I don't know, Hagood. We're going to have to go back and talk about these things. We'll do what we can. We'll bring what information we have at the TAG. If it's possible to do anything in advance, we will, but I don't think we can get to it.

MR. BELLINGER: All right. It would be helpful.

MR. BUHLER: We understand.

MR. BELLINGER: Okay. Any other issues or discussion points?

MR. VIVEROS: As a possible reconciler to your request, Hagood, given the fact that tomorrow will probably be a travel day for a lot of us and that would only give us Monday, we would certainly look at the possibility of moving the TAG so that materials can be sent out in advance and give the CLECs the opportunity to review the materials and have a more substantive discussion.

MR. BELLINGER: Anybody want to do that?

MR. CONNOLLY: Moving it a week?

MR. BELLINGER: Move it a week?

MR. CONNOLLY: That would be April 30.

MR. BELLINGER: Yeah, April 30th.

Is that all right, Dean? Andy? April 30th for the next TAG meeting?

MR. CRAIN: Yes.

MR. BELLINGER: Two weeks from -- a week from Tuesday, then.

Everybody else approve of that?

MS. NG: You're moving it out a week?

MR. BELLINGER: Yes.

MS. NG: HP wants to ask one more question just to make sure that when we come back together that we have the right understanding of what we're trying to accomplish.

I keep seeing us get into kind of a conundrum about what production mirror means. And I wanted to make sure that we understood the -- AT&T's proposal, the aspect of what they mean by pass or fail and how production mirror -- what is in the baseline and what that baseline -- is it just the transaction data or is it the documents or what is it all inclusive of so when we actually decide what a pass or fail is, we're all on the same page. So when we get back together, we don't have to go through that criteria issue.

MR. CONNOLLY: Our view of the outputs are the EDI messages that reflect the processing of those transactions.

MS. NG: When you say EDI message, could you elaborate at all on what you mean there. Is it just the message or what's in the message, or is it the documentation that supports the message or --

MR. CONNOLLY: It would be the 855 transaction that says, here is a firm order confirmation for that LSR, and it has all of the segments and other things that come on those 855 messages.

MS. NG: It's really -- I'm a detail person, I apologize --

MR. BELLINGER: I wonder if we need to get into this much detail.

MS. NG: I think that might be an issue as to how to qualify a pass or fail.

MR. BELLINGER: Bob, you all will send out a notice on the TAG meeting?

MR. DRYZGULA: What date?

MR. BELLINGER: April 30th.

MR. DRYZGULA: Do we have Staff's concurrence?

MR. BELLINGER: Yes.

MR. DRYZGULA: I'm going to say Hagood Bellinger said in the message.

MR. BELLINGER: No, no, no. Those present in

the workshop decided.

MR. CONNOLLY: Hagood, the meeting that was planned for the 23rd was at 8:30. And the one for the 30th would be at 8:30?

MR. BELLINGER: I assume so.

MR. WOLTERS: Hagood, AT&T will send around its proposal to the Sedona mail for distribution, and we ask that HP do the same.

MR. BELLINGER: Okay.

That concludes the workshop.

(The workshop concluded at 2:50 p.m.)

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, CAROLYN T. SULLIVAN, Certified Court Reporter No. 50528 for the State of Arizona, do hereby certify that the foregoing printed pages constitute a full, true and accurate transcript of the proceedings had in the foregoing matter, all done to the best of my skill and ability.

WITNESS my hand this 22nd day of April, 2002.

CAROLYN T. SULLIVAN, RPR
Certified Court Reporter
Certificate No. 50528

ARIZONA CORPORATION COMMISSION
Impasse Issue: SATE (Master Issue #942)

A. Introduction

At the February 22, 2002 Test Advisory Group (TAG) meeting AT&T, WorldCom and Qwest reached an impasse on two principle issues related to the evaluation of Qwest's Stand Alone Test Environment ("SATE") recently performed by Hewlett-Packard Company (HP). The parties defined the two issues at impasse as follows:

- VICKI Testing -- HPC's testing and evaluation of SATE Release 9.0 should include specific testing of VICKI (Virtual Interconnect Center Knowledge Initiator) capabilities
- Flow-Through Testing – HPC should conduct an evaluation of the new SATE Flow- Through process that will be available in SATE at the time the IMA EDI Release 9.0 is implemented

B. Background

In August, 2001 HP was directed by the Arizona Corporation Commission (ACC) to conduct an evaluation of Qwest's SATE. Previously, CGE&Y had found the testing environment afforded to CLECs by Qwest to be inadequate. Qwest responded by introducing a SATE for use by CLECs in Arizona. Since Qwest had not before made a SATE available to CLECs, the ACC concluded that an independent evaluation of the SATE was required and ordered HP to perform it using the current set of technical capabilities as the baseline for evaluation. This translated to HP using SATE Release 8.0 as the framework for its testing.

After evaluating Qwest's SATE using Release 8.0 HP issued its draft report on December 21, 2001 which found the system to be adequate to meet the needs of CLECs in Arizona. HP in their report recommended that SATE be tested for a full IMA release update (8.0 to 9.0). A series of subsequent discussions between HP and interested parties identified several dimensions of Qwest's SATE that were not evaluated because they were not available to the consultants during the test period. These included, in addition to testing a full release, the opportunity to evaluate the performance of VICKI and the addition of flow-through testing.

The ACC concurred with HP's recommendation that a test of Qwest's implementation of a full SATE-IMA release would be beneficial to all of the parties. Accordingly, HP was directed to review the implementation processes used by Qwest to introduce SATE 9.0 then scheduled for introduction in late February 2002. The CLECs, however, objected to the scope of HP's review as too narrow and sought incorporation of VICKI testing and flow-through into the evaluation. In the February 22, 2002 TAG Meeting, Qwest opposed broadening the scope of HP's evaluation and suggested the parties were at impasse.

C. Position of the CLECs

1. Testing of VICKI

AT&T and WCOM jointly maintain that the initial SATE implementation relied on manual processing of all post order processes, involving Qwest personnel and restricting CLECs to ten transactions per day. In support of this claim, the parties cite to a Qwest report that states:

> Although Order and Pre-Order testing was simplified with SATE's launch, post order processing continues to require coordination with Qwest personnel. In SATE today, CLECs contact the EDI Implementation Team to request certain post-order transactions be sent. The EDI Implementation Team then manually initiates these transactions for EDI transmission, as they would be sent to a CLEC in production. For example, a CLEC tester may want to test to see that a POTS Resale LSR for an Activity of N can be properly processed to completion by that CLEC's software. In this case, a testing CLEC would contact Qwest and request that an FOC and Completion for that LSR be sent. Qwest would then manually trigger these responses.[1]

AT&T and WCOM argue that Qwest recognized this limitation to be one of several reasons why SATE did not mirror the production environment. As further evidence, AT&T and WCOM suggest that KPMG (in its evaluation of SATE for the Regional Oversight Committee ["ROC"]) support this opinion saying:

> SATE does not offer true end-to-end testing capabilities through to Qwest's provisioning and billing systems. Currently, SATE does not generate post-order responses in the same manner as they are created in the production environment. Specifically, a Test System Engineer (TSE) manually provides responses to the CLEC that would be system-generated in the production environment (e.g. firm order completion notices, and other post-order responses such as rejections). Manual response generation is not representative of the production environment, and does not provide adequate assurance that CLECs will see similar transaction behavior once in production. Additionally, manual intervention increases the risk of human error.[2]

AT&T and WorldCom argue that -- in the months since the original SATE evaluation was performed by HP -- Qwest has implemented a new feature in SATE termed VICKI ("Virtual Interconnect Center Knowledge Initiator") that remedies part of

[1] Qwest VICKI White Paper, Version 1.0, December 7, 2001, page 3.
[2] KPMG ROC Test Exception 3077 (RMI) SATE Issues, page 1.

the problems outlined above. AT&T and WorldCom again refer to Qwest's White Paper suggesting the following:

> VICKI was created to respond to requirements for further automation and decreased dependence on Qwest personnel for post-order processing. The objective of the VICKI project is to improve a CLECs ability to test post-order transaction processing in a stand-alone manner.[3]

In the opinion of AT&T and WorldCom, VICKI is a new, extensive module that -- given its convenience over the current manual processes -- will be used extensively by CLECs in the SATE. According to the parties, HP is using VICKI in its testing of SATE 9.0 to speed testing but is not doing a comprehensive test of VICKI. Again, the parties cite to HP's work plan:

> HP will not be evaluating the use of VICKI for responses. HP will utilize a small capability of VICKI for the purpose of expediting this transaction testing. There will be no comprehensive evaluation of VICKI conducted by HP nor will there be a statement of adequacy made regarding the use of VICKI.[4]

AT&T and WorldCom consider VICKI to be important to them and consider it essential that HP be tasked with a comprehensive evaluation of the VICKI capabilities. The parties assert that such an evaluation must be conducted before the Arizona Commission can conclude that Qwest has met its obligations for providing a "test bed" that mirrors the production environment. The parties contend that at the very least, such an evaluation should determine the adequacy, reliability and accuracy of electronic post order transactions.

1. Testing Flow-Through

In addition to the arguments made above for testing VICKI, AT&T and WorldCom argue that VICKI does not provide a CLEC the means to fully determine if specific orders will flow though in the production environment even though VICKI provides some level of post order automated processing. Here, AT&T and WorldCom refer to Qwest's own documentation of VICKI as evidence supporting their opinion:

> VICKI allows CLECs to enter an LSR and receive the post-order transactions they want to test. It does not, however, answer what would happen to that LSR in production. Specifically, VICKI will cause IMA to send an FOC with Flow Through like response time when asked by a CLEC to do so, but it will not let a CLEC see

[3] Id., page 4.
[4] SATE New Release Testing 9.0 Transaction Test for IMA EDI SATE Evaluation, January 29, 2002, page 37.

> whether that specific LSR would receive a Flow Through FOC in production.[5]

Additionally, AT&T and WorldCom argue that Qwest admits CLECs need to have the ability to test whether specific order types will flow through in the production environment: Again, AT&T and WorldCom draw upon Qwest published materials for the basis of their argument:

> Production-like Flow Through systems are needed for a CLEC to test whether a given LSR would Flow Through if sent to production.[6]

Furthermore, AT&T and WorldCom argue that testing by the KPMG for the ROC demonstrated that flow through capability was important to CLECs and is missing in Qwest's initial SATE implementation:

> Flow-through orders are not supported in SATE, even though these types of orders will be processed in the production environment. Therefore, CLECs are unable to truly test the ability of orders to flow-through (no manual intervention) the IMA systems in production. CLECs will only have limited ability to evaluate the behavior of the system in a manner that is consistent with flow-through orders in production. A test environment should mirror the production environment, and provide evidence of what is to be expected when entering production, including flow-through behavior.[7]

AT&T and WorldCom point to the fact that the Flow-Through module is scheduled to be available in on February 25, 2002 in conjunction with the first of a two-part planned implementation of Qwest's SATE 9.05:

> This objective is being completed in two phases. On February 25, 2002, SATE will support Flow Through Testing for POTS Resale and UNE-P POTS IMA 9.0 LSRs in the Western Region. SATE will support Flow Through Testing for all SATE supported IMA 9.0 functions in all regions by the end of the second quarter of 2002. This document addresses SATE in both phases of this project.[8]

AT&T and WorldCom expressed the opinion that the new module adds important features and will be extremely useful to CLECs using SATE. AT&T and WorldCom

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[5] A White Paper on Flow Through in The Stand Alone Test Environment (SATE), January 3, 2002, Version 1.0, page 3.
[6] Id.
[7] ROC Exception 3077, page 2.
[8] Flow Through White Paper, page 3.

express concern that there is no provision for HP to test the Flow-Through module of SATE in the currently approved review of SATE 9.0. Accordingly, AT&T and WorldCom argue that CLECs using the Flow Through module have no assurance that SATE will provide them accurate results. Both parties express concern that using software that has not been thoroughly tested is risky; the high error rates that Hewlett-Packard has experienced in each of Qwest's initial SATE software releases indicate that Qwest is not doing a thorough job of testing its software. AT&T and WorldCom maintain that third- party testing is essential to assure SATE's Flow Through module will be a good mirror of the production environment; and will serve as a reliable indicator of orders that flow through into Qwest's service order processor without manual intervention.

C. Qwest's Position

Qwest argues that HP's SATE Draft Evaluation Report recommended additional testing of SATE 9.0 to ensure it is 'adequate for full release testing'[9]. Nonetheless, AT&T insists that HP should expand its' proposed scope to evaluate additional SATE functionality that has become available since HP conducted its initial review. Qwest states that AT&T and WorldCom have proposed additional activity that is beyond that required by HP to determine if SATE 9.0 is adequate for full release testing. Qwest maintains this issue should be decided in its' favor because a broader test scope is unnecessary.

In support of its conclusion that broader testing is unnecessary, Qwest cites to HP's conclusion it found Qwest's SATE to be "adequate to support Qwest CLEC testing in the State of Arizona, given current levels of CLEC usage".[10] Furthermore, Qwest notes that following its initial review HP's proposed a set of recommendations designed to ensure SATE would remain adequate in the future. Specifically, HP's recommendation #7 reads provides that:

> "To ensure that the SATE is adequate for full release testing, HP recommends that 9.0 be tested. This release is expected to take place February 2002."[11]

1. Testing VICKI and Flow-Through

Qwest argues that AT&T's proposal to include VICKI and flow-through in the scope of HP's SATE 9.0 evaluation unnecessarily increases the testing scope. In the opinion of Qwest, AT&T has not asserted any basis for demanding that additional SATE testing be conducted for new functionality. In Qwest's opinion AT&T simply disagrees with HP's overall finding that the SATE is adequate for CLEC testing, and proposes even

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[9] Hewlett-Packard's SATE Summary Evaluation Report, Version 3.0, Section 2.2.

[10] Hewlett-Packard's SATE Summary Evaluation Report, Version 3.0, Section 2.1.

[11] Hewlett-Packard's SATE Summary Evaluation Report, Version 3.0, Section 2.2.

more testing. Qwest maintains that additional testing is unnecessary, especially given the fact that HP's draft scope already exceeds what is required by HP's recommendation to test implementation of SATE 9.0.

Qwest notes that SATE -- like Qwest's IMA -- will continue to change and be improved as enhancements are made to IMA and requests are made by the CLEC community for change. Qwest asserts that it is not reasonable to test all improvements; that such an approach would make testing a never-ending process. Qwest reiterates its conclusion that such an approach is unnecessary because the SATE has already been found by HP to be adequate.

Qwest maintains that the continued adequacy of SATE can -- and will -- be assured by controls already put in place by Qwest. First, new releases of SATE will be formally evaluated by Qwest using the guidelines published in the agreed-upon PID as the basis for its review. Qwest notes that each month -- without regard for whether a new SATE release is introduced -- PO-19 is calculated by Qwest and the result is made public coincident with other Qwest PIDs. Qwest notes that although the proposed benchmark for PO-19 is at impasse in Arizona, the ROC has set its benchmark for PO-19 at the 95% level.

Second, the monthly Change Management Process (CMP) meetings conducted by Qwest with CLECs provide an opportunity for CLECs to communicate issues, concerns, and questions concerning SATE to Qwest for resolution. Finally, proposed SATE Change Requests (CR) have been fully integrated into the CMP review and prioritization process along with proposed changes.

Qwest argues that HP – in its initial examination -- found SATE to be adequate for CLECs' use in Arizona. Consequently, Qwest argues that the scope of HP's SATE 9.0 testing is above and beyond what is required to ensure full release testing is adequately supported. Qwest notes that AT&T does not agree with their opinion and insists that Qwest be required to have additional SATE functionality testing performed. This request, in the opinion of Qwest, is unwarranted because HP has already made its determination that SATE is adequate -- and is now in the process of further testing to evaluate new release testing adequacy. Qwest asks that Staff rely on HP's professional judgment when they concluded the SATE to be adequate. Qwest asks Staff to limit HP's SATE 9.0 testing to its reasonable purpose – to determine if SATE is adequate for full release testing.

D. Staff Resolution

With this impasse, Staff has been presented with two independent – but related – issues to resolve. In endeavoring to resolve the issues Staff has considered: a) the Impasse Position Statements submitted by each party, b) the HP Draft Evaluation Report issued December 21, 2001, c) Comments to the December 21, 2001 HP Report submitted by the parties, and, d) evidence and comment presented in Workshops #7 and #8.

The Staff has reviewed all of the argument -- and evidence – offered by the parties and shares the concerns presented by each in their position statements. It is important to note in starting out that this is the first time that a SATE has been subject to an independent third party evaluation. HP was engaged to evaluate Qwest's SATE and to report back to the ACC as to its adequacy. HP was instructed by the ACC to design a test which it believed to be adequate to determine whether the Qwest testing environment met 1) the diverse needs of the CLECs, 2) the requirements specified in prior FCC 271 Orders, and 3) considered the functionalities contained in other RBOC stand-alone test environments around the country. In its December 21, 2001 Draft Report on SATE, HP concluded that SATE was adequate to meet the current needs of the CLECs. However, HP discussed with the Staff a concern that Qwest's SATE included a significant degree of manual response generation, which Qwest subsequently addressed through VICKI.[12] As a safeguard, given the degree of manual response generation at the time, HP's Recommendation No. 3 was meant to ensure that staffing levels (and hence SATE) would remain adequate in the interim.

HP's evaluation of Qwest's SATE was done at a point in time when VICKI and Flow-through had not yet been implemented. Therefore, it was not possible to test them at that time. Since the original SATE evaluation was performed by HP, as noted by both WorldCom and AT&T, Qwest has implemented a new feature in SATE termed VICKI (Virtual Interconnect Center Knowledge Initiator) that remedies part of these problems. Hence, the current impasse which requests a comprehensive test of both features.

Staff believes that VICKI and Flow-Through are critical pieces of any SATE environment, in order for that environment to be truly representative of the production environment. However, the real crux of this matter is that in an engagement of this nature, it is simply not possible, given the costs involved, to postpone an evaluation until new releases become available or to test every new release that is implemented. What is important is that at the time of its evaluation, HP found that the SATE was adequate to meet the current CLEC needs, but in discussions with the Staff indicated that Qwest SATE relied heavily on manual processing which should be reduced in the future. Qwest responded in Release 9.0 with the implementation of VICKI and Flow-Through. In sum, HP's primary evaluation was based upon 8.0 and done at a point in time when VICKI and Flow-through were not available. While HP was asked to follow up on its recommendation to test SATE 9.0, to ensure that a partial and full releases were handled in the same manner, that test included the use of VICKI, but not a comprehensive test as the CLECs would have liked. Staff believes that while a comprehensive test of VICKI would give added assurances to the Staff and CLECs, it was not required, nor is it now necessary. Given the nature of these engagements, what was required was done at the

[12] Staff agrees with the concerns of KPMG in Exception 3077 which read in part: SATE does not offer true end-to-end testing capabilities through to Qwest's provisioning and billing systems. Currently, SATE does not generate post-order responses in the same manner as they are created in the production environment. Specifically, a Test System Engineer (TSE) manually provides responses to the CLEC that would be system-generated in the production environment (e.g. firm order completion notices, and other post-order responses such as rejections). Manual response generation is not representative of the production environment, and does not provide adequate assurance that CLECs will see similar transaction behavior once in production. Additionally, manual intervention increases the risk of human error.

time of the HP's primary evaluation of SATE. It is not necessary because there is now a PID to measure Qwest's performance in the future, which should ensure that the SATE mirrors production.

We expect that Qwest's SATE will continue to change in the future, with new enhancements being added all the time, and will present a continuously evolving test environment to CLECs. Qwest's commitment to emulate the dynamic production environment in its SATE will dictate constant changes to SATE. The Change Management Process will also result in more CLEC proposed changes to the production (and SATE) environments, also acting to increase the number and frequency of new SATE releases in the future.

What is important, is that the future performance of SATE will be evaluated by the PO-19 measurement. The results of this measurement will provide CLECs the evidence they need if SATE does not perform adequately for CLEC testing requirements. Staff is not convinced that PO-19 in its current form will accomplish this, however. Consequently, Staff will further examine these concerns and attempt to resolve them in the context of Master Issue No. 943 dealing with the impasse over production likeness testing.

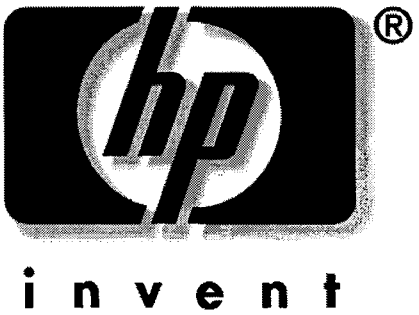
Reply Exhibit LN-46

SATE New Release Test Summary Report

9.0 Transaction Test

For Qwest IMA EDI SATE

Arizona Corporation Commission



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SATE New Release Test Summary Report (9.0)

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0.1	02/14/02	Sunil Saigal	First internal Draft
1.0	03/27/02	SATE Team	First External Draft Release
2.0	03/29/02	SATE Project Team	Final Release
2.1	03/29/02	SATE Team	Internal Draft for Supplemental
3.0	04/26/02	SATE Team	Update to Final Release including: ○ Correction of miscellaneous typographic errors not affecting content ○ Page 23 – Clarification of formula definition under *% Retest Successful* ○ Page 23 – Table 5 – *Total Results* under *% Successful* corrected to 92.30. ○ Page 24-25 – Tables 6 and 7 – Updates to issue *Status* ○ Page 27 – Table 8 – Corrected Totals for *Pre-Order Responses* and *Behavioral Data Edits.* Also updated the grand total under these columns. **Note:** No edits to version 3.0 affect the appendices to the document.

Proprietary Notice

The information contained in this SATE New Release Testing Summary Report constitutes a trade secret and/or information that are commercial or financial and confidential or privileged, prior to the Report's release by the Arizona Corporation Commission. This restriction does not limit the right to use or disclose this information if obtained from another source without restriction. Hewlett-Packard makes no warranties, guarantees or commitments to any party with regard to the information disclosed herein.

Table Of Contents

1.0 Overview

1.1 Background

As an extension to the Arizona 271 testing effort, Qwest commissioned HP to evaluate its IMA EDI Stand Alone Test Environment (SATE). HP's primary objective was to provide the Arizona Corporation Commission (ACC), Qwest and the CLEC community with an evaluation of SATE that is unbiased, factual and representative of the experience that a CLEC would face in using SATE for Interoperability testing to establish an IMA EDI interface with Qwest. In addition, HP's objective was to determine whether the SATE provides an adequate means of testing and support to CLECs seeking to compete in the Arizona marketplace.

HP completed this assessment of the adequacy of Qwest's IMA EDI SATE to facilitate the efforts of Co-Providers to test their OSS EDI interfaces. This evaluation was concluded and the Final version of the Evaluation Report was delivered on December 21, 2001. This report included HP's assessment of "adequacy" based on reviewing and testing eight underpinnings of SATE upon which the CLECs are reliant. One of those eight underpinnings was the accommodation of New Release Testing within the SATE. The Adequacy criteria was documented as follows:

> *"Accommodation of New Release testing: HP will evaluate Qwest's documentation and observe Qwest's compliance to their stated expectation to provide Co-Providers with an updated SATE at least one month prior to the corresponding production release of IMA."*

HP conducted this evaluation and concluded that the evaluation of the implementation of the SATE Release 8.1 did not provide an indication of the results of an implementation of a typical major release of IMA EDI. The implementation of the point release did not allow HP to consider all characteristics of a SATE implementation as it comes available one month in advance of a production implementation of a new IMA EDI release.

Upon the conclusion of the January 28, 2002 workshop covering HP's SATE Summary Evaluation Report, Version 3, Release Date 12/21/2001 (Summary Report), the ACC Staff, and its consultant, DCI, directed HP to conduct an evaluation of a new SATE Release, using Version 9.0 of Qwest's IMA Release as the test object. This body of work was in line with Recommendation 7 of the Summary Report, and also driven by comments provided by CLECs during the workshop. In determining the scope and approach for this evaluation of a new release, HP relied on the PID PO-19 (Draft Version October 5, 2001) as a guide and evaluation criteria.

In accomplishing its objective and developing this report, HP performed the following general steps:

- Developed a Release 9.0 Documentation distribution timeline
- Performed an assessment of the changes to IMA EDI for 9.0 as it compares to 8.1
- Developed a Question Log that details any HP questions / concerns
- Developed and Implemented HP EDI mapping and LSR Order Entry changes
- Established a Transaction Test Scenario Summary
- Established Connectivity with a new Trading Partner Relationship specifically for New Release Testing
- Executed the Transaction Test cases
- Documented Test Case Outcomes
- Provided rate of accuracy when actual outcomes are compared to the expected results
- Provided an overall evaluation of SATE New Release Testing for 9.0

Hewlett-Packard (HP), as part of its scope of responsibility to evaluate the Qwest IMA SATE, provided Preliminary and Final Summary Evaluation Report detailing its findings with respect to the adequacy of the current IMA EDI SATE.

Per HP's Summary Evaluation Report, released on 12/21/01, HP submitted its findings related to criteria that would establish the level of SATE adequacy. These criteria included Process, Documentation, Accuracy and Consistency of Test Responses, Use of CLEC Input, Mirroring the Production Environment, Accommodation of New Release Testing, and the overall CLEC Acceptance and Meeting CLEC Needs.

1.2 Purpose of the Document

The purpose of the SATE New Release Test Summary Report is to provide a description of the processes that HP used in conducting the SATE New Release evaluation, and to communicate the findings and recommendations to the ACC, Qwest, and the CLEC community.

1.3 Scope

The scope of this document is to report the results that HP discovered during the course of this evaluation. These results are from the findings that were uncovered as a result of executing the SATE New Release Test Approach (9.0).

The scope of this document includes the New Release Testing transaction-testing details that support the SATE Additional Services proposal. It covers the EDI Pre-Order, Order and Post-Order functions that are required to test the most current release of the SATE Data Document and the IMA EDI Disclosure Document for IMA EDI Release 9.0. This document does not define the approach for, or attempt to evaluate any of the processes or documentation that are specific to SATE as provided by Qwest.

1.4 Audience

This document is intended for use by the ACC, Qwest, CLEC members of the TAG and other interested third parties to understand HP's evaluation of Qwest's SATE for New Release Testing.

1.5 Document Structure

The structure of this document is based in part on the Institute of Electrical and Electronics Engineers (IEEE) Standard for Software Test Documentation (IEEE std 829-1983) ©1983.

The following table shows the different sections of this document and the information contained within that section. In addition it will serve as a guide to reading this document.

Table 1 – Document Structure

Section	Title	Description
1.0	**Overview**	General background information, and general information concerning this report.
2.0	**Executive Summary**	Contains the Executive Summary.
3.0	**Transaction Testing Evaluation**	Contains the results from the execution of the SATE New Release Test Approach 9.0 Transaction Test, and overall assessment of the SATE in meeting testing needs for CLECs in Arizona for New IMA EDI Releases.
4.0	**Issues**	Contains a description of the Issues Management process used, and the results of logging issues for this New Release Testing evaluation.

Section	Title	Description
Appendix A	Issues Tracking Log	List of issues that have been formally presented to Qwest and the community in compliance with the formal issues management process.
Appendix B	Issues Summary	Table of Issues by New Release Testing Phase Each issue is categorised by type of issue along with the issue status at the time this report is delivered.
Appendix C	New Release Transaction Test Results Reporting Summary	Results from the New Release Transaction Test.
Appendix D	Phase I - SATE 9.0 HP9 Transaction Scenario Summary – Regression Testing	This is an EXCEL spreadsheet that includes a row for each LSR that was processed through the SATE during the Regression Test. Each row tracks the date sent and the response date received. Additionally if an error occurred the error date is indicated. The HP EDI team updated this spreadsheet as the EDI LSR's were sent and the EDI responses were received on HP's Test Harness.
Appendix E	Phase I - SATE 9.0 HP9 Transaction Scenario Summary – Progression Testing	This is an EXCEL spreadsheet that includes a row for each LSR that was processed through the SATE during the Progression Test. Each row tracks the date sent and the response date received. Additionally if an error occurred the error date is indicated. The HP EDI team updated this spreadsheet as the EDI LSR's were sent and the EDI responses were received on HP's Test Harness.
Appendix F	Phase I - SATE 9.0 HP9 Scenario Testing Comments – Regression	This is an EXCEL spreadsheet that includes a row for each Regression Test Scenario. This document records an entry for each activity that occurred as the transaction was processed in the Interoperability environment. The conversation and explanations received from Qwest are noted in this log. Each scenario is assigned the appropriate status as follows: • Blank=Not executed • 1=Scenario Completed • 2=Scenario in Process • 3=HP Researching • 4=Qwest Researching

Section	Title	Description
Appendix G	Phase I - SATE 9.0 HP9 Scenario Testing Comments – Progression	This is an EXCEL spreadsheet that includes a row for each Progression Test Scenario. This document records an entry for each activity that occurred as the transaction was processed in the Interoperability environment. The Conversation and explanations received from Qwest are noted in this log. Each scenario is assigned the appropriate status as follows: • Blank=Not executed • 1=Scenario Completed • 2=Scenario in Process • 3=HP Researching • 4=Qwest Researching
Appendix H	The SATE New Release Testing Open Question Log	Questions that are the result of documentation and process reviews as well as anything that came about during the execution of the transaction test itself. This Question Log was maintained each week with updates made according to input provided by both Qwest and HP.
Appendix I	The SATE New Release Testing Closed Question Log	Question that were resolved by Qwest and HP over the elapsed time of the New Release Testing.
Appendix J	SATE Negotiated Project Schedule for Progression Testing	As part of the Qwest established process a project schedule is negotiated with the co-provider. This appendix is the HP/Qwest Negotiated Project Schedule for the initial New Release SATE Transaction Test - Phase I
Appendix K	SATE 9.0 Regression Testing Usage Plan	HP's projection for SATE usage in the Regression Testing mode.
Appendix L	SATE 9.0 Trading Partner Relationship worksheet	HP' s updated Trading Partner worksheet required specifying IMA EDI Release 9.0 EDI envelope set up.
Appendix M	Phase II - Business Rules Testing Scenario Summary	This is an Excel spreadsheet that lists the scenarios utilized to test for business rule changes and/or additions for Release 9.0 as the business rule changes are documented in Appendix F, Appendix E and the Disclosure Documentation.
Appendix N	Business Rules Testing Working Papers: Part 1 - Appendix F of IMA Disclosure Documentation Part 2 - Appendix E of IMA Disclosure Documentation	This is HP' s working paper used to determine what changes made to business rules for IMA EDI 9.0 apply to the SATE. This analysis document was used to prepare the business rules testing scenarios.
Appendix O	Phase II - Business Rules Testing	This is an Excel spreadsheet that includes a row for each Progression Test Scenario. This

Section	Title	Description
	Progression Testing Comments Log	document records an entry for each activity that occurred as the transaction was processed in the Interoperability environment. Conversation and explanations received from Qwest are noted in this log. Each scenario is assigned the appropriate status as follows: • Blank=Not executed • 1=Scenario Completed • 2=Scenario in Process • 3=HP Researching • 4=Qwest Researching
Appendix P	Phase II - Business Rules Testing Regression Testing Comments Log	This is an Excel spreadsheet that includes a row for each Regression Test Scenario. This document records an entry for each activity that occurred as the transaction was processed in the Interoperability environment. Conversation/ explanations received from Qwest are noted in this log. Each scenario is assigned the appropriate status as follows: • Blank=Not executed • 1=Scenario Completed • 2=Scenario in Process • 3=HP Researching • 4=Qwest Researching
Appendix Q	Phase III Expected Results Verification for Stability and Regression Testing Scenario Summary and Comments Logs. This Appendix will include 4 documents: • Part 1 Regression Scenario Summary, • Part 2 Progression Scenario Summary, • Part 3 Regression Comments and • Part 4 Progression Comments.	These spreadsheets are formatted identical to those of Phase I for scenario summary and comments log activity. Phase III was conducted as a Stability test and full regression of Phase I to determine the level of change in the environment between the beginning and end of the New Release testing period.
Appendix R	SATE 9.0 Errors Lists	These are the Business Process Layer Errors Lists published for the new IMA Release 9.0 that were used to build the Phase II business rules test and provide validation of those test results.
Appendix S	SATE 9.0 IMA EDI Disclosure Publications	This is a link to the IMA EDI Release 9.0 Disclosure documentation that HP used to determine EDI mapping changes and Business rules edit changes required for New Release Testing.

Section	Title	Description
		http://www.qwest.com/disclosures/netdisclosure409.html.
Appendix T	SATE 9.0 Production Mirror Impasse Response	This is HP's response to the Production Mirror Impasse issue.
Appendix U	SATE 9.0 Scenarios that utilized VICKI Paths	This is a spreadsheet that details the Phase I and Phase III scenarios that were executed using VICKI response paths.
Appendix V	SATE 9.0 Functionality Tested	Products and activities tested in SATE New Release Test for SATE 9.0 IMA EDI Release
Appendix W	Release 9.0 Documentation distribution timeline	This is the history of all documents released to the community for 9.0 during the life of the SATE New Release Test. These documents were utilized as part of this testing.
Appendix X	PO-19 SATE New PID 03Oct01 - Final Draft	Performance measurement document used as the basis for establishing the benchmark for this test.
Appendix Y	SATE Data	SATE Data
Appendix Z	Data Request	Data Request made by HP for Qwest's CLEC usage.

1.6 References

The following documents are referenced as part of this New Release Testing, 9.0 Transaction Test Summary Report:

Table 2 – References

Document	Release Date	Version
HP's Draft Proposal to the ACC for SATE Testing - Additional Services	February 13, 2002	
Qwest IMA EDI Implementation Guidelines	January 21, 2002	9.0
Qwest IMA EDI 9.0 Data Document for SATE	January 28, 2002	2
Qwest IMA EDI 9.0 Data Document for SATE	January 29, 2002	3
Qwest IMA EDI 9.0 Data Document for SATE	February 4, 2002	4
Qwest IMA EDI 9.0 Data Document for SATE	February 20, 2002	4a
Qwest IMA EDI 9.0 Developer Worksheets	January 21, 2002	
Qwest IMA EDI 9.0 Network Disclosure Documentation	January 21, 2002	
Qwest IMA EDI 9.0 Error List - BPL Errors	January 30, 2002	2
Qwest IMA EDI 9.0 Error List - Legacy System Errors	February 4, 2002	2
Qwest IMA EDI 9.0 Error List - BPL Errors	February 25, 2002	3
Production Mirror Impasse Statement	March 14, 2002	
PO-19 SATE New PID 03Oct01Final Draft	October 03 2001	Final Draft
IMA–EDI Stand Alone Test Environment White Paper	May 25, 2001	1.0

2.0 Executive Summary

As explained in the background (Section 1.1), HP issued its Summary Evaluation Report on December 21, 2001. In section 2.1.6 of that document, HP reported the following finding for the SATE accommodation of new release testing for the implementation of new IMA EDI releases:

"HP evaluated the SATE's adequacy for new release testing by evaluating pre-release testing for IMA 8.01. Qwest's process for SATE new release testing appeared to be an exception to Qwest's normal point release implementation. Point releases normally do not affect the EDI or BPL layer, however, release 8.01 did provide the implementation of new BPL edits. This evaluation is ***inconclusive*** *because HP was not able to fully verify that the SATE is adequate for* ***new release testing.****"*

HP included in its Summary Evaluation Report the following recommendation that was aimed at ensuring that the SATE adequately supports CLEC new release testing.

"Recommendation 7 - To ensure that the SATE is adequate for full release testing, HP recommends that IMA SATE release 9.0 be tested. This release is expected to take place February 2002."

Upon the conclusion of the January 28, 2002 workshop covering HP's SATE Summary Evaluation Report, Version 3, Release Date 12/21/2001 (Summary Report), the ACC Staff, and its consultant, DCI, directed HP to conduct an evaluation of a new SATE Release, using Version 9.0 of Qwest's IMA Release as the test object. This body of work was in line with Recommendation 7 of the Summary Report, and also driven by comments provided by CLECs during the workshop.

In response to the ACC directive, HP developed a test plan that relied on the PID PO-19 (Draft Version October 5, 2001) as a guide and evaluation criteria. Based upon its initial evaluation of PO-19, HP divided the Sate New Release Test into 4 Phases:

- Phase I - Expected Results Verification
- Phase II - Business Rules Testing
- Phase III - Expected Results Verification for Stability and Regression Testing
- Phase IV - Production mirror Testing

The wording in the PID, as agreed to by the community, specifically defines the scope used to measure the level of accuracy, expected of a New Release test of SATE as follows: *'Includes one test transaction for each scenario published in the IMA EDI Data Document – for the Stand Alone Test Environment (SATE)'*.

HP performed this test in **Phase I** of the HP New Release Test of SATE 9.0. Phase I provides the information necessary to meet the requirements of the PID formula calculation which results in the percentage unit of measure. This percentage is compared to the benchmark established by HP for the purpose of this evaluation as a level of accuracy. Refer to Section 3.3.4 on page 17 for the benchmark rationale.

HP performed **Phase II** - Business Rules testing - per the interpretation of the PID language that suggests there be strict adherence to business rules published in the most current IMA EDI Disclosure Documentation for each release and the associated Addenda. Although no benchmark has been established in PID PO-19 for this measurement, HP believes that that this measure is important in establishing the level of accuracy in business rule implementation of SATE for new releases as indicated in the PID language "*strict adherence to business rules*". Refer to Section 3.3.4 on page 17 for the benchmark rationale.

Phase III - Expected Results Verification of Stability and Regression Testing - of the HP New Release Test of SATE 9.0 was a re-test of Phase I and was performed to show stability in the environment during the month that SATE was available to the community prior to the new IMA Release being introduced into production. Although no benchmark has been established in PID PO-19 for this measurement, HP believes that that this measure is important in establishing the stability and

accuracy of SATE for new releases to fulfill the spirit of this PID as stated in its purpose "*Evaluates Qwest's ability to provide accurate production-like tests to CLECs*". Refer to Section 3.3.4 on page 17 for the benchmark rationale.

Phase IV - Production Mirror Testing - was originally included in the scope of the HP New Release Test Approach, based upon HP's initial understanding of PO-19. However, further analysis of the definition and record associated with PO-19 caused HP to determine that the PID is not intended to assess production likeness and, in fact, the PID did not support Production Mirror Testing. Therefore, HP did not perform this test. (Please refer to Section 3.6.2 for a more detailed discussion).

2.1 Findings

HP has completed the New Release Test of the most current IMA EDI implementation that was brought to SATE on January 28, 2002. HP has determined that the Qwest SATE is adequate to support New Release Testing by a CLEC. HP's conclusion is based upon the following results:

- The SATE provides the CLEC with data and functionality to test its interface for all products being used by CLECs on Qwest's IMA EDI environment. The data provided in the available scenarios represent transactions that would result in a successfully completed LSR in production, as specified in the IMA EDI Disclosure Document.
- The SATE provides the CLEC with the ability to test its interface up to 30 days in advance of the production release of the corresponding Qwest IMA EDI Release.
- Although the SATE processes and documentation continue to be enhanced through Qwest's internal process and input from the CLECs in the SATE User Group, the Qwest EDI Implementation team continues to provide the support required to aid a CLEC in developing it's interface to a new IMA EDI Release.
- CLECs appear to be successful in using SATE and many CLECs appear to be migrating to using the SATE rather than Qwest's Interoperability environment as indicated by the Data Request Returned by Qwest on March 27, 2002. See Appendix Z for this Data Request.

HP employed a phased approach to this testing as documented in the HP SATE New Release Testing Approach document (9.0).

Each Phase of this test was developed per HP's interpretation of the PID PO-19 SATE measurement. The PID-PO19 served as a guide to the level of testing that was conducted to ensure an objective and impartial result was achieved.

- Phase I testing focused on the verification of the expected results for all scenarios made available within the SATE Data Document approximately 30 days in advance of a new IMA EDI release being deployed into production.
- Phase II testing focused on the validation of business rules changes that came about with the new IMA EDI 9.0 release.
- Phase III testing focused on the validation of consistency in results for all scenarios available within the SATE Data Document over the 30-day testing period for a new release.

PHASE I

The Phase I testing outcome produced a 93% level of accuracy in expected results. While this result does not meet the PO-19 benchmark of 95% the margin of shortfall is small. In addition, HP has observed a clear trend across release 7, 8 and 9.0 testing is showing that Qwest should achieve the 95% accuracy rate with the next implementation of IMA EDI changes into SATE.

Therefore, HP concludes that overall for Phase I test result is Adequate, as no re-test necessary.

PHASE II

HP conducted this phase of testing to determine if the new business rules that were documented in the IMA EDI Disclosure Document for Release 9.0 in Appendix E and Appendix F were made available in the SATE approximately 30 days in advance of those new or updated business rules were rolled into the production IMA EDI environment. In conducting this analysis, HP categorized unexpected responses into two categories – those measured by PO-19, and those that are not measured by PO-19.

Phase II performance, as measured by PO-19, indicates that 97% (96.6) of transactions yielded expected results in terms of EDI Mapping, Data Attributes, and Workflow. HP believes that this level of performance is adequate to support CLEC new release testing.

Table 3 – Results Summary

Category		Total	Fail	% Success
EDI Mapping		122	2	98%
Data Attributes		122	2	98%
Workflow		122	9	93%
Environment Constraints	N/A			

PHASE III

HP conducted this phase of testing to assist in verifying the stability in the SATE for the period of time that would allow a CLEC to prepare for the new release production implementation. HP was looking for consistency in the outcomes of each scenario available in the SATE while comparing the test results for each scenario from PHASE I to the outcome of the same scenario when executed in Phase III. Phase I took place approximately 28 days prior to the production availability of the new release; and Phase III took place just 5 days before production implementation of this 9.0 release. This comparison of Phase I to Phase III outcomes provides the understanding of how reliable the testing environment is approximately 30 days in advance of the production deployment.

Additionally, Phase III allowed HP to evaluate the results as a full regression test to ensure that any Data Document changes, made by Qwest as corrective actions based on Phase I results, were implemented successfully with no impact to the overall outcome of all scenarios available in the SATE.

HP has observed a positive result when evaluating the stability and the consistency of results for the period of approximately 30 days. The Phase III testing found a 95% accuracy rate overall which meets the diagnostic benchmark established by HP for the purpose of evaluating this phase of the new release test.

During this engagement, HP identified issues associated with documentation, test account data, EDI mapping and business rules implementation. HP followed the Formal Issues Management process and documented these issues accordingly. Qwest has initiated corrective actions for most of the issues identified to date. Additionally, HP only realized minor schedule impacts to its overall transaction evaluation as a result of the problems identified.

2.2 Recommendations

HP has developed recommendations aimed at ensuring that the SATE remains adequate for supporting new releases of the IMA EDI interface. This will ensure that Qwest provides an environment that supports certification and new release testing to serve Arizona CLEC's needs on an ongoing basis. The specific issues and recommendations are as follows:

1. All issues that have a status of "Closed-Unresolved" or "Open" as of the distribution of this document are incorporated into the SATE User Group and CMP process.
2. Supporting documentation be provided to more clearly clarify the calculations and measurement process of PID PO-19.
3. Qwest should consider asking CLECs to submit data requests for negative scenarios and BPL edits for key transactions. Qwest provide a clearly defined process to ensure timely resolution of production mirror issues encountered by CLECs during post SATE certification.
4. Qwest include scenarios in data document reflecting all business rule changes identified in the New Release change summary documentation.

3.0 Transaction Testing Evaluation

3.1 Overview

HP evaluated the ability of Qwest's IMA EDI SATE to support IMA EDI Release of V9.0 as a new release. HP relied on its understanding of the Performance Indicator Definition (PID) PO-19 to guide the criteria and approach for evaluating this release. The transaction test evaluation provided the data used to assess the adequacy of Qwest's IMA EDI SATE to facilitate CLECs in testing its EDI interfaces.

The evaluation of Qwest's SATE for a new release focuses on several aspects:

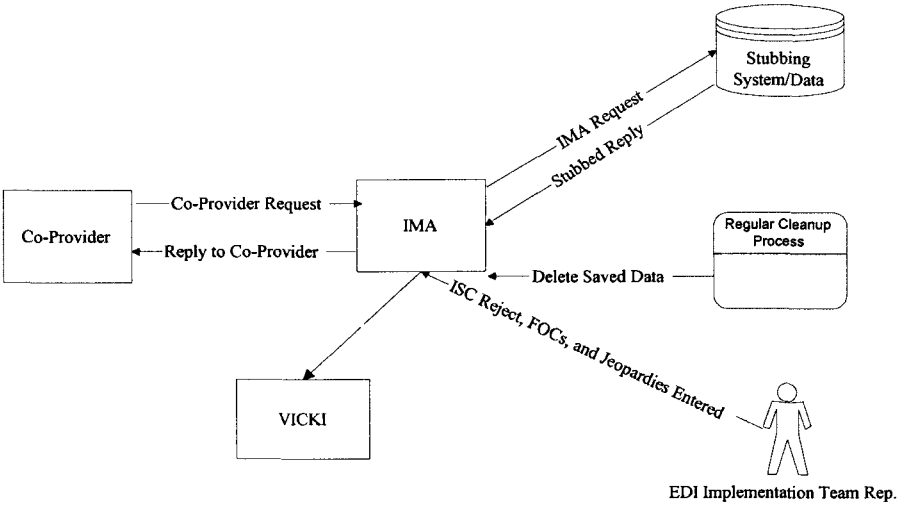
- **Availability of Test Environment** - The testing environment has to be made available to the CLECs in advance of the new release going into production on the OSS systems. Qwest has stated that this availability is made approximately 30 days in advance of the new release going into production.
- **Stability of the Testing Environment** - Does the documentation and systems remain stable from the introduction of the new release in the testing environment to the date the new IMA release becomes available in the production IMA-EDI environment.
- **Performance of New Release** - Does SATE support a New Release of IMA EDI in terms of EDI Mapping and documented Expected results, as measured by the conditions of PO-19.

3.2 Architecture

This New Release Testing approach is focused on verification of Qwest's documented EDI and business rules changes for IMA EDI Release 9.0. More precisely this transaction test focuses on only those changes as a result of the Qwest implementation of Release 9.0 that affect the available scenarios within the current SATE release 9.0 data document.

The following diagram, taken from Qwest's White Paper on "The IMA EDI Stand-Alone Test Environment", dated May 25, 2001, Version 1.0, has been modified by HP to show the interaction of VICKI in the SATE. The original diagram was presented in Qwest's SATE White Paper to describe the logical components that are part of the SATE architecture. These same components will be included in this New Release testing event.

NOTE: This approach does not include a comprehensive evaluation of the VICKI enhancement. HP has used the VICKI response technique to accelerate the transaction testing.



The following modules were tested by HP during the transaction test evaluation:

- The IMA Module (including an EDI Translator)
- Stubbing System Module

Below is a description of each module as it is documented in the Qwest White Paper[1].

IMA Module (including an EDI Translator) - This is an actual version of IMA configured to direct requests to the Stubbing System instead of the back-end systems it normally calls. It runs all the edits to determine whether the detailed fields within a transaction are valid. The only modifications made especially for this version are listed below:

- Certain edits are turned off. These edits in no way affect acceptance of a function performed by a CLEC. These edits are most often used to determine whether an LSR requires Manual Handling before service orders are sent.
- The SATE uses generic CLECs that can be used by different actual CLECs over time. The SATE version of IMA is therefore configured to hold identification information for these generic CLECs.
- Other minor changes determined during detailed design.

Stubbing System Module - IMA will be accessing this system using the same Application Programming Interfaces (APIs) that the Production version of IMA uses when calling back-end systems.

The system, in most cases, returns responses to IMA using data-driven stubs. For example, CLECs send requests to IMA to find the address associated with a given telephone number. In production, IMA sends a request to the Fetch 'n' Stuff system, which in turn sends a request to PREMIS to gather such information. In the SATE however, the request is sent from IMA to the Stubbing System. There, the request is parsed and the telephone number is looked up in a database. If the number is found, the preset response specified for that number is sent back to IMA. If it is not, a generic "No Match " response is sent to IMA.

[1] NOTE: the Qwest White Paper is no longer supported as it has been incorporated into the EDI Implementation Guidelines – for Interconnect Mediated Access (IMA) and Facility Based Directory Listings (FBDL); however this specific architecture information was not carried forward.

This basic stub process is replicated for calls to most of the stubbed back-end systems. In some cases, however, an external system is not called, but instead a database is accessed. For instance, in Production, calls to the Loop Qualification Database (one of the systems that is stubbed) are made via SQL Query. Therefore, for this case, the Stubbing System simply has a database view which matches the view called in production and the underlying tables are populated with SATE specific data.

Regular Cleanup Process - Since Co-Provider IDs can be passed from one Co-Provider to another in the SATE; the environment is flushed of all transactional data on a monthly basis. This data includes reserved appointments, telephone numbers, and the LSRs entered by Co-Providers.

VICKI (Virtual Interconnect Center Knowledge Initiator) - With VICKI, Qwest will automate transactions that are automated in production, and leave manual processes that are currently manual in production. Events will be technically created in the following manner:

- **FOCs** - VICKI then uses a Flow Through Service emulator to create an FOC based on production FOC examples for that Product, Activity, and Supp Type Combination.
- **All Status Updates and Completions** - VICKI sends CRM like messages. In the case of Completions, these are based on production Completions examples for that Product, Activity, and Supp Type Combination.
- **Second FOCs for a specific LSR, Manual Rejects, Non-Fatals, and LSR Level Jeopardies** - These are still manually created from the FOM in the exact same manner as in production.

3.3 Purpose of Evaluation Methods

Transaction tests were performed to validate that the SATE can provide CLECs with a stable environment to test new release changes as prescribed by the Arizona PO-19 SATE Performance Measurement. HP analyzed the information provided in the Qwest Release 9.0 documentation to establish an assessment of the EDI and Business Rules changes, and determine the extent of testing necessary to verify the IMA EDI 9.0 release is available within SATE. Additionally HP performed an evaluation of the accuracy of the outcomes generated by SATE per Qwest's implementation of the expected release changes in the SATE for use by the CLEC community and independent vendors for New Release Testing. This includes the competence of SATE to react to LSR's providing results that are consistent with those scenarios and their expected results as they are provided in the 9.0 Data Document.

HP conducted a three-phase test that is correlated to the SATE Performance Measurement PO-19 specifications. The three phases address language provided by PO-19. These transaction test phases are:

- **Phase I** - Expected Results Verification
- **Phase II** - Business Rules Testing
- **Phase III** - Expected Results Verification for Stability and Regression Testing

The outcome of the three phases of transaction testing provided the percentage of accuracy in transaction outcomes when compared to the Release 9.0 Data Document and the percentage of successfully implemented business rules changes identified that affect SATE scenarios.

Each testing phase is described below.

3.3.1 Phase I - Expected Results Verification

HP executed every test bed scenario that is represented in the Stand - Alone Test Environment as the PID PO-19 has guided for the SATE New Release of IMA EDI.

"Includes one test transaction for each scenario published in the IMA EDI Data Document – for the Stand Alone Test Environment (SATE)."

As documented in the PID this set of transactions were executed:

"when a full or point release of IMA is installed in SATE. These transactions will be executed within five business days of the numbered release being originally installed in SATE. This five business-day period will be referred to as the "Testing Window."

Pass / Fail Criteria
HP determined the success or failure of each of the Phase I test scenarios based on the expectations described in the PID.

"The successful execution of a transaction is determined by the Qwest Test Engineer according to:

- *The expected results of the test scenario as described in the IMA EDI Data Document – for the Stand Alone Test Environment (SATE) and the EDI disclosure document.*
- *The transactions strict adherence to business rules published in Qwest's most current IMA EDI Disclosure Documentation for each release and the associated Addenda"*

A scenario **"Passed"** the Phase I test if the actual results received were the same as the expected results documented in the most current SATE 9.0 Data Document.

A scenario **"Failed"** the Phase I test if the actual results received were different to the expected results documented in the most current SATE 9.0 Data Document.

3.3.2 Phase II - Business Rules Testing

This test evaluated those business rules that have changed in SATE due to the new IMA-EDI Release 9.0. HP derived a list of test scenarios based on Appendix F - Release 9.0 Change Summary; Appendix E updated Additional IMA edits for 9.0 to Qwest's IMA EDI 9.0 Disclosure Documentation, and the Qwest IMA-EDI 9.0 Disclosure Documentation.

These scenarios were executed in SATE to determine if the business rules documented in the most current IMA-EDI Network Disclosure documentation have been implemented successfully into the SATE test bed.

This test made use of the current IMA EDI Business Process Layer Error List and the current IMA EDI Legacy Systems error list as a comparison to the response provided for the each transaction submitted.

The following PID language was the basis of this testing phase:

"The transactions strict adherence to business rules published in Qwest's most current IMA EDI Disclosure Documentation for each release and the associated Addenda."

Pass/Fail Criteria
HP determined the success or failure of each of the Phase II test scenarios based on the expectations described in the PID.

A scenario **"Passed"** the Phase II test if the actual results received were the same as the expected results documented by HP in the Business Rules Scenario Summary Worksheet.

A scenario **"Failed"** the Phase II test if the actual results received were different from the expected results documented by HP in the Business Rules Scenario Summary Worksheet.

3.3.3 Phase III - Expected Results Verification for Stability and Regression Testing

HP executed a second transaction test to demonstrate the stability of the SATE from the point the new release is implemented in the test environment, 30 days in advance of the IMA production implementation, until the time the release is deployed to production.

This Phase of testing was executed 5 days prior to the production release was deployed. The same transactions and the same pass/fail criteria for Phase I apply to this phase of testing.

Additionally this test phase addressed those transactions that failed the Phase I testing. HP anticipated that any failures captured in the Phase I testing would be corrected by the time Phase III was executed. This Phase served as a Full Regression test, to ensure that any corrective actions taken by Qwest would not have any adverse affects to any other test scenario outcomes.

Pass/Fail Criteria
HP determined the success or failure of each of the Phase III test scenarios based on the same criterion as Phase I.

A scenario **"Passed"** the Phase III test if the actual results received were the same as the expected results documented in the most current SATE 9.0 Data Document.

A scenario **"Failed"** the Phase III test if the actual results received were different to the expected results documented in the most current SATE 9.0 Data Document.

3.3.4 Benchmark

HP established its benchmark using PID PO-19 for guidance. As of the date of this report, no consensus has been reached in Arizona on a performance benchmark. HP recommended a benchmark of 95% in December 2001, and in its SATE New Release Test Approach 9.0 Transaction Test document. HP also considered the discussions in the Regional Oversight Committee (ROC) test for Qwest. The ROC Executive Steering Committee ruled on an impasse resolution and adopted the benchmark of 95 percent for the states under the ROC jurisdiction.

3.3.4.1 Community's Perceptive on the ROC's Benchmark

January 28/2002 ROC Steering Committee Resolution

> *"By a unanimous vote of nine (9) to zero (0), with one abstention, the Steering Committee (SC) determined that the benchmark to be used for the ROC PO-19 PID should be 95% beginning in March 2002 and should be revisited within six months of that time.*
>
> *The SC considered the following key aspects in its determination:*
> - *A benchmark of 95% does not seem unreasonable based on current results*
> - *Implementation of this interim benchmark starting in March 2002 coupled with a 6-month review allows time for enhancements to the SATE platform to reach maturity and stability before a final benchmark is established*
> - *A 95% benchmark in the interim should encourage Qwest to not release future upgrades of SATE until such time as the release is performing at least to a 95% level of accuracy, thus furnishing the CLECs with reasonable assurance of a stable platform*

Voting on the issue: All states in attendance except Minnesota that abstained. North Dakota, New Mexico and Wyoming were not represented on the call."

3.3.4.2 HP's Perspective on the PO-19 Benchmark

HP adopted the 95% benchmark for reporting on findings for all phases of this test, as described in the HP SATE New Release Test Approach 9.0 Transaction Test document. The rationale for this benchmark included the fact that this benchmark was passed with a unanimous vote on the ROC and thus enjoys a wide acceptance within the Qwest territory, and that it is the last proposed benchmark for Arizona.

In preparing for the execution of the new release test, HP observed several issues in applying the meaning of the PID as an absolute standard:

- There currently exists no consensus on the benchmark for PID PO-19 in Arizona. It remains at impasse.
- This benchmark for PID PO-19 will be implemented in March 2002 for the ROC.
- The PID PO-19 formula that provides a basis for computing the Phase I results, uses a cumulative value of test results from all the currently supported IMA EDI releases (IMA EDI releases 7.0, 8.0 and 9.0). The accumulation of results from multiple releases is outside the scope of this evaluation.
- PO-19 measures accuracy of expected responses from scenarios defined in the SATE Data Document. These scenarios are to be tested during the 5-day "testing window", that is within five days after the new release is introduced in SATE. PO-19, therefore, can not be used as an absolute standard for the results for Phase III of this project.
- PO-19, as currently defined, measures transaction functionality, field characteristics, and transaction format for a set of scenarios defined in the SATE Data Document. It does not provide a way to measure the consistency of scenario content and legacy messages between SATE and production.

Based on the points above, HP has applied the following interpretation for the use of a benchmark for the SATE New Release Test:

- HP has applied the 95% benchmark for all three phases of this New Release Test.
- HP has applied the 95% benchmark in February as HP was tasked to perform the SATE New Release Test based on the PID PO-19 in February and SATE 9.0 was being implemented within the January/February time frame.
- As HP was tasked to test the SATE release for the 9.0 Version of IMA EDI, it has applied the PID PO-19 formula for the new release only, and not cumulative across all the supported releases in SATE as the formula in the PID is written.
- HP believes that each new release should individually meet the 95% benchmark. In lieu of an approved benchmark for Expected Results Verification, HP looked to standards for a quality measurement that have wide acceptance in the industry. HP has determined that a large body of software development organizations pursue a quality goal between 95% or 97.5%. HP chose the 95% benchmark due to the consensus vote for the SATE measurement across the ROC community, and because it is the last proposed value for the Arizona benchmark.
- HP believes that a benchmark of 95% is reasonable for Phase II. In lieu of an approved benchmark for Business Rules Testing, HP looked to standards for a quality measurement that have wide acceptance in the industry. HP has determined that a large body of software development organizations pursue a quality goal between 95% or 97.5%. HP chose the 95% benchmark due to the consensus vote for the SATE measurement across the ROC community in relation to the Expected Results Verification, and because it is the last proposed value for the Arizona benchmark. HP sees no reason to utilize a standard greater than what has been set for Expected Results Verification when evaluating Business Rules.

- HP believes that a benchmark of 95% is reasonable for Phase III considering that the purpose is to measure the Stability in Expected Results and assurance that Qwest has successfully implemented changes that are verifiable through Regression Testing. Since this test is a repeat of Phase I – Expected Result Verification with the exception of the timing, it is justifiable to utilize the same benchmark.

3.4 Methodology

This New Release transaction testing followed the general principles established in the Qwest EDI Implementation Guide (http://www.uswest.com/wholesale/ima/edi/document.html). It did not evaluate any transactions that fall outside of the available data supported within Release 9.0 of the SATE. It considered all IMA EDI Release 9.0 documentation that had been provided by Qwest.

The HP New Release Test of SATE did not include the "CLEC Experience" as it would occur if all parties followed the processes established for a CLEC start up or any of the processes specific to the use of SATE; rather, HP executed this transaction test in the role of an objective third party and trusted advisor to all parties – Qwest, ACC and the CLEC community.

The HP Test Harness supported an order entry tool and an EDI translation tool that allowed the entry and formatting of LSR's as prescribed by the Qwest pre-order and ordering rules for IMA EDI 9.0.

Once the orders were translated into the standard EDI format according to the Qwest 9.0 release specifications, they were sent on to SATE. Responses received from Qwest provided the basis for comparison to the Qwest IMA EDI 9.0 SATE Data Document for expected responses. This data was collected using the same technology that was used for the Arizona 271 OSS Test.

An Issues Management process was utilized to identify and manage resolution of New Release Transaction test issues across Phase I, Phase II and Phase III. Details of this process are provided in the SATE Issues Management Process found under separate cover.

A public call was held weekly to review the status of the New Release Transaction testing with all parties. All documentation and assistance made available to HP by Qwest for use by HP in the development and/or establishment of the IMA EDI 9.0 interfaces to the SATE have been made available to all participants to verify that HP has not being given special treatment.

3.5 Scenarios

HP executed the scenarios as they are presented in the IMA EDI SATE 9.0 Data Document, and listed in Appendix V of this plan.

HP employed the use of VICKI for response generation. This was done to eliminate the constraint of being able to receive FOC responses for only the first 10 transactions per day. HP did not undertake a comprehensive test of VICKI. HP utilized 10% of the available VICKI paths. Although the comment logs do document the use of VICKI on applicable scenarios, there is no relevance to the outcomes of this use, as HP did not maintain statistics specific to VICKI as part of this New Release Test of 9.0.

3.6 Variances

The following items have been addressed by HP during the SATE New Release Testing, yet represent variances to what was planned in the SATE New Release Test Approach 9.0 Transaction Test document.

3.6.1 SATE Data Documents

The purpose of Phase III was intended to evaluate the status of SATE five days prior to Release 9.0 being deployed into Production. In anticipation of the roll out of SATE Flow through capabilities, Qwest released an updated SATE Data Document v9.05. This release of the Data Document presented a large number of account data changes to facilitate the Flow Through capability. This significant Data Document change impacted the purpose of the Phase III testing. HP and Qwest compromised on a "special" release of the SATE Data Document v9.04a to allow HP to move forward with Phase III testing with the same account data that was utilized in Phase I. Although HP realizes the Data Document that rolled out with the Production deployment of IMA EDI Release 9.0 was significantly different than used in Phase III testing, HP believes that the special release of 9.04a allowed HP to compare the variance in results of Phase I to those of Phase III.

3.6.2 Phase IV Production Mirror Testing

HP originally included the production mirror test in the scope of the HP New Release Test Approach. This was due to HP' s interpretation of the language in PID PO-19. However, HP did not perform the Production Mirror phase of testing for the following reasons:

- HP was made aware that it's interpretation of PID PO-19 was contrary to the decisions that had taken place at a TAG meeting on September 27, 2002 where the production mirror language was rejected[2].
- HP revisited the results of the SATE Release 7.0 Evaluation and found that the execution of Phase IV, as written in the SATE New Release Test Approach 9.0 Transaction Test document would not have provided additional detail on the overall accuracy of production mirroring because it would only be testing the new release portion of a SATE release.

3.6.2.1 Production Mirror not accepted by Community

HP proposed modification to the PID PO-19 in reference to the inclusion 'production-mirror' test. Those PID changes, as proposed by HP, were subsequently rejected by the community in December 2001[3]. The following language from PID PO-19 indicates that the CLEC community and Qwest agreed to test the mirroring between SATE and the IMA EDI Disclosure Document.

> *"The successful execution of a transaction is determined by the Qwest Test Engineer according to:*
>
> - *The expected results of the test scenario as described in the IMA EDI Data Document – for the Stand Alone Test Environment (SATE) and the EDI disclosure document.*
> - *The transactions strict adherence to business rules published in Qwest's most current IMA EDI Disclosure Documentation for each release and the associated Addenda"*

HP revisited the need to perform the Phase IV Production Mirror testing in conjunction with HP's Recommendation 7 based on comments generated after review of HP's SATE New Release Test Approach 9.0 Transaction Test document. Per the following understanding, HP removed the

[2] The production mirror test has been raised to impasse with the ACC Staff, and is still under consideration at the time of this report.

[3] HP was asked in December of 2001 to provide comments to the PID. HP did so and included the following comment to the Description of PO-19: "The identical transactions (to those used to measure accuracy of the SATE), will be executed in production when the new release is installed in production." HP provided these comments and the comments were subsequently rejected by the community.

Production Mirror test from the scope of the SATE New Release Test Approach 9.0 Transaction Test document:

- The PO-19 measurement never provided for a measurement of Production Mirror accuracy

Finally, the HP New Release Test of SATE 9.0, listed as Recommendation 7 in the SATE Summary Evaluation Report - Final Version 3.0 dated 12/21/01, does not require the completion of a production mirror test to maintain the 'adequate' rating as summarized by HP. The recommendations as provided in the by HP Final Evaluation of the Qwest IMA EDI SATE are intended to ensure that the Qwest IMA EDI SATE remains adequate for the CLEC's needs going forward, not as a contingency for adequacy.

3.6.2.2 HP's SATE 7.0 Production Mirror Test

HP conducted a production mirror test during original SATE Transaction Evaluation. This test was based on functionality that HP had been certified to order through HP's Arizona 271 Interconnection. The functionality that was tested included: Address Validation, Customer Service Record Query, Service Availability Query, Facility Availability Query, Connecting Facility Availability Query, POTS, Un-Bundled Loop and UNEP-POTS. During the test, HP reported that 32 LSR pairs were submitted to the SATE 7.0 release and IMA EDI 7.0 Production Release. The results of the LSR's submission in SATE and subsequent production submission were compared for transaction functionality, field characteristics, transaction format and content. Based on those criteria, 7 discrepancies were detected. Of the seven discrepancies, only one related to the Qwest prescribed EDI format. The remainder was inconsistent based on behavior and content. HP provided an overall rating of the 7.0 Production Mirror to be inconclusive based on the unavailability of list detailing the errors in the SATE legacy back-office systems. Due to the lack of the Legacy Systems Edit List, HP created Recommendation 4 that requested Qwest publish variances between SATE and production business edits to ensure that CLECs are fully aware of any such discrepancies so that a CLEC may effectively develop its business processes in the simulated environment.

HP has completed additional analysis on the data that has been collected for SATE 7.0 where HP performed a production mirror test. HP has synthesized the results of the Phase IV production mirror testing into the following broad categories:

- Formatting
  - EDI mapping compliance
  - Data field attributes compliance
- Behavior
  - Legacy system generated messages
  - BPL layer messages
  - Responses

Table 4 – Error Count

Category	Error Count in SATE 7.0 Production Mirror Test
EDI Mapping and Data Attributes	1
BPL Message Discrepancies	2
Legacy Message Discrepancies	2

The above table shows HP's analysis for the single occurrence of an issue with EDI mapping and Data Field Attributes. Most issues HP encountered during the SATE 7.0 production mirror test were in the area of Behavior where HP noted that there was insufficient documentation available for the Legacy and BPL messages or there was a mismatch in message content received from SATE and

Production. The execution of Phase IV, as written in the SATE New Release Test Approach 9.0 Transaction Test document would not have provided additional detail on the overall accuracy of production mirroring, as it would only have tested new functionality added in release 9.0.

Due to the results of the 7.0 Production Mirror test indicating an inconclusive result only due to lack of available SATE information, HP can identify little reason to repeat a production mirror test.

3.7 Summary of Results

This section describes the results and analysis of transaction data collected in this evaluation. The evaluation and opinion of these results are covered in the Section 3.8 Evaluation.

3.7.1 Availability of New Release in SATE

HP was able to verify the presence of Release 9.0 in SATE on January 30, 2002. This represents the release being available 28 days before the production release of IMA EDI 9.0 was deployed. HP validated this availability by performing a connectivity test. Qwest indicates that Release 9.0 was available on January 28, 2002 in SATE. HP had a kick off meeting on January the 28th as per documented process. Qwest approved all the paperwork by the 29th of January, which brought HP to the capability of testing on the 30th of January. HP did not encounter any outage related problems with SATE during this evaluation.

3.7.2 Performance Measures

Each phase provides a conclusion as to the original percent of unexpected results in relation to the total number of scenarios executed. Additionally, the percentage of re-tested transactions that initially had unexpected results which later met expected outcomes after corrective action was taken by Qwest is provided. The re-test results do not contribute to the overall evaluation of each test phase.

For Phases I through III, HP submitted a total of 667 scenarios, which represents approximately 2,500 transactions (each scenario may generate several transactions, depending on the scenario. For example, a Pre-Order query is considered as one transaction, as is the query response from SATE). For the 667 scenarios, 636 include the original scenarios developed as part of HP's test case matrix, and the other 31 are re-tests of scenarios that did not return the expected responses.

Table 5 - SATE New Release Test Report provides a summary of each transaction test evaluation method with the following details:

Phase - The column labeled *Phase* identifies the Evaluation Method utilized to generate the related transaction test information.

The phases are categorized as follows:

- **Phase I** - Expected Results Verification
- **Phase II** - Business Rules Testing
- **Phase III** - Expected Results Verification for Stability and Regression Testing

Total Scenarios - The total scenarios represent the sum of scenarios executed within each environment. Each scenario can account for anywhere from two to twelve transactions.

Total Unexpected Results - The total unexpected results represent the sum of scenarios that produced a "fail" or unfavorable outcome. A scenario was considered to "Fail" if the scenario produced a response that did not match the expected result in the data document or HP's expected result.

% Error - The percentage of error is calculated as the total unexpected results divided by the total scenarios executed.

Total Retest Complete - This represents the total number of scenarios that were successfully re-tested. The scenarios that were candidates for re-test are represented in the Total Unexpected Results column.

% Retest Successful - This represents the overall percentage of tests that were successful after re-test as compared to the number of total scenarios executed. This percentage is calculated as the (Total Scenarios minus Total Unexpected Results Plus Total Retest Complete) divided by the total Scenarios.

Table 5 - SATE New Release Test Report

Release 9.0 Testing Phase	Total Scenarios	Total Unexpected Results	% in Error	% Successful	Total Retest Complete	% Retest Successful
Phase I - Expected Results Verification						
Initial Transaction Execution: Began 1/31/02 - Ended 2/7/02 Re-tests Ended 2/15/02						
Trading Partner – HP9						
Regression	96	10	10.42	89.58	9	98.96
Progression	158	8	5.06	94.94	8	100.00
sub-total	254	18	7.09	92.91	17	99.61
Phase II – Business Rules Testing						
Initial Transaction Execution: Began 2/13/02 – Ended 2/15/02 Retests Ended 2/28/02						
Regression	60	4	6.67	93.33	1	95.00
Progression	62	13	20.97	79.03	0	79.03
sub-total	122	17	13.93	86.07	1	86.89
Phase III – Expected Results Verification for Stability and Regression Testing:						
Initial Transaction Execution: Began 2/18/02 – Ended 2/22/02 Re-tests Ended 2/27/02						
Regression	96	7	7.29	92.71	6	98.96
Progression	164	7	4.27	95.73	7	100.00
sub-total	260	14	5.38	94.62	13	99.62
Total Results	636	49	7.70	92.30	31	97.17

3.7.2.1 Phase I Test

For Phase I, HP submitted a total of 96 regression scenarios and 158 progression scenarios giving a total of 254 scenarios. Regression scenarios were used to verify expected results for products HP is already certified for ordering within IMA EDI version 7.0. Progression scenarios were used to verify expected results for products that HP is not certified for ordering within IMA EDI Version 7.0.

For this test, 18 scenarios returned unexpected responses when compared to the expected results as documented in the SATE Data Document 9.0. These unexpected responses correspond to an accuracy ratio of approximately 93% when compared to the total number of scenarios executed.

In this test, HP encountered the following types of issues:

Table 6 – Test Issues

	Type of Issue	Formal Issue Tracking Number	Status
Formal Issues			
	Business Rules		
		2033	Closed
Candidate Issues			
	Business Rules		
		9030	Closed
	EDI Mapping		
		9023	Closed
		9018	Closed
		9026	Closed
	Environment		
		9029	Closed
		9025	Closed
		9015	Closed
		9020	Closed
		9021	Closed
		9027	Closed

HP submitted one formal issue that has been closed with an unresolved status. HP was able to retest a total of 17 scenarios, which resulted in a final accuracy ratio of 99.61%.

3.7.2.2 Phase II Test

For Phase II, HP submitted a total of 60 regression scenarios and 62 progression scenarios giving a total of 122 scenarios. Regression scenarios were used to verify expected results for products HP is already certified for ordering within IMA EDI version 7.0. Progression scenarios were used to verify expected results for products that HP is not certified for ordering within IMA EDI Version 7.0.

For this test, 17 scenarios returned unexpected responses when compared to the results that HP expected based on the Appendix E and Appendix F change summaries of the IMA EDI Disclosure Documents for IMA EDI Release 9.0 changes. These unexpected responses correspond to an accuracy ratio of approximately 86% when compared to the total number of scenarios executed.

In this test, HP encountered the following types of issues:

Table 7 – Phase II Test Issues

	Type of Issue	Formal Issue Tracking Number	Status
Formal Issues			
	Business Process		
		2037	Closed
	Business Rules		
		2034	Closed
		2039	Closed
		2042	Closed
	Documentation		
		2040	Closed
		2043	Closed
		2044	Closed
	EDI Mapping		
		2036	Closed
	Environment		
		2035	Closed
		2038	Closed
		2041	Closed
		2045	Closed
Candidate Issues			
	EDI Mapping		
		9028	Closed

HP submitted 12 formal issues and all issues have been Closed. HP was able to retest a total of 1 scenario, which resulted in an accuracy ratio of 86.89%.

HP did further analysis on those scenarios that did not return the expected response in order to determine what component of the business rules caused the error. HP considered the broad scope of business rules to be made up of multiple sub-categories. In conducting this analysis, HP categorized unexpected responses into two categories – those measured by PO-19, and those that are not measured by PO-19. Our analysis is as follows:

Performance Measured by PO-19

- **EDI Mapping**: These set of rules define the syntax and the form of information that is being exchanged between two collaborating entities. These rules dictate the type of message to be used for what purpose (e.g. 850, 855, 860, 865, 836). The components and order of the segments that each message contains and the details that would allow one to uniquely represent the type of data to be contained by a segment. (e.g. The DTM segment is used to tag data that is a date). There are rules that that dictate the literal that would be used to represent a completion date versus a jeopardy date versus a sent date.

- **Compliance to the disclosure document**: This sub-category classifies errors caused by implementation not conforming to what has been defined in the IMA EDI disclosure documentation
- **Compliance to TCIF guidelines:** This sub-category classifies errors caused by implementation not conforming to TCIF and X12 standards

- **Data Attributes**: This type of business rule defines the domain of each field that is going to be used in sending and receiving information between two systems. It deals with data types, masks, length and number of occurrences.
  - **Consistency with OBF**: These rules govern data attribute exceptions in implementation to what has been defined by the OBF.
  - **Consistency with Disclosure**: These rules govern data attribute exceptions in implementation to what has been defined by Qwest in their IMA EDI Disclosure documentation.
- **Workflow**: Workflow defines the expectation of messages that are exchanged between a CLEC and Qwest during the process of order fulfillment. These messages have a cause and effect relationship as well as an expectation of turnaround time. (e.g. A 997 is received by the CLEC when they transmit an 850 the CLEC expects an 855 transaction within a certain time period dictated by the product being ordered).
  - **Pre-Order Responses**: Errors in the expected responses received during the preordering process.
  - **Functional Acknowledgement Responses**: Errors in expected responses received to acknowledge receipt and well formedness of message (e.g. 997)
  - **Post Order Responses**: Errors in expected responses received after an order has been issued

Performance Not Measured by PO-19

- **Product Consistency Edits**: These types of business rule definition deals with declaring boundary conditions, inclusion and exclusion conditions and behavior. This type of business rule interacts with what is contained in the data rather than how it has been formatted. It is this edit that usually modifies the flow of an order and causes appropriate business events. (e.g. an action of A is used for a New while an Action of W is used for an Assume. Both these orders could follow a different path during order fulfillment).
  - **Behavior**:
    - **Data Edits**: Errors caused because of invalid values that are contained within a data field. (e.g. the state specified in a service address should fall within the list of states where Qwest is tariff to do business for a particular product).
    - **Cross data edits**: Errors caused because of incompatible data contained in fields that are related. (e.g. a state is mandatory when a street address is specified).
  - **Error list implementation**: Errors caused due to lack of clarity of what errors are caused under what conditions.
  - **Legacy system simulation**: Errors caused because of inconsistent behavior by legacy systems
- **Environment Constraints**: These are rules that govern the pricing and discount models, the availability expectations as well as the special handling agreements that are negotiated between Qwest and a CLEC. These sub-categories do not apply to this analysis.
  - **Implementation Constraints**
  - **Business constraints**
    - SLA
    - Standard interval
    - Tariff rules
    - Availability

- Capacity

Table 8 – Scenario Responses shows the breakdown of unexpected responses within these sub-categories. HP utilized the Phase II scenario summary worksheets in combination with the Phase II Comments logs to support these findings. Please note that only scenarios that have been reported in the Phase II Comments log as Original errors are included in this detailed analysis.

Phase II performance, as measured by PO-19, indicates that 97% (96.6) of transactions yielded expected results in terms of EDI Mapping, Data Attributes, and Workflow. In the area of product consistency, which is not measured by PO-19, HP observed a level of unexpected results of approximately 14% (13.9).

Table 8 – Scenario Responses

Scenarios with unexpected responses		EDI Mapping		Data Attributes		Workflow			Product Consistency Edits			
Number	Description	Compliance to Disclosure Document	Compliance to TCIF guidelines	Consistency with OBF	Consistency with Disclosure Document	Pre-Order Responses	Functional Acknowledgement Response	Post-Order Responses	Behavior-Data Edits	Behavior-Cross Data Edits	Error List Implementation	Legacy System Simulation
LQQ2b	Unbundled ADSL by Address -- Bad Response	X										
AVQ10	Address Validation by Address – Good					X			X			X
TNAQ3b	Availability Query - Bad Response	X									X	
CSR2a	CSRQ - CSR by TN and Address Good Response					X			X			
LQQ4d	Loop Level Data by Address -- Bad Response					X					X	
LQQ4e	Loop Level Data by Address -- Bad Response					X					X	
LQQ4g	Loop Level Data by Address -- Bad Response					X					X	
LQQ4u	Loop Level Data by Address -- Bad Response									X	X	
POTS1	POTS New Installation								X	X	X	
POTS2a	POTS Change Multiple Line Accounts	X								X		
UDL1b	New loop installation								X	X	X	
CEX6a	Centrex Plus Conversion of POTS Account to Centrex Common Block								X	X	X	
UNEP4b	UNE-P POTS Conversion w/ DL - Single Line	X							X	X		X
UNEP14	UNE-P POTS Outside Move										X	
DL3a	Straight Line Change LAL								X			
DL6	Straight Line Change LXL								X	X	X	
	Totals:	4	0	0	0	5	0	0	8	7	10	2
		4		0		5			27			

3.7.2.3 Phase III Test

For Phase III, HP submitted a total of 96 regression scenarios and 164 progression scenarios giving a total of 268 scenarios. Regression scenarios were used to verify expected results for products HP is already certified for ordering within IMA EDI version 7.0. Progression scenarios were used to verify expected results for products that HP is not certified for ordering within IMA EDI Version 7.0.

For this test, 14 scenarios returned unexpected responses when compared to the expected results as documented in the SATE Data Document 9.0. These unexpected responses correspond to an accuracy ratio of approximately 95% when compared to the total number of scenarios executed.

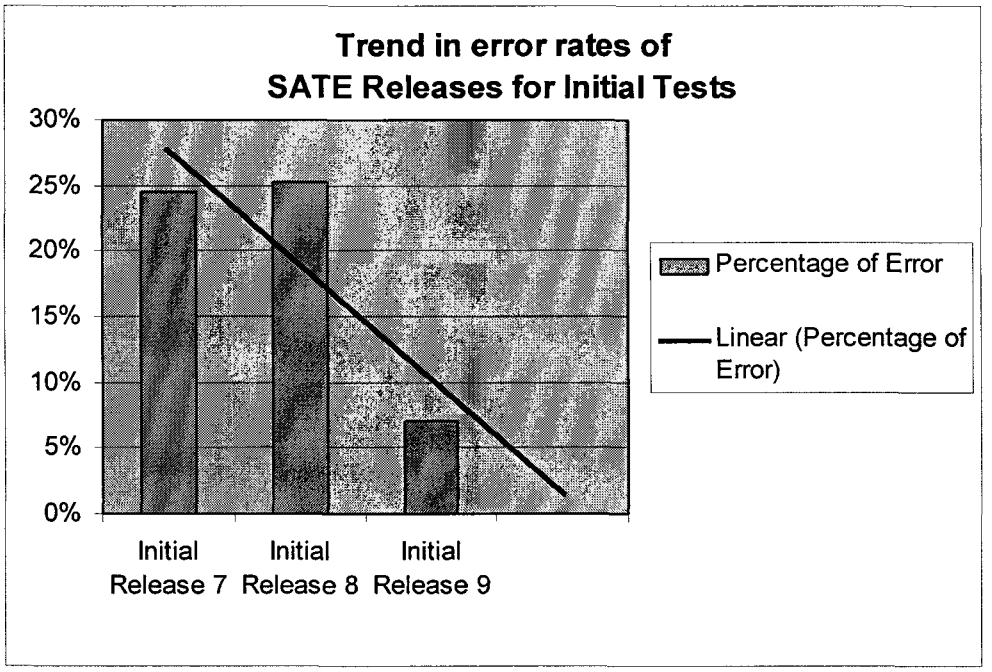
In this test, HP encountered the following types of issues:

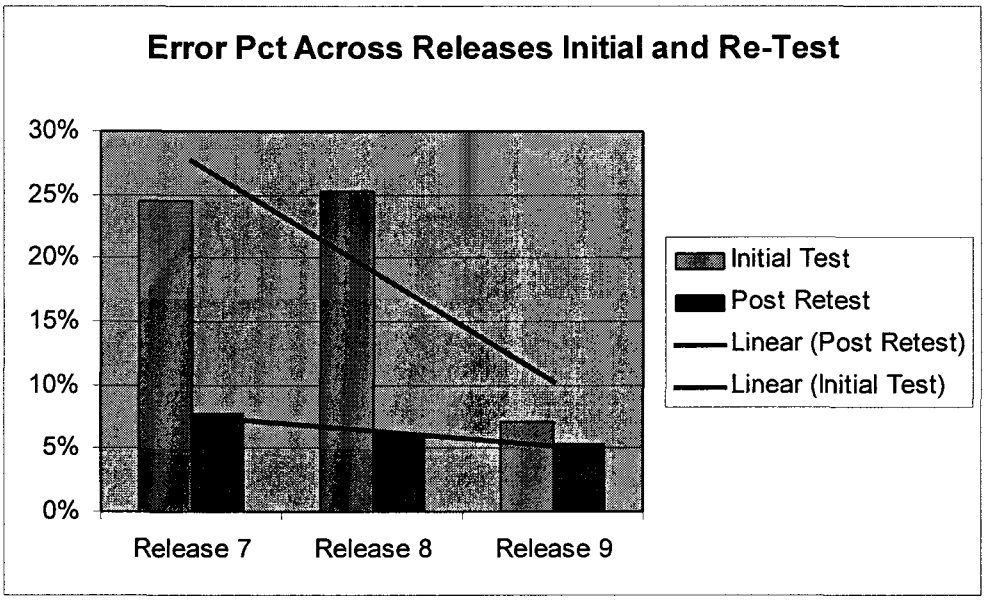
Table 9 – Phase III Issues

	Type of Issue	Formal Issue Tracking Number	Status
Candidate Issues			
	Business Rules		
		9022	Closed
	Environment		
		9016	Closed
		9024	Closed
		9014	Closed
		9017	Closed
		9019	Closed

HP submitted no formal issues for this phase. HP was able to retest a total of 13 scenarios, which resulted in a final accuracy ratio of 99.62%.

HP also analyzed the trend in the change to the accuracy percentage utilizing historical data that shows the error percentage by release for transaction testing of the scenarios available in SATE for releases 7.0, 8.0 and 9.0 (data for releases 7.0 and 8.0 taken from previous evaluation by HP, and included as part of the HP SATE Summary Evaluation Report issued on December 21, 2001). As shown below, the verification of expected results across releases shows that there is a positive trend in the level of accuracy which indicates that the implementation of future releases of IMA EDI into the SATE should provide a better than 95% level of accuracy.





3.7.3 Use Of VICKI

HP did make use of VICKI (Virtual Interconnect Center Knowledge Initiator) for portions of this evaluation. HP's intent was not to test the full functionality offered by this new feature, but to use it to accelerate the test (allows HP to receive automatic transactions from SATE that were manually generated before this feature was added). The following table summarizes the use of VICKI throughout Phase I and Phase III testing. The following defines the different headings:

- **VICKI Path Number** – The Qwest defined path used in VICKI (set of responses produced from chronological system events)
- **Remarks** – Description of the specific VICKI Path.
- **Number of times the VICKI path was used** – Represents the number of scenarios for Phase I and III that used this specific Path.

Table 10 – VICKI Paths

VICKI Path Number	Remarks	Number of times the VICKI path was used
1	Test: Non-Fatal then Reject	30
13	Test: Double FOC	1
30	Prod: FOC Jeopardy	16
31	Prod: FOC Jeopardy	1
39	Prod: Hold Jeopardy	13
40	Test: Hold Complete	15

VICKI Path Number	Remarks	Number of times the VICKI path was used
46	Prod: Hold Complete	1
Total		77

The following table summarizes the use of VICKI responses by SATE product.

Table 11 – VICKI Responses by SATE Product

Product	VICKI Path Number	Remarks	Number of times VICKI was used
CEX	1	Test: Non-Fatal then Reject	4
	30	Prod: FOC Jeopardy	4
	39	Prod: Hold Jeopardy	3
	40	Test: Hold Complete	4
DL	1	Test: Non-Fatal then Reject	3
	30	Prod: FOC Jeopardy	2
	39	Prod: Hold Jeopardy	3
	46	Prod: Hold Complete	1
LNP	1	Test: Non-Fatal then Reject	2
	13	Test: Double FOC	1
	30	Prod: FOC Jeopardy	2
	39	Prod: Hold Jeopardy	1
	40	Test: Hold Complete	2
POTS	1	Test: Non-Fatal then Reject	2
	30	Prod: FOC Jeopardy	2
	39	Prod: Hold Jeopardy	1
POTS	40	Test: Hold Complete	2
SHL	1	Test: Non-Fatal then Reject	2
	30	Prod: FOC Jeopardy	2
	39	Prod: Hold Jeopardy	1
	40	Test: Hold Complete	2
UBL	1	Test: Non-Fatal then Reject	2
	30	Prod: FOC Jeopardy	2
	39	Prod: Hold Jeopardy	1
	40	Test: Hold Complete	2
UCEX	1	Test: Non-Fatal then Reject	2
	31	Prod: FOC Jeopardy	1
	39	Prod: Hold Jeopardy	2
	40	Test: Hold Complete	1

Product	VICKI Path Number	Remarks	Number of times VICKI was used
UDL	1	Test: Non-Fatal then Reject	3
UDLNP	1	Test: Non-Fatal then Reject	7
UNEP	1	Test: Non-Fatal then Reject	3
	30	Prod: FOC Jeopardy	2
	39	Prod: Hold Jeopardy	1
UNEP	40	Test: Hold Complete	2
Total			77

HP was able to use VICKI on 77 scenarios, and encountered no issues related to VICKI.

3.7.4 Commercial Usage

During the course of this evaluation, HP submitted a data request to Qwest to determine the extent of commercial usage of SATE by CLECs in developing their EDI interfaces for new releases of IMA EDI. HP received the following information:

- Two CLECs used SATE to successfully develop to 7.0. Three CLECs have used SATE to successfully develop to 8.0; One Service Bureau has used SATE in 8.0 to test on behalf of five CLECs. Including the service bureau, eight CLECs have used SATE to successfully implement 8.0. No CLECs have yet been placed into production on 9.0.
- Four CLECs are currently using SATE to develop to 8.0. One CLEC is currently using SATE to develop to 9.0. No CLECs are currently using SATE 7.0 to develop to IMA 7.0.

3.8 Evaluation

This section addresses the evaluation of the *adequacy* of SATE in assisting CLECs in developing for new releases for the IMA EDI production environment. The table below was taken from the SATE New Release Test Approach 9.0 Transaction Test document, and provides a basis for evaluating the results measured in this evaluation. The overall assessment is based on the combination of the individual criteria, and the materialness of the issues when compared with HP's understanding of PID PO-19.

Table 12 – Evaluation

Criteria	Results[1]	Summary
HP will confirm the 9.0 SATE test data is valid per the results of the Phase I testing. Phase I - Expected Results Verification Is the Scenario Data supplied as	U	Based on the results of Phase I testing the rating of Unsatisfactory is warranted. When using the formula of PO-19 for New Release testing of the Release 9.0 Data Document the results were 92.9%. When compared to a benchmark measure

[1] S = Satisfactory
U = Unsatisfactory
I = Inconclusive - Re- test Required
N = Not available - Test In Progress

Criteria	Results[1]	Summary
documented in the Release 9.0 SATE Data document available to the community as it is intended to be per the specifications provided? Is the outcome of the execution of the Release 9.0 SATE provided scenarios equal to the expected results as they are documented in the Release 9.0 SATE Data Document?		of 95% there is a variance of a negative 2.1% level of accuracy. HP realizes that this measure, as defined in PO-19, is meant to apply to all releases currently available in SATE, while this result is for the accuracy of release 9.0 scenarios only. HP was also able to verify that release 9.0 of SATE was available for use 28 days before deployment in the IMA EDI production environment. Please see HP Recommendations in Section 2.2
HP will confirm that the 9.0 SATE business rules are consistent with the rules published in the Qwest IMA EDI 9.0 Network Disclosure Documentation, Appendix F and Appendix E. This verification will be accomplished through Phase II - Business Rules Testing • Does the SATE capture Business Process Layer edits and Back-office Legacy system errors that may be caused by LSR ordering mistakes as they are documented in the Qwest error lists provided for Release 9.0? • Does the SATE employ the updated business rules edits as provided in the IMA EDI 9.0 Release documentation?	U	HP conducted this test based on its interpretation of the PID PO-19 language that calls for strict adherence to business rules. HP's current understanding of the PID PO-19, as it is written, does not provide any formula to draw inference of the level of adequacy for business rules validation. HP has provided the results obtained per the execution of scenarios where expected results were based on business rules that changed due to the implementation of Release 9.0. This was determined by analysis of the Release 9.0 Disclosure Documentation. The results show an 87.3% (after re-test) level of accuracy for the scenarios executed. Based on the initial benchmark or 95%, this criteria is given an unsatisfactory rating. Phase II performance, as measured by PO-19, indicates that 97% (96.6) of transactions yielded expected results in terms of EDI Mapping, Data Attributes, and Workflow. HP believes that the level of performance is adequate to support CLEC new release testing. In the area of product consistency, which is not measured by PO-19, HP observed a level of unexpected results of approximately 14% (13.9). These unexpected responses were not used by HP in its determination of adequacy and are included for information purposes only.

Criteria	Results[1]	Summary
		See HP Recommendations in section 2.2.
HP will confirm the results of a scenario in SATE will match the results of a similar scenario in IMA EDI 9.0 production. This will be verified through Phase IV – Production Mirror Testing. • Does the SATE react to transactions with the same results they would receive if submitted in the IMA EDI 9.0 Production environment?	N/A	HP planned to conduct this test based on its interpretation of the PID PO-19 language that calls for Production Mirror. HP's current understanding of the PID PO-19, as it is written, does not provide any formula to draw inference of the level of adequacy for production mirror validation. HP did not conduct this test. See HP Recommendations in section 2.2
HP will confirm the SATE returns consistent responses. This will be verified throughout Phase II and Phase IV of New Release testing. • Do transactions submitted in SATE 9.0 produce consistent responses when the same transaction is executed in SATE across the testing phases? • Do transactions submitted to the SATE for Release 9.0 produce consistent responses for like transactions in Production IMA EDI Release 9.0?	N/A	Due to the fact that Phase IV was never performed, this evaluation criteria is not applicable to this New Release Test of 9.0. See HP Recommendations in section 2.2.

Criteria	Results[1]	Summary
HP will confirm that the IMA EDI SATE 9.0 supports all transactions described in the SATE supporting documentation. • Are the scenarios supported in the 9.0 SATE inclusive of the products and activities that are required to support the business processes of a CLEC's operations in AZ? • Are new products and services made available through the implementation of the new IMA EDI release 9.0 made available in SATE?	S	SATE does support the products required by a CLEC doing business in the state of Arizona. This is based on evidence supported by Qwest's response to HP's data request HP DEC01-001. Furthermore, Qwest demonstrated the ability to add new functionality to SATE with this new release of 9.0 as shown through the implementation of the new Pre-Order LQQ - Loop Qualification Query/Response.
HP will confirm the 9.0 SATE accurately supports all post-order transactions and functional acknowledgements. • Do the SATE responses get created per the expectations set by the documented time frame? • Do the SATE responses received provide expected outcomes? • Do the SATE responses received provide comprehensive messages when warranted by the test scenario? • Does the SATE accurately support all pre-order and post-order transactions and functional acknowledgements?	S S U S S	An overall result of Satisfactory is warranted as HP did confirm that all pre-order, post order and functional acknowledgments that are available in SATE are adequately supported. This is documented further through the Transaction Test scenario summaries that show the send and receive dates of those transaction types across all of the testing phases completed. There is one exception to this overall evaluation of Satisfactory. That is in relation to the second criteria question. Phase I testing has provided results that indicate the expected outcomes documented in the Data Document were not always accomplished. See HP Recommendations in section 2.2
HP will determine whether the SATE adequately accommodates new release testing. Based on the ranking applied, and the comments provided in the summary column: HP will determine if the overall transaction functionality provided by SATE is adequate for CLEC New	S	The Phase I testing outcome produced a 93% level of accuracy in expected results. While this result does not meet the PO-19 benchmark of 95% the margin of shortfall is small. In addition, HP has observed a clear trend across release 7, 8 and 9.0 testing is showing that Qwest should achieve the 95% accuracy rate with the next implementation of IMA EDI changes into SATE.

Criteria	Results[1]	Summary
Release Testing.		Although the transaction results for Phase II did not meet the benchmark specified for this evaluation, HP believes that SATE demonstrated better that 95% accuracy in scenarios that dealt with transaction functionality, field characteristics, and transaction format. HP concludes that Qwest has provided a 95% accuracy when comparing expected results to the actual results during the Phase III transaction test. This has provided a strong indicator that SATE is maturing as expected in supporting an environment for CLEC interconnection testing.

3.9 Summary of Activities

This New Release transaction test utilized a new HP trading partner ID - HP9 that was defined specifically for this test. . HP utilized an internal SATE test environment that supported an order entry tool and an EDI translation tool that allowed the entry and formatting of LSR's as prescribed by the Qwest pre-order and ordering rules for IMA EDI 9.0. Once the orders were translated into the standard EDI format according to the Qwest 9.0 release specifications, they were sent on to SATE. Responses received from Qwest provided the basis for comparison to the Qwest SATE Data Document expected responses. This data was collected using the same technology that is currently used for the Arizona 271 OSS Test.

An Issues Management process was utilized to identify and manage resolution of New Release transaction test issues that may potentially cause a negative evaluation. Details of this process are provided in the SATE Issues Management Process found separately.

A public weekly call was held to review the status of the New Release testing with all parties. All documentation and assistance made available to HP by Qwest for use by HP during the New Release test of SATE will be made available to all participants to verify that HP was not being given special treatment.

All New Release transaction test results have been captured in a number of Microsoft Excel worksheets. They are all enclosed as appendices to this report. The transaction test results have been captured on these worksheets and provided to the community each week. These worksheets include Qwest's standard Scenario Summary worksheets as well as HP's standard Transaction Test Scenario Comments Log. A Scenario Summary worksheet exists for each Phase of the Transaction Test as well as a corresponding scenario Comments Log. The Scenario Summary worksheet lists each scenario that was submitted with the date the LSR was sent to Qwest, and the date a corresponding response was received by HP. The Comments Log also lists each scenario with the outcome status. If the outcome was not successful then HP enters a comment on the log that details the transaction processing events and the unexpected results. Qwest reviews the Comments Log, and the appropriate action is taken to bring resolution to the unfavorable result. Those scenarios that remained unresolved on the Comments log at the end of a testing Phase were moved to the formal Issues process. The Comment log is updated to explain the movement of the tracking of the item to the formal Issues process.

The following worksheets exist and have been included as appendices to this report: Phase 1 Summary Regression

- Phase 1 Summary Progression
- Phase 1 Comments Regression
- Phase 1 Comments Progression
- Phase 2 Summary Regression
- Phase 2 Summary Progression
- Phase 2 Comments Progression
- Phase 2 Comments Regression
- Phase 3 Summary Regression
- Phase 3 Summary Progression
- Phase 3 Comments Regression
- Phase 3 Comments Progression

4.0 Issues

4.1 Overview

As part of its SATE Evaluation Plan, HP developed an Issues Management Plan to address the issues encountered during this engagement. The purpose of this plan was to provide the ACC, Qwest, and the CLEC members of the TAG a vehicle for tracking issues identified by HP, and understand the methodology used by HP in identifying and resolving issues. This section briefly describes the methodology used by HP, and the results of executing this plan.

4.2 Methodology

As described in HP's Issue Management Plan, an issue was assumed to be a gap between the actions of the Qwest documented processes and applications and stakeholder expectations. Issue Management was the process used to close that gap by analyzing the problem and determining the proper corrective action. It consisted of identifying, documenting, tracking, prioritizing, resolving, and communicating to project stakeholders the issues that arose during the overall HP evaluation.

Issues were tracked to the four Evaluation Domains: Documentation, Co-Provider Input, Process and Transaction. Transaction issues were further broken down into the following sub-categories:

- Regression/Progression: Issues related to this sub-test of the overall transaction test.
- Negative: Issues related to negative testing.
- Production Mirroring: Issues related to testing the production mirroring functionality of SATE
- Business Rules: Issues related to unexpected responses due to business rules.
- EDI Map: Issues related to unexpected errors with EDI Mapping.
- Documentation: Issues uncovered during transaction testing that did not match Qwest documentation.

During the course of the evaluation, questions or problems were noted by the HP team, and logged on a Question Log. This log was used as a way of tracking candidate issues, and communicating them to Qwest. Inputs to this log could have come from several sources: reading Qwest documentation; analyzing transaction responses; questions raised during weekly calls with Qwest; questions raised during process interviews with Qwest; or analyzing CLEC and Qwest input on SATE design.

The severity of issues were classified according to the following definitions:

- Low severity issues were those that did not impact the completion of a transaction test scenario, or the completion of any of the specific review or the overall evaluation. Examples of low severity issues could have included:
  - Editorial issues with documentation
  - Completeness of an Individual CLEC (Co-Provider) interview
- Medium severity issues were those that impacted the completion of a transaction test scenario, but did not impact the completion of other transaction test scenarios or any of the specific review or the overall evaluation. Examples of medium severity issues could have included:
  - Ability to complete test scenarios for a certain product type
  - Unable to open or print a document.
  - Unable to schedule interviews for a process evaluation.
  - Process failures based on the expectations set by documentation.
  - Unexpected Transaction errors.
- High severity issues were those that impacted the completion of the transaction test, the completion of a specific review, and the completion of the overall evaluation. Examples of high severity issues could have included:
- EDI Interface down for a period of time impacting the ability to enter test transactions
- T1 Lines not working impacting the ability to enter test transactions
- New revisions to SATE environment requiring development/upgrades to HPC interface.
- Digital Certificate, IA/IA, Firewall or other security barriers that cause interconnection delays
- IMA EDI SATE Stub environment producing inconsistent or no responses as expected per the IMA EDI disclosure documentation
- IMA EDI SATE application changes required as noted by Qwest's internal change request generation.

Issues were also tracked according to its status throughout its resolution. The following status categories were used:

- Candidate: A problem or question that has been identified and logged as a potential issue.
- Open: A candidate issue that has been clarified as an issue.
- Under Investigation: An issue that has a defined corrective action plan, and is being worked on by Qwest.
- Resolved: An issue that has been corrected according to Qwest's corrective action plan, and being verified by HP.
- Verified: An issue that has been resolved and the correction verified by HP.
- Impasse: An issue that has reached impasse, and transferred to ACC staff for resolution.
- Closed: An issue that has been resolved and verified by HP, and closed.
- Closed – Unresolved: An issue that has been resolved verified and closed but unresolved. If there were open questions or comments against closing the issue, and HP was not able to come to agreement before the end of the evaluation, HP changed the status of the Issue in the Issues tracking system to Closed – Unresolved.

4.3 Results

The following table summarizes the issue candidates identified and tracked by HP via the HP Formal Issue Process during this engagement. Please see Appendix A for complete details on each issue candidate.

Table 13 – Candidate Issues

Candidate Sequence Number	Domain	Candidate Issue Statement	Comments

Candidate Sequence Number	Domain	Candidate Issue Statement	Comments
9014	Transaction Test	Phase 3 Regression testing of the 9.0 Data Document using the scenarios for AAQ6, AAQ7, and AAQ8 did not return the expected responses.	02/21/02: HP submitted request and received did not receive the expected response. The ABTIME was missing from the AAR. This is not a new error as it was present in the first transaction test and HP did not identify the error. 02/22/02: HP: This item remains open. HPC will prepare a formal issue management document. 02/25/02:Qwest: This is fixed in the current version of the data document. 02/26/02: HP: Ver 9.07 of the Data Document no longer includes the ABTIME in the expected results.
9015	Transaction Test	Phase 1 Regression testing of the 9.0 Data Document using the scenario for AVQ7 did not return the expected response.	01/31/02: HP submitted transaction and received the expected response type. However, the SATE 9.03 Data Document indicates that X Fireside Drive will also return "FLR 2" and the LD2/LV2 combination for "FLR 2" was not returned in the AVR response. 02/01/02: Qwest: CR 37059 was created to resolve this issue. 02/07/02: Qwest: Distributed the SATE Data Document 9.0 v05. 02/07/02: HP: Retested and received expected response. 02/08/02: Qwest: 37059 is targeted to be placed into production SATE this weekend and to be available to test on Monday.

Candidate Sequence Number	Domain	Candidate Issue Statement	Comments
9016	Transaction Test	Phase 3 Progression testing of the 9.0 Data Document using the scenarios for CEN3 and CEN4 did not return the expected responses.	02/20/02: HP submitted PON=R9PB-CENC-00301 and received the FA. Expecting VICKI path [39]. Received error: "EU Form:Location and Access Section 2:Address validation failed". The scenario has been re-checked and the discrepancy cannot be identified as this same scenario was successful in Phase I testing and the address data matches the v9.04 Data Document. This appears to be an error. 02/21/02: HP received the newly distributed SATE v9.04a Data Document. 02/21/02: HP corrected the VICKI remark path and resubmitted PON=R9PB-CENC-00302. (The Phase I scenario did not contain a VICKI path.) Received the FA. Expecting VICKI path [39]. Received error: "EU Form:Location and Access Section 2:Address validation failed". HP confirmed that the address data matches the v9.04a Data Document. This appears to be an error. 02/21/02: HP sent e-mail inquiry to Qwest. 02/21/02: Qwest: Use MPLS in the city field instead of Minneapolis. CR 38026 was created to fix the data document. 02/22/02: HP: Retested using this corrected data (TID=152750 PON=R9PB-CENC-003-A). Expecting VICKI path [39]. Received FOC and SU. Expecting 865JEOP. 02/25/02: Qwest: This is fixed in the current version of the data document. 02/27/02: HP: This has been corrected in the 9.07 ver of the Data Document.
9017	Transaction Test	Phase 3 Regression testing of the 9.0 Data Document using the scenario for CSR11 did not return the expected response.	02/18/02: HP submitted request and received the expected response. However, the CITY data value was followed by a trailing comma which is not depicted in the SATE v9.04 Data Document. This is not a new error as it was present in the first transaction test and HP did not identify the error.

Candidate Sequence Number	Domain	Candidate Issue Statement	Comments
			02/21/02: Qwest: CR 38050 was entered to remove the comma from the system data. 02/27/02: HP: This has been corrected.
9018	Transaction Test	Phase 1 Regression testing of the 9.0 Data Document using the scenario for CSR2 did not return the expected responses.	02/01/02: HP submitted transaction and received expected response type. However, the CSRR appears to have mixed-up the MTX02 data values of RSID, PIC, PCA and LPIC: N9|JH|RSID|FFID MTX||5123 N9|JH|PIC|FFID N9|JH|PCA|FFID MTX||R28 N9|JH|LPIC|FFID N9|JH|EDT|FFID Request that Qwest evaluate the CSRR EDI mapping for the USOC FIDs. 02/05/02: Qwest: Advised that a CR has been opened to address this issue: CR 37072. 02/06/02: Qwest: Advised that the fix for CR 37072 was completed. 02/07/02: HP: Re-submitted transaction and received the expected response.
9019	Transaction Test	Phase 3 Regression testing of the 9.0 Data Document using the scenario for CSR9 did not return the expected response.	02/18/02: HP submitted request and received the expected response. However, the SATE 9.04 Data Document depicts that in addition to the data described, a message is also returned: "Message Returned:All requested WTNs/ECCKT were found on the CSR returned". This message was not present in the response. This is not a new error as it was present in the first transaction test and HP did not identify the error. 02/22/02: HP: This item remains open. HPC will prepare a formal issue management document. 02/27/02: HP: The message was removed from the data document.
9020	Transaction Test	Phase 1 Regression testing of the 9.0 Data Document	02/01/02: HP submitted the transaction and received the expected response. The

Candidate Sequence Number	Domain	Candidate Issue Statement	Comments
		using the scenarios for FAQ10 and FAQ5 did not return the expected responses.	one exception that should be noted is that the error message received did not match the error listed in the data document. The Data Document indicates "· Unable to locate specified Address· OSS Gateway: VERIFY STREET NAME Message[0] Verify Street Name entry.· Address Validation is not an EXACTMATCH". HPC received "OSS Gateway: Error caught by data source Message[0] OSS Gateway: Error caught by data source Message[0] ERROR:No exact match was found for the address provided.". 02/04/02: Qwest: This was fixed as part of the errors analysis that Qwest has performed in recent days. The data document to be published this evening contains the updated error messages, including the messages received for these transactions. 02/05/02 Qwest: Distributed SATE Data Document 9.0 v04 on the evening of 2/4/2002 that corrected this Data Document error. 02/07/02: HP: Retested and received the expected response.
9021	Transaction Test	Phase 1 Regression testing of the 9.0 Data Document using the scenarios for FAQ7 and FAQ8 did not return the expected responses.	02/01/02: HP submitted the transaction and received the expected response. The one exception that should be noted is the format of the ECCKT on the first line. The Data Document indicates "5094875000", HP received "509 487-5000". 02/07/02: Qwest: Distributed the SATE Data Document 9.0 v05 and advised to retest write-ups from 02/04/2002. 02/07/02: HP: Retested and received the same response containing: "509 487-5000". The Data Document indicates "5094875000". 02/13/02: Qwest: FAQ7 and FAQ8 will be fixed in the 9.05 data document. 02/15/02: HP: This has been corrected in the 9.05 data document.
9022	Transaction Test	Phase 3 Progression testing of the 9.0 Data Document	02/18/02: HP submitted request and did not receive the expected response. Sent

Candidate Sequence Number	Domain	Candidate Issue Statement	Comments
		using the scenarios for LQQ1, LQQ2 and LQQ5 did not return the expected responses.	the same scenario that was successful during the first transaction test, yet this test returned an error: "Invalid combination of MS, TOS, NC, and NCI". This is a new error. 02/21/02: Qwest: LQQ1, 2, 5: CR 39043 has been entered to resolve this issue. 02/25/02: Qwest: Event Notification 5864384. Description of Trouble: In the developer worksheet for Loop Qualification Query, LQQ-10, NCI, the valid values are shown as 02QB5.00A, 02QB5.01A, 02QB5.00C, and 02QB5.01C. These values are incorrect, and as a result the error "Invalid combination of MS, TOS, NC and NCI" is issued on an Unbundled ADSL LQQ in IMA EDI Release 9.0. Work Around: LQQ-10, NCI should be populated with 02QB9.00A, 02QB9.01A, 02QB9.00C, or 02QB9.01C. 02/27/02: HP: Changed the NCI code and received the expected results.
9023	Transaction Test	Phase 1 Progression testing of the 9.0 Data Document using the scenarios for LQQ2, LQQ4 and LQQ6 did not return the expected responses.	02/04/02: HP submitted request and did not receive the expected response. Received the error "OSS Gateway: Error caught by data source Message[0] ERROR No information was found for this address." 02/07/02: Qwest: Advised that the query may not be valid. 02/08/02: HP: Corrected query and resubmitted. Received errors: "STATE required when TNADDRCKTIND is A" and "CALA or ZIP required". Both STATE and CALA were transmitted on the query. 02/08/02: Qwest: Indicated that the PO1 loops must follow the sequence outlined in the EDI Mapping Example. 02/08/02: HP: Updated map to move the PO1-ADSL loop to write after ADDRQ. Resent INQNUM 020208151764. Received the same error. 02/08/02: Qwest: Will continue to research.

Candidate Sequence Number	Domain	Candidate Issue Statement	Comments
			02/11/02: Qwest: Notified HP that CR number 37384 has been opened to address this error. 02/12/02: Qwest: Notified HP that CR number 37384 will be deployed this evening and HP can test the transaction tomorrow. 02/13/02: HP: Retested (INQNUM=020213151780) and received expected response.
9024	Transaction Test	Phase 3 Progression testing of the 9.0 Data Document using the scenarios for LQQ3 and LQQ4 did not return the expected responses.	02/18/02: HP submitted request and received the expected response except that the values received for LLG do not match the data document. Per the EDI *mapping example in* Chapter 14 of the IMA 9.0 Disclosure on page 12, LLG is mapped to the MEA03 data field. The returned MEA03 value for the 5 LLG values was '6.6' and 4 each of '0' in the response. The SATE 9.04 Data Document incorrectly depicts the Gauge Code and Loop Length (which is mapped to MEA04 per the mapping example) as being the data values for LLG. The Gauge Code and Loop Length are not identified as data fields in Appendix A of the IMA 9.0 Disclosure. This is not a new error as it was present in the first transaction test and HP did not identify the error. 02/25/02: HP: HP has revisited this issue. The Data Document indicates that an LLG = 17G0.0000kft. A value of 17 is not listed in the Data Dictionary. Since the LLG can repeat 5 times this may be an oversight in the Data Dictionary. The Data Document depicts the Measurement Value MEA03
9025	Transaction Test	Phase 1 Progression testing of the 9.0 Data Document using the scenarios for RLDQ7, RLDQ8, RLDQ19 and RLDQ23 did not return the expected responses.	02/04/02: HP submitted request and received the expected response. One item is worth noting. The Data Document indicates that a BLDG A will be returned. HP did not receive that in the response. 02/07/02: Qwest: Distributed the SATE Data Document 9.0 v05. 02/07/02: HP: Retested and received expected response.

Candidate Sequence Number	Domain	Candidate Issue Statement	Comments
			02/08/02: Qwest: CR 36933 has been entered to return the BLDG data. This is scheduled to be deployed this weekend and to be available to test on Monday.
9026	Transaction Test	Phase 1 Regression testing of the 9.0 Data Document using the scenario for TNAQ2 did not return the expected response.	02/01/02: HP submitted the transaction and received the expected response. One item is worth noting. The CUSTOMIND was a blank in the third phone number. This created a syntactically incorrect response from Qwest. The Business Rules indicate that acceptable values are Y and blank. However the field, in EDI, is mapped to a PID08. The PID08 is an ID table, therefore a blank is not an acceptable response. The business rules indicate that the CUSTOMIND is returned if the TNRES is present. HP received the TNRES. The segment(s) in question are listed below. SLN|MIXED|3|A|1|EA SI|TI|RV|299-901-4570 PID|X||TI|CUSTOMIND|||SO-RSQ| 02/06/02: Qwest: Advised that the fix for this will be deployed on 02/07/2002 and this can be re-tested on 02/08/2002. 02/08/02: HP: Retested (INQNUM=020208151748) and received the same situation where the PID08 value returned a blank: PID|X||TI|CUSTOMIND|||SO-RSQ| SLN|MIXED|3|A|1|EA SI|TI|RV|299-901-6259 02/11/02: Qwest: Notified HP that the fix was deployed over the weekend. 02/
9027	Transaction Test	Phase 1 Regression testing of the 9.0 Data Document using the scenario for TNAQ3 did not return the expected response.	02/01/02: HP submitted the transaction and received the expected response. One item is worth noting. The Data Document indicates that one error message will be returned, HP received the one noted on the data document, and one additional one. The second error message was "OSS Gateway: Verify input. No available numbers satisfy all the valid input parameters No Telephone Numbers available for this query".

Candidate Sequence Number	Domain	Candidate Issue Statement	Comments
			02/04/02: Qwest: This was fixed as part of the errors analysis that Qwest has performed in recent days. The data document to be published this evening contains the updated error messages, including the messages received for these transactions. 02/05/02: Qwest: Distributed SATE Data Document 9.0 v04 on the evening of 2/4/2002 that corrected this Data Document error. 02/07/02: HP: Retested and received the expected response.
9028		Phase 2 Regression testing of the 9.0 Data Document using the scenario for TNAQ3 did not return the expected response.	02/14/02: HP submitted query and received the expected error message, but also received the following error message. This message is not documented in Errors List: "TNAEASNUM 900«ERRMESG«Nearby telephone numbers (NTNUM),easy numbers (ECATEG),easy word numbers (EWORD), and consecutive blocks (CBLOCK)are mutually exclusive. Cannot request more than one of these types of numbers". The conflict with this error message is that the EDI mapping example on page 11 of chapter 9 of the IMA 9.0 Disclosure appears to require NTNUM to be mapped in order to transmit the value of ECATEG or EWORD. 02/25/02: Qwest: The SI segment where NTNUM, ECATEG, EDWORD and EJUST is horizontal SI arrangement. The order in how these fields come doesn't really matter. It doesn't force you to send the NTUNM in order to send ECATEG. For example, you can send the transactions this way SI|TI|RQ|ECATEG|ZZ|EWORD. This will be a valid transaction to send. 02/26/02: HP: The Disclosure Document does not indicate that the paired elements of the SI segment can be sent in any order. Since the TNNUM is not used if the ECATEG or EWORD is used, it may be better to depict them on

Candidate Sequence Number	Domain	Candidate Issue Statement	Comments
			separate SI segments. 02/26/02: HP: Corrected map, sent query and received the expected results.
9029	Transaction Test	Phase 1 - Regression testing of the 9.0 Data Document using the scenario for TNAQ4 did not return the expected response.	02/01/02: HP submitted the transaction and received the expected response. One item is worth noting. The Data Document indicates that one error message will be returned, HP received the one noted on the data document, and one additional one. The second error message was "OSS Gateway: System problem encountered. Call UHD/OSS No Telephone Numbers available for this query". 02/04/02: Qwest: This was fixed as part of the errors analysis that Qwest has performed in recent days. The data document to be published this evening contains the updated error messages, including the messages received for these transactions. 02/05/02: Qwest: Distributed SATE Data Document 9.0 v04 on the evening of 2/4/2002 that corrected this Data Document error. 02/07/02: HP retested and received the expected response.
9030	Transaction Test	Phase 1 Progression testing of the 9.0 Data Document using the scenario for UDLNP1 did not return the expected response.	02/05/02: HP submitted LSR with TID=151692 and received FATAL error "Could not check supplemental (Unknown product type)" 02/06/02: Qwest: Advised that the fix for this 860 problem is completed. 02/07/02: HP: Retested with TID=151712, ver=04. Requested and received the 855SU, 865FOC, 865JEOP and 865CN.

For any 'Closed' candidate issues, HP has explained the reason for a candidate issue being closed above and in the Internal Issue Tracking Log.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into: US WEST COMMUNICATIONS, INC.'s Compliance with Section 271 of the Telecommunications Act of 1996	Docket No. UT 003022 Volume LI Pages 7452 to 7528
In the Matter of: US WEST COMMUNICATIONS, INC.'s Statement of Generally Available Terms Pursuant to Section 252(f) of the Telecommunications Act of 1996	Docket No. UT 003040 Volume LI Pages 7452 to 7528

A prehearing conference in the above matters was held on April 26, 2002, at 9:30 a.m., at 1300 South Evergreen Park Drive Southwest, Room 206, Olympia, Washington, before Administrative Law Judge ANN E. RENDAHL and CHAIRWOMAN MARILYN SHOWALTER and COMMISSIONER PATRICK J. OSHIE and COMMISSIONER RICHARD HEMSTAD.

The parties were present as follows:

QWEST CORPORATION, by LISA ANDERL via bridge lin, and ADAM SHERR, Attorneys at Law, 1600 Seventh Avenue, Suite 3206, Seattle,Washington 98191, Telephone (206) 345-1574, Fax (206) 343-4040, E-mail, landerl@qwest.com; and by ANDREW CRAIN, Attorney at Law, 1801 California Street, Suite 1710, Denver, Colorado 80202.

Deborah L. Cook
Court Reporter

long do we need to look at it, and here's putting my advocate's hat on, I would say I want a good six months. But recognizing the time frame in which we are operating, and the issuance of the final report and the desire to wrap all of this proceeding up, I would say if we're talking just about product in process type issues, two to three months' worth of compliance.

I think systems is a little bit different, but if we're talking product in process, two to three months should provide us sufficient basis. Because there are a fair number of changes that are noticed, and that should give us a fair number of examples, or a number -- enough notices that we should have some confidence in it.

MR. HEMSTAD: With regard to your first example, in the partition ISDN loop for DSL where you needed the integrated pair gain, you contribute that to, again, simply internal error within US West -- or within Qwest, or I suppose you are not contributing anything to it. It's simply the fact that it occurred, and you weren't informed?

MS. DOBERNECK: I don't know whether it was sort of deliberate or evil in intention, no. From my perspective, and the documentation that I have seen, I think simply that it fell through the cracks, and it was

couple of things. One is the completion of the document itself, so documenting the CMP. And I think that's the first of the five or six items that the FCC has outlined as requirements that Ms. Singer Nelson presented in her opening.

Another component is that Qwest has adhered to the process over time. That part, I think, we will conclude. I think we can conclude the language in documenting the CMP by June sometime. And it's possible that it could be earlier. Whether that's sufficient time -- I mean, it depends on when we're done, and when they implement. And I have to kind of look at it overall to see if it has been adhered to for a reasonable period of time.

And Ms. Doberneck has mentioned two to three months. And I think that's what we would be looking for, some period of time once it's all done, and evidence to support that there is this adherence.

And I don't know if the ROC test -- I think the final final comes out at the end of May. How much of that will be captured by the ROC test -- I mean, we're hopeful that they are looking at all of those things and will report on it.

JUDGE RENDAHL: Because I am trying to get a sense of if we get to June, and AT&T says no, there's