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BEFORE THE ARIZONA CORPORATION COMMISSION

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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 REPLY COMMENTS REGARDING
STAFF'S REPORT AND RECOMMENDATION ON JULY 30-31 SUPPLEMENTAL
WORKSHOP (REPORT TWO)**

Qwest Corporation ("Qwest") hereby submits its reply to Eschelon's Comments Regarding Staff Second Report submitted by Eschelon Telecom, Inc. ("Eschelon") regarding the Arizona Corporation Commission (the "ACC" or "Commission") Staff's Final Report and Recommendation on the July 30-31 Supplemental Workshop (Report Two), dated June 20, 2003 (the "Report").

I. Introduction

As set forth in Qwest's Comments regarding the Report, Qwest has already taken action that satisfies many of Staff's recommendations. Further, Qwest disagrees with only four of Staff's thirty-six recommendations. Eschelon's Comments purport to seek clarification of several of Staff's recommendations. It is important to note that Qwest does not disagree with the aspects

of Staff's recommendations on which Eschelon has commented. Qwest addresses several of Eschelon's comments below.

II. Qwest's Reply Comments regarding Eschelon's Comments

A. Policy of Not Applying Rates in Interconnection Agreement -- Eschelon's DS1 Capable Loop Example

Eschelon raises several issues relating to Qwest's construction charges. Qwest agrees with Eschelon that these issues should be addressed and believes that the Phase III cost docket is the appropriate forum. However, Qwest does not agree that its policy should be suspended in the interim. Contrary to Eschelon's suggestion, Qwest will agree to refund fees pursuant to a true-up, if necessary, based on the resolution of the issue. Therefore, no suspension of Qwest's construction policy is warranted.

B. UNE-P Feature Availability

Qwest has already taken appropriate steps to ensure that information regarding which features are and are not available with a product, as well as Universal Service Ordering Codes ("USOCs") for those features, is available and is presented in a more logical and readily accessible manner.

While it is true that Qwest has removed the list of unavailable features from its wholesale web site, Eschelon is mistaken both in contending that the necessary information is now not readily available and in implying that CLECs were not notified of this change through Qwest's Change Management Process ("CMP"). Contrary to Eschelon's suggestion, the CLEC community was notified of the PCAT change through an appropriate CMP notification on May 22, 2003. That notice, number PROD.05.22.03.F.03410.UNE_P_UBS_Updates, clearly stated that the UNE-P PCAT "has been updated to remove the 'USOCs not Available with UNE-P' download that has been replaced with the UNE-P Features Matrix providing hyperlinks to

feature information and availability." This Level 1 change was posted to the UNE-P General Information PCAT May 23, 2003.

Thus, while it is true that Qwest removed the list of unavailable feature availability with UNE-P, that list was replaced with the UNE-P Features Matrix. This matrix is easily accessible on Qwest's wholesale web site. A CLEC looking for information regarding the feature availability for UNE-P will see a link to the UNE-P Features matrix page in the third paragraph of UNE-P General Information PCAT.¹ The matrix lists UNE-P products and indicates whether the listed features are standard, optional, or not available for each product. The listed products include links to the product description pages for each product, including extensive language descriptions, information regarding availability, and a table of relevant USOCs.

The matrix thus affirmatively sets forth which features are available with each product, along with links to extensive language descriptions and USOCs. The matrix also indicates by omission those features that are not available: if a feature is not listed, it is not available.

Therefore, Qwest has already addressed Eschelon's concerns by providing information regarding the features that are and are not available with a product, along with language descriptions of the products and USOCs, in a very logical and readily accessible manner.

C. Training -- Customer Relationship Surveys

Qwest disagrees with Eschelon's contention that Staff's recommendation that Qwest should "send out relationship management surveys to CLECs annually, as part of its CMP process," should be modified to require Qwest to subject development of the survey to the CMP process.

¹ This page is found at the following URL: <http://www.qwest.com/wholesale/pcat/unep.html>

Unlike the business processes that are jointly developed through the CMP process, it would not be appropriate to negotiate the contents or design of a survey. It would be entirely inappropriate for CLECs to direct the design of the survey or the questions that should be asked. Instead, it would be more appropriate for the survey design to be directed by an independent third party with expertise in surveying to ensure the accuracy of the results. Accordingly, Qwest engaged an independent third party vendor to perform a survey of all of its customers, including retail, small and large business, and wholesale customers. As part of this process, Qwest developed an extensive list of customer contacts for all wholesale customers, including IXC, wireless providers, CLECs, and resellers. The list is not limited to those CLECs that participate in CMP or to the CLEC representatives that participate in CMP. Thus, the list includes representatives from companies that do not participate in CMP. For those CLECs that do participate in CMP, the list includes appropriate customer contacts, even if those individuals do not personally participate in CMP. Qwest sent letters to its customers advising them that they may be contacted to participate in the survey. Indeed, as Eschelon noted in its Comments, Eschelon was contacted regarding the survey. The vendor obtained information from Qwest regarding Qwest's processes focusing on four areas -- general relationship with Qwest, provisioning, repair, and billing -- and developed the questions to be asked. The vendor then compiled a random, statistically valid sample of contacts from the list, contacted them, and asked questions focusing on those four areas.

Qwest will continue to work with its vendor and all of its customers, including its wholesale customers, to ensure that the survey addresses customer concerns and, more importantly, that those concerns are appropriately resolved. However, it would be inappropriate to compromise the survey process by subjecting it to negotiation through the CMP process.

D. Unannounced Dispatches

On this issue, Eschelon simply requests that Qwest make a minor adjustment to better accommodate the needs of CLECs by adding links in the relevant portions of the PCAT directing users to the matrix that describes the process for non-emergency maintenance visits to CLEC end-user premises. Qwest agrees and will make the matrix available in the maintenance and repair PCAT as a downloadable document.

E. Maintenance and Repair -- Reciprocity

Qwest agrees with Staff on this issue. SGAT section 12.3.4 describes the responsibilities and applicable charges for trouble isolation and trouble clearing.

Qwest disagrees with Eschelon's implication that reciprocity for repair isolation is a new or distinct issue that has not been addressed. The issue of reciprocal charges for repair was discussed in the General Terms and Conditions and Unbundled Loop workshops, and was not identified as an impasse issue in either proceeding. Discussions among the parties during these workshops resulted in agreement to the language that now appears in SGAT section 12.3.4. Specifically, the parties in Arizona agreed to import the Colorado Loop Workshop consensus Maintenance and Repair language regarding trouble isolation charges, acknowledging that it specifically excludes a requirement for reciprocity.²

Qwest also agrees with Staff that Eschelon has not provided any new data that would merit re-opening this consensus item.

² See, e.g., Workshop 6 Transcript Vol. V (June 14, 2001), ACC Docket No. T-00000A-97-0238, at 944-946, 1020-1023.

F. Loss and Completion Reports

With regard to Qwest's loss and completion reports, Eschelon asks the Commission to "require Qwest (for all of the issues referred to CMP) to advise the Commission when the process is agreed upon and implemented." The only rationale for this request appears to be Eschelon's concern that Staff's Report refers only to a single change request ("CR") relating to the loss and completion report, and does not mention action items opened through the CMP process. No such reporting requirement is necessary or appropriate.

Qwest fully intends to process all CRs and action items regarding this issue in accordance with established processes. Information regarding the status of all CRs is readily available in the interactive reports on Qwest's wholesale web site.³ Similarly, information regarding all action items is available in several forms on Qwest's wholesale web site. Such information is tracked in meeting minutes,⁴ in the interactive reports for system and product/process CRs,⁵ and in attachments to the meeting distribution packets.⁶ Because the information Eschelon refers to is publicly available to any interested person, no further reporting requirements are warranted.

III. Conclusion

Qwest has agreed to take the actions Staff recommends regarding the issues Eschelon raises in its comments. In addition, Qwest has agreed with some of Eschelon's concerns, as set forth above. Qwest requests that the Commission adopt Staff's recommendations with respect to

³ Links to these reports can be found at the following URL:
<http://www.qwest.com/wholesale/cmp/changerequest.html>

⁴ Links to the team meeting minutes can be found at the following URL:
<http://www.qwest.com/wholesale/cmp/teammeetings.html>

⁵ Links to these reports can be found at the following URL:
<http://www.qwest.com/wholesale/cmp/changerequest.html>

⁶ Links to these distribution packages can be found at the following URL:
<http://www.qwest.com/wholesale/cmp/teammeetings.html>

the issues on which Eschelon has commented, with the modifications Qwest has described above.

RESPECTFULLY SUBMITTED this 25th day of July, 2003.

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