**Qwest**
421 Southwest Oak Street
Suite 810
Portland, Oregon 97204
Telephone: 503-242-5420
Facsimile: 503-242-8589
e-mail: carla.butler@qwest.com

**Carla M. Butler**
Sr. Paralegal

March 23, 2005

Frances Nichols Anglin
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: ARB 584

Dear Ms. Nichols Anglin:

Enclosed for filing please find an original and (5) copies of Qwest Corporation's Rebuttal Testimony of William Easton, Karen Stewart, Renée Albersheim and Michael Norman, along with a certificate of service. Also enclosed please find an Exhibit Index, which is provided for your ease of reference.

If you have any question, please do not hesitate to give me a call.

Sincerely,

Carla M. Butler

CMB:
Enclosure
L:\Oregon\Executive\Duarte\ARB 584 (Covad)\PUC Transmittal Ltr 3-21-05.doc

Qwest

# EXHIBIT INDEX

ARB 584

EXHIBIT

| | |
|---|---|
| Qwest/7 | William Easton Rebuttal Testimony |
| Qwest/8 | William Easton Rebuttal Testimony Exhibit |
| Qwest/9 | Karen Stewart Rebuttal Testimony |
| Qwest/10 | NO DOCUMENTS |
| Qwest/11 | Michael Norman Rebuttal Testimony (CONFIDENTIAL pages 8-9) |
| Qwest/12 | Renée Albersheim Rebuttal Testimony |
| Qwest/13 | Minnesota Joint Trial Report dated November 22, 1999 |
| Qwest/14 | Provisioning System Flow for Non-Design Products |
| Qwest/15 | Open System CR SCR102102-1X Detail |
| Qwest/16 | Operational Impact Review (1/21/00 minutes) |
| Qwest/17 | Firm Order Manager FOC Review (CONFIDENTIAL) |
| Qwest/18 | Sample Covad Bill Excerpt (CONFIDENTIAL) |
| Qwest/19 | Billing Information – Customer Records and Information System (CRIS) |
| Qwest/20 | Change Management Process (CMP) (CR SCR100104-01) |
| Qwest/21 | Memo to Liz Balvin from Connie Winston dated February 24, 2005 |
| Qwest/22 | Geographic Deaveraging – General Information |
| Qwest/23 | MSA & Geographic Zone Data for Pricing, Density, and Maintenance and Repair Intervals |
| Qwest/24 | Deaveraged Rate Zone by Wire Center - Oregon |
| Qwest/25 | Archived System CR SCR051403-2X |

Qwest/7
Easton/i

**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

**ARB 584**

**IN THE MATTER OF THE PETITION OF DEICA COMMUNICATIONS, INC. dba COVAD COMMUNICATIONS COMPANY FOR ARBITRATION OF AN INTERCONNECTION AGREEMENT WITH QWEST CORPORATION**

# REBUTTAL TESTIMONY OF WILLIAM R. EASTON

**ON BEHALF OF**

**QWEST CORPORATION**

**PAYMENT ISSUES**

**(Disputed Issue Nos. 8-1, 8-2, and 8-3)**

**MARCH 23, 2005**

# TABLE OF CONTENTS

**PAGE**

**I. IDENTIFICATION OF WITNESS..... 1**

**II. PURPOSE OF TESTIMONY..... 1**

**III. RESPONSE TO COVAD'S PAYMENT ISSUE TESTIMONY ..... 2**

**IV. SUMMARY/CONCLUSION..... 17**

## I. IDENTIFICATION OF WITNESS

**Q. PLEASE STATE YOUR NAME, OCCUPATION AND BUSINESS ADDRESS.**

A. My name is William R. Easton. My business address is 1600 7th Avenue, Seattle Washington. I am employed as Director – Wholesale Advocacy. I am testifying on behalf of Qwest Corporation ("Qwest").

**Q. ARE YOU THE SAME WILLIAM EASTON WHO FILED DIRECT TESTIMONY IN THIS PROCEEDING?**

A. Yes.

## II. PURPOSE OF TESTIMONY

**Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

A. The purpose of my testimony is to respond to the direct testimony of Elizabeth Balvin relating to payment for services and the amount of time that Qwest must wait before Qwest can discontinue taking orders or disconnect services due to Covad's non-payment for services. These are Disputed Issues 8-1 (Due Dates for Amounts Payable), 8-2 (Timing for Discontinuing Orders), and 8-3 (Timing for Disconnecting Services) in this arbitration proceeding.

## III. RESPONSE TO COVAD'S PAYMENT ISSUE TESTIMONY

**Q. MS. BALVIN ARGUES AT PAGE 22 OF HER TESTIMONY THAT THE 30-DAY INDUSTRY PAYMENT STANDARD REALLY RELATES TO ACCESS PRODUCTS WHERE THERE ARE INDUSTRY STANDARDS FOR BILLING FORMATS, AND THAT THIS SAME STANDARD SHOULD NOT APPLY TO THE WHOLESALE PRODUCTS WE ARE CONCERNED WITH HERE. DO YOU AGREE?**

A. No. First, Qwest's bill formats for wholesale products are well established. Covad has been receiving an ASCII formatted electronic bill from Qwest for years and, as a result, Covad has already had sufficient time to work out its internal processing of these bills. Qwest also offers an industry standard EDI-formatted bill should Covad prefer that format.

Second, Ms Balvin suggests that 30 days is an acceptable timeframe for access services billing since access services are long-established products. However, even in 1984, when access service billing was brand new, and both the billing companies and the recipient companies were dealing with brand new systems and processes to deal with the new services, 30 days was still an acceptable timeframe. Attached as Exhibit Qwest/8, Easton/1 is a page from Pacific Northwest Bell's 1/1/84 FCC Access tariff, which specifies that bills "are due 31 days (payment date) after the bill day or by the next bill date (i.e., same date in the following month as the bill date) whichever is the shortest interval …." Thirty days should be acceptable here too. As I discuss in my direct testimony, there is a

30-day payment period in the parties' current ICA, in Qwest's Oregon SGAT, in numerous ICAs with other CLECs, in Qwest's FCC access tariff (FCC No. 1) and in the Qwest Oregon Access Service Tariff. Furthermore, in the Commercial Line Sharing Agreement that Qwest and Covad entered into in April of 2004, Covad agreed to a 30-day payment term.

**Q. WOULD CHANGING THE DEADLINE FOR PAYING THE BILL TO 45 DAYS ALLEVIATE THE BILLING PROCESS PROBLEMS THAT COVAD ALLEGES?**

A. No. From a process perspective, Qwest would continue to issue bills on a monthly cycle to Covad. Taking 45 days to verify one month's bill, when the next month's bill will be arriving in 30 days, would serve only to put the bill verification process out of synch with the bill payment process. Indeed, under Covad's proposed process, and based upon its claim that it requires 45 days to validate and pay each month's bill, Covad would only have 45 days to review its first month's bill, and would thereafter fall behind in its bill validation, since subsequent bills are generated every 30 days.

**Q. MS. BALVIN DEVOTES A SIGNIFICANT PORTION OF HER TESTIMONY TO ALLEGED BILLING ERRORS AND DEFICIENCIES. ARE THE DISPUTED PORTIONS OF SECTION 5.4 OF THE INTERCONNECTION AGREEMENT THE APPROPRIATE PLACE TO ADDRESS THESE ISSUES?**

A. No. The section of the agreement that is in dispute in this arbitration is titled "Payment," and addresses the obligations of the billed party to make payments in a timely manner, and the actions the billing party may take should payments not be timely. Covad initially seemed to recognize this distinction, because the only language in dispute when Covad filed its Petition for Arbitration was the number of days required to pay a bill and the number of days before Qwest could pursue its remedies in the event of non-payment. However, through this arbitration process, and as is reflected in its newly-proposed language, Covad seeks to insert new issues into the arbitration proceeding (i.e. the bill format) that were not part of the negotiations, were not included in its Petition and that are not appropriately part of this arbitration process. A Section 252 arbitration proceeding is limited to disputes regarding the *language* of the parties' interconnection agreement. An arbitration is not the proper forum for determining process changes that will affect the entire CLEC community.

Billing format issues, such as those that Ms. Balvin raises, should be addressed through the Change Management Process (CMP), the terms and provisions of which are contained in the undisputed portions of the interconnection agreement. Exhibit G was developed by industry participants through the 271 process and sets out in great detail the purpose and rules governing CMP. CMP was designed specifically to address process and system issues and CLECs and Qwest use it for that purpose. In fact, Covad invoked and is currently following the CMP process to address its claimed need for a circuit ID number on the Qwest bill. Ms.

Albersheim's testimony will address issues that Ms. Balvin raises regarding the CMP process and explain how CMP handles process and systems changes.

**Q. IN HER TESTIMONY, MS. BALVIN ARGUES THAT BILL ANALYSIS IS COMPLICATED BY THE FACT THAT QWEST FAILS TO PROVIDE "CIRCUIT ID" INFORMATION ON BILLS FOR LINE SHARING SERVICES. PLEASE COMMENT.**

A. The real issue here is not that the circuit identification field ("circuit ID") is "missing," as Covad describes it, but rather that the circuit ID is not the relevant identifier for line sharing services. Qwest does provide the circuit identification field on bills when the circuit ID is the relevant identifier for a particular charge. For example, bills for Unbundled Loops, Private Lines and similar circuits do contain the circuit ID. However, most telecommunication services do not use the circuit ID as an identifier.

In the case of line sharing, for the reasons discussed in the testimony of Ms. Albersheim, the relevant identifier is not the circuit ID. To identify line sharing services, Qwest assigns a unique identification number to the loop over which Covad is providing line sharing. Ms. Albersheim's testimony, which discusses the technical aspects of this issue, explains in detail that Qwest provides this unique identification number to Covad as a part of the Firm Order Confirmation (FOC) that is issued in the service provisioning process, just as circuit IDs are provided via the FOC for those products that are circuit-based. As Ms. Albersheim explains, this unique identification number provides Covad with a

direct and efficient means of verifying that the service for which Covad has been billed is the service that Covad ordered. This identification number is also a part of the Customer Service Record (CSR) that Covad may readily access electronically. This process for billing line sharing, its rationale, and the ready means by which line sharing bills may be validated, have been explained numerous times to Covad by Qwest billing personnel.

**Q. HAS COVAD RAISED THIS CIRCUIT IDENTIFICATION ISSUE IN THE CMP PROCESS?**

A. Yes. However, Covad did not raise this as a billing issue in CMP until October 2004, nearly two years after the parties began negotiation of their interconnection agreement, and five months after filing its direct testimony in Colorado, the first state to conduct an arbitration proceeding.

**Q. ON PAGE 10 OF HER DIRECT TESTIMONY, MS. BALVIN STATES THAT IN THE ABSENCE OF A CIRCUIT ID NUMBER, COVAD IS "UTTERLY UNABLE" TO CONFIRM WHETHER QWEST IS BILLING COVAD FOR A LOOP IT HAS ORDERED. PLEASE COMMENT.**

A. This is simply not so. As I just discussed, Qwest does provide Covad with information that allows it to track line sharing orders and validate line sharing bills. Covad is unwilling to modify its systems to utilize this information and instead asks that it be treated differently than all other CLECs. This would require Qwest to modify its systems, at an extraordinary cost, and would allow payment terms different than those that are followed by all others.

**Q. PLEASE PROVIDE SOME BACKGROUND REGARDING THE LINE SHARING PRODUCT.**

A. Several years before the FCC required line sharing, Qwest was the first ILEC in the country to implement this product, and did so in Minnesota in early 2000. In leading the country with a line sharing product, Qwest and the CLECs, including Covad, engaged in discussions to make the product available as quickly as possible. At the CLECs' request, Qwest designed line sharing using the non-design provisioning flow process, a process which does not associate circuit ID with the services. Qwest and the CLECs mutually agreed to that implementation. The process has been in effect since line sharing began, and Covad has received bills in essentially the same format since then. It was not until after this arbitration began that Covad first raised the issue of lack of circuit IDs on bills, which leads one to wonder how serious a billing concern this issue actually is, as opposed to simply an excuse to gain the float of a later payment date.

**Q. MS. BALVIN STATES THAT THE LACK OF CIRCUIT ID IS ONLY AN ISSUE WITH QWEST, AND IMPLIES THAT QWEST IS OUT OF STEP WITH OTHER ILECS. PLEASE COMMENT.**

A. I cannot speak to what other ILECs may do, but I do know that other CLECs in the Qwest region have been able to work with Qwest line sharing bills. Those other CLECs have apparently developed processes so that they can adequately track orders and validate billing using the information that Qwest provides. Ms. Albersheim's testimony will discuss this issue in further detail.

**Q. MS. BALVIN ALSO STATES ON PAGE 11 OF HER TESTIMONY THAT USOCS ARE NOT ALWAYS PROVIDED ON BILLS. IS THE LACK OF USOCS A COMMON OCCURRENCE?**

No. Ms. Balvin is apparently referring to a system problem that Qwest had in its Western CRIS billing system which prevented the USOCs for some non-recurring charges from appearing on the bills. Although a plain description of the non-recurring charge was always contained on the Western region bills (e.g. "ONE TIME CHARGE FOR INSTALLATION/CHANGE" or "BASIC INSTALLATION ON ADDITIONAL LOOPS"), Qwest has now modified the system to include the USOC as well, a fact that Ms. Balvin finally acknowledges on page 12 of her testimony.

**Q. ON PAGE 16, MS. BALVIN CITES THE USE OF A COMMON USOC FOR MULTIPLE RATE ZONES AS A FACTOR COMPLICATING BILL REVIEW. DO YOU AGREE?**

A. No. The zone information is implicitly on the bill because the monthly rate being charged is directly related to the particular zone for a state. Although Ms. Balvin does not explain that Covad may use the USOC to confirm that the rate is correct, the presence of the common USOC and the specific rate on the bill allow for a comparison of the rate with the allowable zone rates for that USOC. This comparison is easy to mechanize. Further, Qwest's use of the same USOC for multiple rate zones means that Covad has fewer USOCs to keep track of, thereby simplifying bill validation. As Ms. Balvin acknowledges, there are only three

different zones to be concerned with in Oregon. If Covad truly has "state of the art" billing validation software, as it has claimed in other proceedings, it should be easily able to mechanically validate the rates for the different rate zones. Ms. Albersheim's testimony will discuss the technical aspects of the way in which Qwest provides zone information, and how that can be used by Covad for bill validation.

**Q. PLEASE COMMENT ON MS. BALVIN'S STATEMENT ON PAGE 16 THAT ALL DISCONNECTS MUST BE RESEARCHED MANUALLY AND INDIVIDUALLY TO MAKE SURE THAT THE DATE ON THE DISCONNECT IS CORRECT.**

A. It may be that Covad chooses to validate disconnects manually. This process, however, is easily mechanized. Since Qwest provides the disconnect date on all of its electronic bills, Covad must simply build a mechanical routine to compare that disconnect date to the disconnect date expected according to Covad's records. The fact that the CLEC industry by and large operates on the commercially-standard thirty day payment due date belies Covad's argument that this and other bill validation steps cannot be reasonably accomplished within thirty days.

**Q. ON PAGE 12 OF HER TESTIMONY, MS. BALVIN DISCUSSES WHY COVAD BELIEVES MORE TIME IS REQUIRED TO PAY BILLS WHICH CONTAIN NEW SERVICES. PLEASE COMMENT.**

A. As I noted in my direct testimony, Qwest is opposed to the Covad proposal for a number of reasons. First, treating new services in the manner that Covad proposes would create an administrative and systems nightmare, and would

require a reworking of standardized billing and collections practices to allow for exceptions based on whether services have been ordered previously, and a corresponding rewriting of systems logic to accommodate the changes.

Second, Covad's definition of new services is overly broad. Under the Covad definition, a CLEC ordering a slightly different variation of a service that it had been ordering for some time would be allowed extra time to pay its bills for the next 12 months, even though there is no difference in the two services from a bill presentation and billing validation perspective. The exception treatment that this language affords makes the system far too susceptible to gaming.

Finally, Covad overstates the degree to which accommodations are required on its part when new services are ordered. These new services will be billed by the same billing systems that Covad has been working with since it began doing business with Qwest in 1998, and in most cases, the new services will require little, if any, accommodation from a billing validation perspective.

**Q. DO YOU AGREE WITH MS. BALVIN'S ASSERTION AT PAGE 6 THAT QWEST HAS NO INCENTIVE TO FIX BILLING DEFICIENCIES GIVEN ITS PROPOSED TIME FRAMES?**

A. No. First of all, Qwest does not agree that its bills are deficient. As a part of the section 271 approval process, there was an extensive review of Qwest's wholesale billing processes and, based upon this review, the FCC concluded that Qwest's billing processes satisfied the section 271 "checklist" requirements. It should be

noted, however, that Qwest has every incentive to provide accurate bills, by virtue of the fact that the parties operate under the Qwest Performance Assurance Plan (QPAP), which provides for payments to Covad and other CLECs for inaccurate billing. Performance indicator BI-3A is calculated each month to determine billing accuracy.

**Q. ARE THESE QPAP PAYMENTS FOR BILLING INACCURACY OVER AND ABOVE THE INTERCONNECTION AGREEMENT PROVISIONS FOR DISPUTED AMOUNTS?**

A. Yes. For example, in cases of overbilling, Covad would receive credit for the amount of the overbilling, and any associated interest, as well as the applicable payment under the QPAP. Given the dollar amounts at stake, Qwest clearly has every incentive to bill as accurately as possible.

**Q. ON PAGE 21 OF HER DIRECT TESTIMONY, MS. BALVIN ASSERTS THAT "QWEST APPARENTLY NOW IS ATTEMPTING TO MODIFY ITS PAP OBLIGATIONS." HOW DO YOU RESPOND?**

A. Ms. Balvin is apparently referring to Qwest's plan to not renew the Long Term PID Administration (LPTA) process after its initial term ended. Contrary to Ms. Balvin's assertions, however, the LPTA was never an obligation under the Performance Assurance Plan. The LPTA was a voluntarily agreed-upon approach by Qwest, CLECs, test vendors and state commission Staffs during the section 271 process to address performance measurements by which Qwest would demonstrate that it met its non-discrimination obligations under the Telecommunications Act of

1996. Based upon its experience, Qwest believes that discussions on performance measurement issues will be more productive in a less formal business setting. Accordingly, going forward, Qwest has established a PID (Performance Indicator Definitions) modifications process whereby CLECs can identify and address performance-related issues. Contrary to Ms. Balvin's claims, this change does not modify Qwest's PAP obligations.

**Q. ON PAGE 17 OF HER TESTIMONY, MS. BALVIN ARGUES THAT QWEST WANTS MONTHLY PAYMENT ON OR BEFORE IT EVEN PROVIDES A FULL MONTH'S SERVICE. PLEASE COMMENT.**

A. Ms. Balvin is mistaken. First, all non-recurring charges and usage charges are billed in arrears. Second, while it is true that recurring charges are billed in advance, all service will have been provided by the time the bill is due 30 days after the invoice date. I also note that the billing of recurring charges in advance is the standard in the telecommunications industry and is, in fact, the practice that Covad follows in billing its own end user customers.

**Q. MS. BALVIN USES THE WORDS "DESTROY," "DEVASTATING" AND "FATAL" WHEN REFERING TO ACTIONS QWEST MAY TAKE IN CASES OF NON-PAYMENT. PLEASE COMMENT.**

A. Insisting that a customer pay for services provided, and disconnecting service if the customer has not paid the undisputed portion within three months of the invoice date, is hardly the draconian remedy that Covad attempts to make it out to be. Rather, this requirement should be viewed as a prudent business practice, one agreed to by

CLECs, including Covad, during the section 271 process, and one that Covad itself follows. Indeed, as I noted in my direct testimony, Covad's own policy does not require it to wait for any period past the 30-day due date before it disconnects services to its own end-user customers.

**Q. ON PAGE 19, MS. BALVIN STATES THAT COVAD IS CONCERNED ABOUT PROTECTING THE VIABILITY OF ITS BUSINESS IN THE EVENT OF A BILLING DISPUTE. PLEASE COMMENT.**

A. Covad's stated concern ignores the language of the agreement that states:

> 5.4.2 One Party may discontinue processing orders for the failure of the other Party to make full payment for the relevant services, ***less any disputed amount*** as provided for in Section 5.4.4 of this Agreement, for the relevant services provided under this Agreement within thirty (30) calendar Days following the payment due date. (Emphasis added.)

The language in the agreement clearly does not allow Qwest to discontinue taking orders or disconnect service for non-payment of disputed amounts. Therefore, the only time that Qwest can exercise its remedies is if Covad were to fail to pay the *undisputed* portion of its bills.

**Q. DO YOU AGREE WITH MS. BALVIN THAT QWEST HAS LITTLE TO NO EXPOSURE BECAUSE THERE ARE STILL DEADLINES THAT COVAD MUST MEET IN ORDER TO CONTINUE RECEIVING SERVICES FROM QWEST?**

A. No. Extending these deadlines clearly increase Qwest's exposure. The problem with extending the deadlines as Covad is proposing is that it allows a CLEC to

continue to incur months of additional liabilities when, due to the lack of payment, there is already an indication that Qwest may have difficulties collecting the monies it is owed. Under Covad's proposal, a CLEC would be allowed to incur an additional two months of liabilities after it had missed making a payment before Qwest could discontinue taking orders, and a third month before Qwest could disconnect the service.

Qwest's proposal provides a logical link between providing service and protecting against non-payment. Section 5.4.5 of the interconnection agreement, which deals with repeated delinquency, allows Qwest to secure a deposit approximating two months of billing. Then, in this disputed language, Qwest seeks to suspend orders once bills are thirty days past due. Since there is already one month of service on the past due bills, and another month of service passes before Qwest begins to suspend order activity, Qwest could begin suspension activity only after its protection, in the form of a two-month deposit, has been exhausted by two months of billing. Disconnection of service would not begin until Qwest was well beyond the financial protections that the deposit affords. Clearly, Qwest is being reasonable in its timeframes. To extend these timeframes beyond what they are in Qwest's proposed language, would leave Qwest with unjustified additional financial exposure.

**Q. BASED UPON RECENT EVENTS, ARE QWEST'S CONCERNS REGARDING THE EXTENDED TIME FRAMES THAT COVAD PROPOSES FOR THESE DISPUTED ISSUES HYPOTHETICAL?**

A. No. Over the past several years, Qwest has often found itself in the position of being left with large receivables when CLECs have exited the local exchange market and filed Chapter 7 bankruptcy. These recent experiences highlight the need for more, not less, stringent time frames for payment. The extended time frames that Covad proposes, especially considering the ability of other CLECs to opt-in to this agreement, would only unreasonably increase Qwest's financial exposure.

**Q. WHAT SUPPORT DOES COVAD PROVIDE FOR EXTENDING THE TIME FRAMES BEFORE QWEST CAN TAKE ACTION IN CASES OF NON-PAYMENT?**

A. The sole support that Covad provides is to argue that the non-payment remedies would have a devastating impact on its business, and therefore, Qwest should be required to delay taking action in cases of non-payment. The CLEC community agreed during the section 271 process that these standard non-payment remedies and time periods strike the proper balance between CLEC and Qwest interests. Qwest's proposed language carries forward that balance, whereas Covad's proposed language, attempts to shift, without justification, enormous additional risk to Qwest of never being paid for the services it provides.

**Q. ON PAGES 20 AND 21 OF HER TESTIMONY, MS. BALVIN REFERS TO AN ARIZONA DS3 UDIT BILLING ISSUE. PLEASE COMMENT.**

A. In her testimony, Ms. Balvin discusses Covad's billing dispute regarding DS3 UDIT. The DS3 UDIT rates were ordered by the Arizona Commission in Phase

II of the Wholesale Cost Docket in Decision No. 64922, dated June 12, 2002. However, contrary to Ms. Balvin's testimony, Qwest, in the Cost Docket proceeding, put forth its cost model, which included separate rates for entrance facilities and transport. The Commission rejected Qwest's cost model, and instead adopted the CLECs' HAI model. The HAI model that the Arizona Commission adopted combined the entrance facility and transport rate. Qwest implemented the ordered rate and therefore correctly billed the CLECs according to the ordered rate. This was not an error as Ms. Balvin states in her testimony and certainly does not support Covad's position that this was a bill dispute. Had Covad chosen to participate in the Cost Docket, it would have known that the HAI model combined the entrance facility and transport rate, and it could have raised its concerns in the proper forum. Thus, to imply that this was a billing dispute which supports its argument for extending the time to pay Qwest is totally unfounded. Qwest implemented and billed lawfully- ordered rates.

**Q. WAS COVAD ASSESSED LATE PAYMENT CHARGES ON THE BILLED AMOUNTS IT WITHHELD RELATED TO THE COST DOCKET ORDER?**

A. No. Qwest agreed that it would not hold CLECs in default for refusing to pay the ordered rate. Contrary to the suggestion in Ms. Balvin's testimony, there was no threat of Covad being disconnected or having other actions taken against it for its refusal to pay this charge.

**Q. DID QWEST DEMAND A DEPOSIT FROM COVAD AS A RESULT OF THESE WITHELD PAYMENT AMOUNTS?**

A. No.

**Q. DID QWEST STOP TAKING COVAD ORDERS OR DISCONNECT COVAD SERVICE AS A RESULT OF THE WITHELD AMOUNTS?**

A. No.

## IV. SUMMARY/CONCLUSION

**Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

A. The disputed portions of section 5.4 of the interconnection agreement have to do with the obligations of the billed party to make payments in a timely manner, and the actions the billing party may take to protect itself when payments are untimely. Qwest's proposed language and timeframes strike an appropriate balance between the needs of both parties, as evidenced by the fact that CLECs (including Covad) agreed to these timeframes and language during the section 271 workshops. In its testimony on payment issues, Covad ignores the notion of balance, and ignores the language in other, undisputed portions of the agreement that protects Covad's legitimate concerns, and instead, Covad focuses only on purported disadvantages to it. Covad also raises billing concerns here that are more appropriately addressed through the Change Management Process, the Performance Assurance Plan, or the other resources that Qwest has long made available to Covad through the designated Billing Service Delivery Coordinators and Service Managers. In the end, Covad offers no compelling reason why the payment due date under which the two parties have been operating since 1999,

and the other terms which all parties agreed to during the 271 workshops, should now be modified.

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes, it does.

ACCESS SERVICE

2. General Regulations

2.4 Payment Arrangements and Credit Allowances

2.4.1 Payment of Rates, Charges and Deposits

(B) (2) (Cont'd)

For bill days in January 1984, the bill will cover nonusage sensitive service charges for the ensuing billing period, the nonusage sensitive service charges for the period from January 1, 1984 thru the bill day, usage charges for the period from January 1, 1984 thru the bill day and any known adjustments for the calendar month of January 1984. Such bills are due as set forth in (3) following. If payment is not received on the payment date as set forth in (3) following in immediately available funds, a late payment penalty will apply as set forth in (3) following.

(3) All bills dated as set forth in (2) preceding for service, other than End User Service and Presubscription Service provided to the IC by the Telephone Company, are due 31 days (payment date) after the bill day or by the next bill date (i.e., same date in the following month as the bill date) whichever is the shortest interval, except as provided herein, and are payable in immediately available funds. If such payment date would cause payment to be due on a Saturday, Sunday or Holiday (i.e., New Year's Day, Indpendence Day, Labor Day, Thanksgiving Day, Christmas Day, the second Tuesday in November and a day when Washington's Birthday or Memorial Day or Columbus Day is legally observed) payment for such bills will be due from the IC as follows:

(a) If such payment date falls on a Sunday or on a Holiday which is observed on a Monday, the payment date shall be the first non-Holiday day following such Sunday or Holiday. If such payment date falls on a Saturday or on a Holiday which is observed on Tuesday, Wednesday, Thursday or Friday, the payment date shall be the last non-Holiday day preceding such Saturday or Holiday.

(b) Further, if any portion of the payment is received by the Telephone Company after the payment date as set forth in (a) preceding, or if any portion of the payment is received by the Telephone Company in funds which are not immediately available

**BEFORE THE PUBLIC UTILITY COMMISSION**

**OF OREGON**

**ARB 584**

IN THE MATTER OF COVAD
COMMUNICATIONS COMPANY
PETITION FOR ARBITRATION OF AN
INTERCONNECTION AGREEMENT
WITH QWEST CORPORATION

# REBUTTAL TESTIMONY OF KAREN A. STEWART

## ON BEHALF OF

## QWEST CORPORATION

**(Issue 1: Retirement of Copper Facilities)**

**March 23, 2005**

**TABLE OF CONTENTS**

PAGE

I. OVERVIEW ..... 1

II. ISSUE 1 – RETIREMENT OF COPPER FACILITIES..... 2

III. CONCLUSION ..... 22

# I. OVERVIEW

**Q. PLEASE STATE YOUR NAME.**

**A.** My name is Karen A. Stewart. I filed direct testimony in this proceeding on February 25, 2005. I describe my background and job responsibilities with Qwest Services Corporation in that testimony.

**Q. WHAT IS THE PURPOSE OF YOUR RESPONSE TESTIMONY?**

**A.** My response testimony addresses the direct testimony of Covad witness, Michael Zulevic, relating to Issue 1 – Retirement of Copper Facilities. In particular, I respond to Mr. Zulevic's assertions that the conditions Covad seeks to impose on Qwest's right to retire copper facilities are consistent with the FCC's rulings in the *Triennial Review Order* ("*TRO*")[1] and would not affect Qwest's economic incentive to deploy fiber facilities. As I discuss below, Covad's proposal is not consistent with the *TRO*, as the FCC considered and rejected imposing the types of conditions that Covad is seeking. The only requirement the FCC imposed is that incumbent local exchange carriers ("ILECs") must comply with the FCC's notice requirements relating to network modifications when they retire copper facilities, which Qwest clearly does.

As I also address below, Covad's proposals reveal disregard for the FCC's clearly stated policy of promoting the deployment of fiber facilities. In the *TRO* and in other

[1] *Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, 18 FCC Rcd. 16978 ¶ 195 (2003) ("TRO"), *aff'd in part and rev'd and vacated in part, U.S. Telecom Association v. FCC*, 359 F.3d 554 (D.C. Cir. 2004) ("*USTA II*").

orders, the FCC has recognized that it has a Congressionally-mandated obligation to promote fiber deployment so that consumers can have broad access to advanced telecommunications services.[2] A critical component of the FCC's effort to meet this obligation is its decision not to require ILECs to provide unbundled access to fiber-to-the-home ("FTTH") loops, fiber-to-the-curb ("FTTC") loops, and the broadband capabilities of hybrid copper-fiber loops ("hybrid loops"), along with the FCC's related decision confirming the ILECs' right to retire copper loops that are replaced by fiber facilities.[3] Mr. Zulevic's testimony makes it clear that Covad's proposal relating to copper facilities disregards this important policy objective and that, in Covad's view, this Commission should be unconcerned about promoting the deployment of fiber facilities. However, promoting the deployment of these facilities and making advanced telecommunications services widely available to consumers are critical objectives of the Act and sound public policy. The Act and the FCC's pronouncements do not permit undermining these objectives through the type of onerous retirement conditions that Covad is proposing.

## II. ISSUE 1 – RETIREMENT OF COPPER FACILITIES

**Q. ON PAGES 10-14 OF HIS DIRECT TESTIMONY, MR. ZULEVIC DESCRIBES HOW COVAD'S PROPOSAL REQUIRING QWEST TO PROVIDE AN "ALTERNATIVE SERVICE" WHEN IT RETIRES**

---

[2] *TRO* at ¶ 278.

[3] *Id.*

**COPPER FACILITIES WOULD BE IMPLEMENTED. DOES HIS DESCRIPTION PROVIDE ANY FURTHER INSIGHT INTO WHETHER COVAD'S PROPOSAL IS CONSISTENT WITH THE *TRO* AND THE ACT?**

A. Mr. Zulevic's description confirms that there is no support in the Act or the *TRO* for Covad's proposal. At page 12 of his testimony, he explains that Covad's proposed language would require Qwest to provide an undefined "alternative service" at "no increase in cost or decrease in service quality until [a Covad customer] choose[s] to leave Covad." These conditions are not found anywhere in the *TRO* or in the Act.

In the *TRO* proceeding, some parties requested that ILECs be prohibited from retiring copper loops unless they take "transitional measures" that would give CLECs some form of continued access to copper loops or provide CLECs with access to ILEC broadband facilities.[4] The FCC rejected these proposals, choosing instead to require only that an ILEC provide notice of its intent to retire specific copper facilities so that a CLEC can object to the FCC. The FCC found that its notice requirements would "serve as adequate safeguards."[5] Covad's proposed conditions on Qwest's retirement

[4] *Id.* at ¶ 281 & n.822 and ¶ 291 & n.839.

[5] *Id.* at ¶ 281. While the FCC concluded that CLECs are not impaired without access to FTTH loops, it ruled that "in fiber loop overbuild situations where the incumbent LEC elects to retire existing copper loops . . . the incumbent LEC [must] offer unbundled access to those fiber loops, and in such cases the fiber loops must be unbundled for narrowband services only." *Id.* at ¶ 273. Thus, if an ILEC retires a copper loop in a fiber-to-the-home overbuild situation, it has an obligation to provide an unbundled voice channel for narrowband service only – not for broadband service. An "overbuild" situation is distinguished from a newly deployed or "greenfield" fiber loop that does not replace a copper loop. *Id.*

right clearly go far beyond any requirements that the FCC has imposed, and therefore are not consistent with the *TRO*.

**Q. WHAT DETERMINATIONS HAVE OTHER STATE COMMISSIONS REACHED IN EVALUATING WHETHER COVAD'S "ALTERNATIVE SERVICE" PROPOSAL IS CONSISTENT WITH THE *TRO*?**

A. State commissions and Administrative Law Judges ("ALJs") in the four states in which Qwest and Covad have conducted arbitrations have uniformly rejected Covad's proposal and found that such proposal does not comply with the law. In rejecting Covad's proposal, for example, the Washington Commission emphasized that "[t]he FCC did not place conditions on an ILEC's retirement of copper facilities, and concerning FTTH loops, specifically rejected proposals to provide alternative facilities. The FCC found that its requirements for notice of planned network changes to provide 'adequate safeguards.'"[6]

Similarly, in its order issued about three weeks ago, the Utah Commission stated that it finds "no support in the *TRO* for Covad's contention that hybrid loops should be treated differently under the FCC's copper retirement rules than are FTTH or FTTC loops. The FCC has made clear that ILECs may retire copper facilities, presumably *any* copper facilities, so long as they comply with the FCC's notice requirements."[7] With respect to Covad's "alternative service" proposal, the Utah Commission found

[6] Washington Arbitration Order, at ¶ 21.

[7] Utah Arbitration Order, at 10-11. (Emphasis in original.)

"nothing in federal or state law that would impose an obligation on Qwest to provide an alternative service at current costs for an xDSL provider prior to retirement of copper facilities."[8]

The Colorado Commission likewise rejected Covad's proposal, finding that it is without legal support.[9] In addition, the Colorado Commission rejected Covad's position that Qwest's right to retire copper facilities should be limited to situations in which Qwest is replacing copper loops with FTTH loops, and ruled that Qwest is therefore permitted to retire copper loops that it replaces with hybrid copper-fiber loops.[10]

Finally, a Minnesota ALJ rejected Covad's copper retirement proposal in its entirety. In doing so, she explained that "[t]here is no legal support in the TRO for Covad's position concerning 'alternative' services."[11] In an order issued last week, the Minnesota Commission adopted this ruling.[12]

**Q. AT PAGE 10 OF HIS TESTIMONY, MR. ZULEVIC ASSERTS THAT THE RULINGS IN THE *TRO* CONFIRMING THE RIGHT OF ILECS**

---

[8] *Id.*

[9] Colorado Arbitration Decision, at 54.

[10] *Petition of Qwest Corporation for Arbitration of an Interconnection Agreement*, Docket No. 04B-160T, Decision No. C04-1348, Order Granting in Part and Denying in Part Application for Rehearing, Reargument, or Reconsideration at 10 (Colo. Comm'n, Nov. 16, 2004) ("Colorado Reconsideration Order").

[11] See *In the Matter of the Petition of DIECA Communications, Inc., d/b/a Covad Communications Company for Arbitration to Resolve Issues Relating to an Interconnection Agreement with Qwest Corporation*, Minnesota Commission Docket No. P-5692, 421/IC-04-549, Arbitrator's Report at 8 (Minn. Commission Dec. 15, 2004) ("Minnesota ALJ Report").

[12] See *In the Matter of the Petition of DIECA Communications, Inc., d/b/a Covad Communications Company for Arbitration to Resolve Issues Relating to an Interconnection Agreement with Qwest Corporation*, Minnesota Commission Docket No. P-5692, 421/IC-04-549, Order Resolving Arbitration Issues and Requiring Filed Interconnection Agreement at 8 (Minn. Commission March 14, 2005) ("Minnesota Commission Arbitration Order").

**TO RETIRE COPPER FACILITIES APPLY ONLY WHEN AN ILEC REPLACES A COPPER FACILITY WITH A FTTH OR A FTTC LOOP. IS HIS ASSERTION CORRECT?**

A. No. In the *TRO*, the FCC confirmed that ILECs are permitted to retire copper facilities when they replace copper with fiber in all circumstances, not just when the copper loop is replaced with a FTTH or a FTTC loop. Specifically, in the line sharing portion of the *TRO* at paragraph 271, the FCC specifically "decline[d] to prohibit incumbent LECs from retiring copper loops or copper subloops *that they have replaced with fiber*."[13] As this quote clearly demonstrates, the FCC did not limit the right of ILECs to retire copper facilities solely to situations involving the installation of FTTH or FTTC loops. Instead, ILECs are permitted to retire any copper loops and subloops that they have replaced "with fiber." In his discussion of the *TRO*, Mr. Zulevic not only fails to acknowledge this FCC statement, but he also fails to cite any FCC ruling in the *TRO* or in any other order that supports Covad's very narrow reading of an ILEC's copper retirement rights.

**Q. IS MR. ZULEVIC'S NARROW INTERPRETATION OF ILEC COPPER RETIREMENT RIGHTS CONSISTENT WITH THE FCC'S POLICY OF ENCOURAGING CARRIERS TO DEPLOY FIBER FACILITIES?**

A. No. As I discuss in my direct testimony at page12, the FCC has emphasized the importance of encouraging carriers to deploy fiber facilities in order to bring

[13] Emphasis added.

advanced telecommunication services to carriers throughout the country. The FCC again emphasized the importance of this Congressionally-mandated objective in a recent order relating to FTTC loops. In that order, in which the FCC ruled that FTTC loops are subject to the same limited unbundling obligations that apply to FTTH loops, the FCC stressed the importance of "eliminat[ing] disincentives to invest in broadband facilities and, therefore, further section 706's goals."[14]

If the right of ILECs to retire copper facilities were limited to situations involving installations of FTTH loops, as Mr. Zulevic incorrectly claims, ILECs would have reduced incentive to deploy fiber. This reduced incentive would arise because, in the absence of a retirement right, an ILEC would have to maintain both its copper facilities and the newly deployed fiber facility. Faced with the prospect of duplicative maintenance costs, an ILEC would be less likely to install fiber facilities. That result would directly undermine the FCC's policy of encouraging the deployment of fiber.

**Q. WHAT DOES MR. ZULEVIC'S TESTIMONY REVEAL ABOUT WHETHER COVAD CONSIDERED THE IMPORTANCE OF ENCOURAGING THE DEPLOYMENT OF FIBER FACILITIES IN FORMULATING ITS POSITION RELATING TO THE RETIREMENT OF COPPER FACILITIES?**

[14] *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, CC Docket Nos. 01-338, 96-98, 98-147, FCC 04-248, Order on Reconsideration at ¶ 13 (rel. Oct. 18, 2004).

A. Mr. Zulevic's testimony confirms that Covad has disregarded the FCC's clearly stated policy objective of encouraging the deployment of fiber facilities. In view of the FCC's statements about the importance of fiber deployment to consumer welfare, Covad is wrong in assuming that investment incentives are irrelevant to the issue of copper retirement. By proposing language that would decrease incentive to deploy fiber and by failing even to acknowledge the importance of policies that promote investment in fiber facilities, Covad is acting inconsistently with a fundamental goal of the Act.

**Q. AT PAGES 8 AND 11 OF HIS TESTIMONY, MR. ZULEVIC STATES THAT COVAD'S NEWLY REVISED PROPOSAL IS INTENDED TO ADDRESS THE SITUATION IN WHICH QWEST IS RETIRING A COPPER LOOP AND REPLACING IT WITH A "HYBRID LOOP." IN THE *TRO*, DID THE FCC ISSUE A RULING CONCERNING WHETHER ILECS ARE REQUIRED TO PROVIDE UNBUNDLED ACCESS TO HYBRID LOOPS?**

A. Yes. In paragraphs 288 and 290 of the *TRO*, the FCC ruled that ILECs are not required to unbundle the broadband capabilities of hybrid loops, which are loops comprised of both fiber and copper. In reaching that result, the FCC specifically considered and rejected arguments that Covad presented in an attempt to obtain unbundled access to the broadband capabilities of these loops:

> We decline to require incumbent LECs to unbundle the next-generation network, packetized capabilities of their hybrid loops to enable requesting carriers to provide broadband services to the mass market. AT&T, WorldCom, Covad, and others urge the Commission to extend our unbundling requirements

> to the packet-based and fiber optic portions of incumbent LEC hybrid loops. We conclude, however, that applying section 251(c) unbundling obligations to these next-generation network elements would blunt the deployment of advanced telecommunications infrastructure by incumbent LECs and the incentive for competitive LECs to invest in their own facilities, in direct opposition to the express statutory goals authorized in section 706. The rules we adopt herein do not require incumbent LECs to unbundle any transmission path over a fiber transmission facility between the central office and the customer's premises (including fiber feeder plant) that is used to transmit packetized information. Moreover, *the rules we adopt herein do not require incumbent LECs to provide unbundled access to any electronics or other equipment used to transmit packetized information over hybrid loops, such as the xDSL-capable line cards installed in DLC systems* or equipment used to provide passive optical networking (PON) capabilities to the mass market.[15]

As this ruling shows, the FCC has made it clear that ILECs are not required to unbundle the broadband capabilities of their hybrid loops. In proceedings in other states, Covad has stated that Qwest could satisfy Covad's "alternative service" proposal by providing access to the broadband capabilities of hybrid loops, clearly suggesting that a purpose of its proposal is to obtain access to these hybrid facilities. Covad's attempt to obtain this access violates the *TRO*.

**Q. IS THIS FCC RULING RELATING TO HYBRID LOOPS RELEVANT TO COVAD'S REVISED PROPOSAL FOR COPPER RETIREMENT?**

A. Yes. As stated, Qwest is concerned that the underlying intent of Covad's new proposal is to gain unbundled access to the broadband capabilities of hybrid loops -- precisely what the FCC rejected in the *TRO*. In this regard, it is significant that Covad has not offered a definition of the "alternative service" that Qwest would have to provide before retiring a copper facility. In its recent order, the Minnesota

[15] *TRO* at ¶ 288. (Footnotes omitted and emphasis added).

Commission concluded that this vagueness required rejecting Covad's proposal: "Covad's proposed language contains too many ambiguities to constitute a workable interconnection term."[16] Given this vagueness, if Covad's proposal were adopted, it is probable that Covad would claim that access to the broadband capabilities of hybrid loops is the "alternative service" to which it would be entitled. A requirement for Qwest to provide that access would directly violate the FCC's ruling relating to hybrid loops.

Covad's testimony further suggests Covad's intent to obtain unbundled access to hybrid loops through the proposed "alternative service" requirement. Mr. Zulevic states at page 17: "Conversely, of course, Qwest could interpret it in a number of ways, which would meet Covad's needs and not require Qwest to maintain copper plant it otherwise would have retired." The only way Qwest would not be required to maintain the copper plant is if it provided the "alternative service" by unbundling its hybrid feeder fiber to provide unbundled access to the electronics or other equipment used to transmit packetized information over hybrid loops, such as the xDSL-capable line cards installed in digital loop carrier systems.

**Q. AT PAGE 10 OF HIS TESTIMONY, MR. ZULEVIC ASSERTS THAT COVAD'S PROPOSAL PROMOTES "PARITY" BECAUSE IT WOULD RESULT IN COVAD AND ITS RETAIL DSL CUSTOMERS HAVING**

[16] Minnesota Commission Arbitration Order at 8.

**ACCESS TO "EQUIPMENT" THAT QWEST USES TO PROVIDE DSL CUSTOMERS TO ITS CUSTOMERS. IS COVAD ENTITLED TO HAVE ACCESS TO THAT EQUIPMENT?**

A. No. Although he does not state it expressly, the "equipment" that Mr. Zulevic is referring to are xDSL-capable line cards, the type of next-generation equipment that the FCC specifically declined to require ILECs to unbundle in the *TRO*. As the FCC ruling set forth above demonstrates, Qwest is under no obligation to provide unbundled access to its xDSL-capable line cards. Covad's attempt at requiring this unbundling in the name of "parity" is an obvious attempt to circumvent the FCC's ruling in the *TRO*. The Commission should reject Covad's attempt to obtain this impermissible unbundling through its use of the vague "alternative service" requirement, as it already has been rejected in Colorado, Minnesota, and Washington.

**Q. AT PAGE 10 OF HIS TESTIMONY, MR. ZULEVIC ALSO ATTEMPTS TO SUPPORT HIS "PARITY" CONTENTION BY STATING THAT COVAD'S PROPOSAL WOULD PERMIT UNBUNDLED ACCESS TO THE EQUIPMENT QWEST USES TO PROVIDE DSL SERVICE TO ITS OWN CUSTOMERS ONLY FOR LOOPS OVER WHICH QWEST "WOULD BE ABLE TO PROVIDE" DSL SERVICE TO ITS OWN CUSTOMERS. WOULD THAT TYPE OF ACCESS CONSTITUTE "PARITY," AS MR. ZULEVIC CLAIMS.**

A. No. The first point, of course, is that Covad is not entitled to any unbundled access to this type of next-generation equipment. However, even if the FCC had not expressly disallowed such access, Covad's proposal would not result in parity. As is clear from Mr. Zulevic's use of the words "would be able to provide," Covad is seeking access to the next-generation equipment of any Qwest loop over which Qwest *could* provide DSL service to its own customers, not just access to the equipment on loops that Qwest is actually using to provide DSL service. Indeed, Covad's proposed interconnection agreement language does not limit Covad's access to loops over which Qwest is actually providing DSL service to its customers. Accordingly, Covad is not seeking "parity" between its DSL customers and Qwest's customers; instead, it is seeking to require Qwest to provide Covad with access to next-generation equipment even in situations where Qwest's own customers are not served by such equipment.

**Q. AT PAGE 14 OF HIS TESTIMONY, MR. ZULEVIC IDENTIFIES QWEST DSL VOLUME PLAN AGREEMENT ("VISP") AS AN ALTERNATIVE SERVICE QWEST COULD PROVIDE. ISN'T VISP ALREADY AVAILABLE FOR COVAD TO PURCHASE?**

A. Yes, VISP is already available for Covad to purchase and can be utilized when a hybrid loop serves the end user location. However, Mr. Zulevic is proposing that Qwest be required to provide access to Qwest DSL Volume Plan Agreement, or "VISP service," apparently at the state-prescribed recurring rate for the high frequency portion of the unbundled loop. I am inferring that Covad advocates that

rate based on Covad's proposal that any "alternative service" that Qwest provides should not increase the cost to Covad or its end-user (a position reflected in the Covad proposed language for section 9.1.15.1.1 of the ICA in Mr. Zulevic's testimony at page 9).

Under Covad's proposal, Qwest would be permitted to charge the monthly recurring rate of $4.55 for the alternative service, since Covad is currently paying the Commission-prescribed monthly rate of $4.55 for access to the high frequency portion of the unbundled loop. That rate would serve as a cap on Qwest's cost recovery under Covad's proposal, regardless of the amount of the costs Qwest would incur to provide an alternative service. This artificial cap could prevent Qwest from recovering its costs in violation of the Act's cost recovery requirement. Despite Covad's claims to the contrary, a rate of $4.55 may not allow Qwest to recover its costs of providing VISP or any other "alternative service" a CLEC may demand.

In addition, it plainly not appropriate to use the cost of one service to set the rate for potentially an entirely different service. If the Covad proposal is adopted, neither Qwest nor this Commission could attest that all line sharing rates accurately reflect the costs of providing such services at the conclusion of these proceedings.

If the estimated savings for Covad of $2,400 set forth at page 23 of Mr. Zulevic's testimony (the flip side of the Qwest revenue lost) is an accurate statement of the amount at stake here, one wonders why Covad is going through the resource-intensive exercise of seeking arbitration of this issue, particularly when Covad is

essentially asking the Commission to disregard federal law governing the treatment of the unbundling of such services.

**Q. DOES MR. ZULEVIC'S TESTIMONY SUPPORT COVAD'S CLAIM THAT THE RETIREMENT OF COPPER FACILITIES WILL LEAD TO SIGNIFICANT SERVICE DISRUPTIONS FOR COVAD'S CUSTOMERS?**

A. No. On the contrary, Mr. Zulevic emphasizes at page 20 of his testimony that Qwest fiber placement activities have not impacted Covad and that "we reasonably assume that the impact will not be huge." He states that Covad has similarly experienced minimal impact in BellSouth's region even though, according to his testimony, BellSouth "has been far more aggressive than Qwest in replacing copper with fiber."[17]

**Q. GIVEN THE VERY LIMITED SCOPE OF ANY POTENTIAL SERVICE DISRUPTIONS RESULTING FROM QWEST'S RETIREMENT OF COPPER LOOPS, IS IT REASONABLE FOR COVAD TO PROPOSE THE RETIREMENT CONDITIONS IT IS SEEKING?**

A. No. Under Covad's proposal, every time Qwest retires a copper loop that is serving a Covad customer, it would be required to provide an "alternative service" over a "compatible facility." Although Covad does not define this "alternative service," providing such a service would almost certainly require Qwest to incur costs that, under Covad's proposal, Qwest would not be entitled to recover. It would be illogical

[17] Zulevic Direct at 20.

to impose such an ambiguous and potentially costly requirement when, as Mr. Zulevic emphasizes, Covad does not expect any significant problems resulting from Qwest's retirement of copper loops over the remaining few years of grandfathered line sharing arrangements.

Moreover, as I discuss in my direct testimony, Covad's requirements would reduce Qwest's incentive to deploy fiber facilities.[18] If Qwest is faced with the costs of either continuing to maintain copper facilities or providing an "alternative service" over "compatible facilities" each time it considers whether to replace copper facilities with fiber, the economics of that decision will be changed in a way that will make the deployment of fiber less likely. It would be nonsensical to create this disincentive given Covad's acknowledgement that it does not expect Qwest's retirement of copper loops to lead to any significant service disruptions.

**Q. DOES MR. ZULEVIC'S TESTIMONY PROVIDE ANY ADDITIONAL INFORMATION CONCERNING WHETHER COVAD'S PROPOSED CONDITIONS ARE CONSISTENT WITH THE GOAL OF INCREASING NETWORK EFFICIENCY?**

A. Yes. Mr. Zulevic demonstrates the inefficiency of Covad's proposal. At page 7 of his direct testimony, he acknowledges that "the maintenance costs for fiber cable are much lower than they are for copper, resulting in long-term cost savings once fiber

[18] Stewart Direct at 11-13.

and the associated equipment is in place." Under Covad's proposal, if Qwest chose not to provide an "alternative service" upon deploying fiber facilities, it would be required to incur *both* the substantially higher maintenance costs for copper and the lower maintenance costs for fiber. That result would be very inefficient and would further reduce Qwest's incentive to deploy fiber. Qwest should not be encumbered by conditions that prevent it from realizing the network and cost efficiencies that can be achieved by deploying fiber facilities.

**Q. IS MR. ZULEVIC CORRECT IN SUGGESTING AT PAGE 7 OF HIS TESTIMONY THAT COVAD'S PROPOSED CONDITIONS WILL PRESERVE CONSUMER CHOICE?**

A. No. Mr. Zulevic is viewing "consumer choice" from a perspective that is too narrow. He is focusing on the choice of what is, by his own acknowledgement, only a "handful" of customers at most. The more relevant perspective is how the deployment of fiber facilities affects overall consumer choice, not just the choice of a very small number of individual consumers. From that perspective, it is clear that the replacement of copper facilities with fiber significantly adds to consumer choice, as the deployment of fiber substantially increases the bandwidth that is available and allows a carrier to deploy voice, data, and video services over a single loop. Mr. Zulevic himself acknowledges that the additional bandwidth provided by fiber increases competition, and in turn consumer choice, when he states at page 7 of his direct testimony that it allows Qwest "to compete with the cable companies for virtually all the services cable customers generally subscribe to." It is this type of

increased competition, brought about through the deployment of fiber, that generates true facilities-based competition and increased consumer choice.

Moreover, even for the handful of Covad customers that potentially could be affected by the retirement of copper loops, it is not at all clear that they would lose "consumer choice" by being unable to obtain service from Covad. Even if Qwest does not leave copper loops in service, Covad can continue providing service to its customers served over those loops by deploying remote DSLAMs. While Mr. Zulevic states at page 21 of his testimony that it is does not make sense for Covad to deploy DSLAMs, in the *TRO* the FCC specifically sought to promote CLEC investment in remote DSLAMs and other next-generation network equipment. In ruling that ILECs do not have to unbundle packetized fiber loops, as discussed above, the FCC found that giving CLECs access to copper distribution subloops instead of packetized fiber loops would "promote competitive CLEC investment in next generation equipment (*e.g.*, packet switches, remote DSLAMs, etc.) and transmission facilities (*e.g.*, fiber loop facilities built to points in incumbent LEC networks closer to the home)."[19] Thus, the FCC seems to believe that it is economically feasible for CLECs to deploy remote DSLAMs.

**Q. IN HIS DISCUSSION OF "RETIREMENT OF COPPER FACILITIES," MR. ZULEVIC STATES ON PAGE 6 OF HIS TESTIMONY THAT**

[19] *TRO* at ¶ 291.

**PRIOR TO THE *TRO*, COVAD "COULD PROVIDE DSL SERVICE TO END USERS OVER HYBRID COPPER-FIBER LOOPS IF A PACKET SWITCHING FUNCTIONALITY -- AN ILEC DSLAM -- EXISTED ON THAT LINE." IS THAT STATEMENT COMPLETE?**

A. No. Mr. Zulevic's statement seems to imply that prior to the *TRO*, Covad had access to unbundled packet switching ("UPS") if Qwest had deployed UPS. However, in the *UNE Remand Order*, the FCC ruled that ILECs are not required to provide access to UPS except in limited circumstances:

> *We decline at this time to unbundle the packet switching functionality, except in limited circumstances.* Among other potential factors, we recognize that the presence of multiple requesting carriers providing services over their own packet switches is probative of whether they are impaired without access to unbundled packet switching. The record demonstrates that competitors are actively deploying facilities used to provide advanced services to serve certain segments of the market – namely, medium and large business – and hence *they cannot be said to be impaired in their ability to offer service*, at least to these segments without access to the incumbent's facilities.[20]

Under this ruling, Covad was required to place a DSLAM at a remote terminal where hybrid loops were deployed if Qwest had deployed a DSLAM at a remote terminal. Covad was entitled to UPS in this scenario only if, among other criteria, Qwest had deployed a remote DSLAM, while concurrently not permitting Covad to deploy its own remote DSLAM. Mr. Zulevic's statements suggest that under the terms of the *UNE Remand Order*, Covad would never have been required to locate a DSLAM at a

[20] Third Report and Order and Fourth Further Notice of Proposed Rulemaking, *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, 15 FCC Rcd 3696 at ¶ 306 (1999) ("*UNE Remand Order*").

remote terminal and was entitled to access to UPS. That is not a correct statement of the FCC's pre-*TRO* rules.[21]

**Q. AT PAGES 27 OF HIS TESTIMONY, MR. ZULEVIC ASSERTS THAT THE NOTICE QWEST HAS COMMITTED TO PROVIDE TO CLECS WHEN IT IS RETIRING COPPER FACILITIES IS INADEQUATE. ARE HIS CRITICISMS JUSTIFIED?**

A. No. In response to CLEC concerns, Qwest has agreed to send an e-mail notification to all CLECs at the time it posts the network disclosures regarding copper retirements. CLECs routinely use Qwest's network disclosure postings to obtain information about Qwest's network. This process for disseminating information to CLECs is efficient and, contrary to the suggestion in Mr. Zulevic's testimony, is not burdensome for CLECs. The combination of Qwest's e-mail notifications and its postings of network disclosures ensures that CLECs will receive notifications of any plans to retire copper facilities. Finally, Qwest has agreed in its proposed language to comply with all applicable FCC rules relating to notice, thereby ensuring that Covad will receive the notice it is entitled to under the FCC's rules.

**Q. HAVE OTHER STATE COMMISSIONS ISSUED RULINGS CONCERNING THE ADEQUACY OF THE NOTICE THAT QWEST PROVIDES WHEN DECIDING TO RETIRE COPPER FACILITIES?**

[21] *See* pre-*TRO* 47 CFR 51.319 (c)(5) (establishing four requirements for access to unbundled packet switching).

A. Yes. The Washington Commission recently ruled that Qwest's proposed language for the interconnection agreement relating to notice of copper retirement is appropriate and will permit Covad to determine whether a retirement will affect its customers.[22] In doing so, the Washington Commission specifically rejected Covad's "assertion that the FCC's rule requires the identification of specific Covad customers affected by the change, or places the burden solely on the ILEC to determine the impact of the change."[23] The Colorado Commission similarly adopted Qwest's language relating to notice and rejected Covad's language, while modifying Qwest's language to require that notice be sent directly to CLECs.[24] The Utah Commission adopted some of Covad's proposed modifications to Qwest's notice language, but specifically declined to require Qwest to determine which of Covad's customers would be affected by a copper retirement, stating that "[w]e find it reasonable to expect Covad, not Qwest, to make this determination."[25] Finally, the Minnesota ALJ adopted Qwest's language relating to notice, ruling that Qwest's language complies with the FCC's requirements, and that Covad was improperly attempting to shift the responsibility for determining

[22] *In the Matter of the Petition for Arbitration of an Interconnection Agreement Between Covad Communications Co. and Qwest Corp*, Docket No. UT-043045, Order No. 06 at ¶ 21 (Wash. Comm'n, Feb. 9, 2005) (citations omitted) ("Washington Arbitration Order"), at ¶ 16.

[23] *Id.*

[24] *Petition of Qwest Corporation for Arbitration of an Interconnection Agreement*, Docket No. 04B-160T, Initial Commission Decision, Decision No. C04-1037 at 54 (Colo. Comm'n Aug. 27, 2004) ("Colorado Arbitration Decision"). After the Colorado arbitration, Qwest modified its language relating to notice, so that it now provides e-mail notices of retirements to CLECs.

[25] *In the Matter of the Petition of Covad Communications Co. for Arbitration to Resolve Issues Relating to an Interconnection Agreement with Qwest Corp.*, Docket No. 04-2277-02, Arbitration Report and Order at 10-11 (Utah Comm'n, Feb. 8, 2005) ("Utah Arbitration Order"), at 10. (Emphasis in original.)

the street addresses affected by a copper retirement from Covad to Qwest.[26] The Minnesota Commission agreed that Covad, not Qwest, should have the ultimate responsibility for determining whether a Covad customer may be affected by a copper retirement. Accordingly, it directed Qwest to provide sufficient information to enable Covad to determine through its own inquiry whether any of its customers may be affected.[27]

**Q. IS THERE A CERTAIN ASPECT OF COVAD'S PROPOSAL RELATING TO NOTICE THAT CAUSES YOU PARTICULAR CONCERN?**

A. Yes. Among Covad's unreasonable notice demands is its proposal that would require Qwest to inform Covad whether the retirement of a copper loop will affect the service Covad is providing to specific customers. While Qwest provides network facilities to Covad, it does not know the specific services Covad is providing to its customers over these facilities. A requirement for Qwest to tell Covad whether service to its customers would be affected by the retirement of a copper loop would therefore require Qwest to speculate about the services Covad is providing. If Qwest guessed wrong, Covad would undoubtedly seek recourse and attempt to hold Qwest responsible. Qwest should not be put in that unfair position.

**Q. IS THERE ANY MERIT TO MR. ZULEVIC'S ASSERTION AT PAGE 29 OF HIS TESTIMONY THAT IT WOULD BE "ANTI-**

---

[26] Minnesota ALJ Report at ¶¶ 23, 25.

[27] Minnesota Commission Arbitration Order at 10.

**COMPETITIVE" FOR QWEST NOT TO IDENTIFY SPECIFIC COVAD CUSTOMERS WHOSE SERVICE COULD BE IMPACTED BY A COPPER RETIREMENT?**

A. No. Mr. Zulevic states that unless Qwest identifies the specific Covad customers who may be impacted by a copper retirement, Qwest will be capable of "targeting and taking Covad customers." That is a gross exaggeration. As Covad acknowledges, Qwest has never disconnected a single Covad customer from service in Oregon or in any of Qwest's 13 other states by retiring a copper loop. That is hardly the conduct of a company that is "targeting" and trying to "take" Covad's customers away. Instead, the fact that Qwest has never disconnected a Covad customer through retirement of a loop demonstrates that Qwest attempts to implement its copper retirement rights in a manner that minimizes or avoids service disruptions for CLEC customers. As part of that policy, Qwest also provides CLECs with detailed notice of copper retirements that is consistent with the FCC's requirements.

## III. CONCLUSION

**Q. PLEASE SUMMARIZE YOUR POSITION RELATING TO THIS ISSUE?**

A. Qwest has proposed language that complies fully with the FCC's requirements relating to the retirement of copper facilities, and Qwest goes beyond those requirements to minimize the possibility of service disruptions for Covad's customers. By contrast, Covad has proposed onerous retirement conditions that are

not in the *TRO*, that would decrease Qwest's incentive to deploy fiber facilities, and that are not supported by any actual or anticipated experience with the retirement of copper loops. Accordingly, the Commission should adopt Qwest's proposed ICA language relating to this issue.

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes.

**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

**ARB 584**

In the Matter of

**COVAD COMMUNICATIONS COMPANY**

Petition for Arbitration of an Interconnection Agreement with Qwest Corporation

# REBUTTAL TESTIMONY OF MICHAEL NORMAN ON BEHALF OF QWEST CORPORATION

**March 23, 2005**

TABLE OF CONTENTS


| | | |
|---|---|---|
| **I.** | **IDENTIFICATION OF WITNESS** | **1** |
| **II.** | **PURPOSE OF TESTIMONY** | **1** |
| **III.** | **ISSUE 5: CLEC TO CLEC REGENERATION REQUIREMENTS (SECTIONS 8.2.1.23.1.4, 8.3.1.9, 9.1.10).** | **1** |
| **IV.** | **SUMMARY AND CONCLUSION** | **13** |

## I. IDENTIFICATION OF WITNESS

**Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH QWEST CORPORATION.**

A. My name is Michael Norman. My business address is 700 W. Mineral Ave., Littleton Colorado. I am employed as a Director within the Technical and Regulatory Group of the Local Networks Organization of Qwest Corporation ("Qwest").

**Q. ARE YOU THE SAME MICHAEL NORMAN WHO PREVIOUSLY FILED DIRECT TESTIMONY IN THIS ARBITRATION PROCEEDING?**

A. Yes, I am.

## II. PURPOSE OF TESTIMONY

**Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

A. The purpose of my rebuttal testimony is to respond to the direct testimony filed by Mr. Mike Zulevic regarding CLEC-to-CLEC regeneration (Sections 8.2.1.23.1.4, 8.3.1.9, 9.1.10).

## III. ISSUE 5: CLEC TO CLEC REGENERATION REQUIREMENTS (SECTIONS 8.2.1.23.1.4, 8.3.1.9, 9.1.10).

**Q. ON PAGE 31 OF HIS TESTIMONY, MR. ZULEVIC ATTEMPTS TO DESCRIBE QWEST'S POSITION ON REGENERATION. DO YOU AGREE WITH HIS CHARACTERIZATION?**

A. No. Mr. Zulevic improperly claims that Qwest would require Covad to purchase a retail product if it needs regeneration to connect to its own non-contiguous space in a central office. Qwest's proposed language provides that a retail service will be used if

regeneration is required by ANSI standards for a CLEC-to-CLEC connection, not for a Covad-to-Covad connection.

**Q. ON PAGE 36, MR. ZULEVIC DESCRIBES COVAD'S NEWLY PROPOSED LANGUAGE. WHAT CONCERNS DOES QWEST HAVE WITH THIS PROPOSED LANGUAGE?**

A. For Section 8.2.1.23.1.4, Covad proposes the following new sentence: "Qwest shall assess charges for CLEC-to-CLEC regeneration, if any, on the same terms and conditions, and at the same rates as for ILEC or Qwest-to-CLEC regeneration." As with Covad's original proposal, this new proposal asks this Commission to order Qwest to provide regeneration for free, even when Qwest is a bystander to the services Covad and its partner are providing to their customer. Moreover, Qwest objects to Covad's language that would require Qwest to regenerate a connection if requested by a CLEC, even if regeneration is not required by ANSI standards. Even in an ILEC-to-CLEC relationship, Qwest is not obligated to add regeneration if not required to meet the parameters of the ANSI standards. If Covad chooses to deviate from industry standards (*e.g.*, request a better signal than ANSI), it may order a "finished service" out of Qwest's FCC1 Access Tariff Section 21.5.2, Expanded Interconnection Channel Termination ("EICT"), that guarantees a templated signal at both ends of the circuit. Also, adding regeneration into a circuit that does not require it (based on ANSI standards) adds extra costs, some additional circuit delay, and unnecessary unprotected failure points to a circuit.

**Q. MR. ZULEVIC CLAIMS THAT QWEST IS REQUIRED TO PROVIDE CLEC-TO-CLEC REGENERATION FREE OF CHARGE BASED ON FCC RULES AND ORDERS. DO YOU AGREE?**

A. No. Mr. Zulevic's testimony contains legal argument that is more appropriately addressed in a legal brief. However, I must respond by stating that Qwest believes that its obligations are governed by the plain language of the FCC rule, 47 C.F.R. 51.323(h) and that Qwest meets those obligations. As set forth in this FCC rule, Qwest is not required to provide CLEC cross connections *if Qwest permits CLECs to provide their own cross connections*. Where there is no obligation to provide the cross connection, there can be no obligation to ensure that the connection meets ANSI standards. In other words, there is no obligation for Qwest to provide regeneration, at any rate. Under the undisputed terms of Section 8.2.1.23.1 of the proposed ICA, Qwest allows CLECs to provide their own cross connections.

**Q. ON PAGE 32, MR. ZULEVIC SUGGESTS THAT ILEC-TO-CLEC REGENERATION CHARGES SHOULD BE TREATED THE SAME AS CLEC-TO-CLEC REGENERATION CHARGES. DO YOU AGREE?**

A. No. Covad has improperly confused the concepts of an ILEC-to-CLEC connection with a CLEC-to-CLEC connection. In an ILEC-to-CLEC connection, the CLEC is purchasing a UNE from Qwest. The CLEC is using the Qwest network and it designs and is accountable for the circuit. In a CLEC-to-CLEC connection, Qwest is not involved in the relationship between the two CLECs, has no control or involvement in the facilities shared between them, and does not provide a service to the CLEC end-user customer.

**Q. IN MR. ZULEVIC'S TESTIMONY ON PAGES 33-34, HE DISPUTES YOUR TESTIMONY IN THE COLORADO PROCEEDING WITH RESPECT TO THE WAY THAT QWEST INTERPRETS THE MEANING OF THE ANSI STANDARD. BASED ON YOUR ENGINEERING EXPERIENCE, CAN THE CABLE DISTANCE BETWEEN NETWORK ELEMENTS BE DOUBLED PER THE ANSI STANDARD BEFORE REGENERATION IS REQUIRED?**

A. Yes. As part of my oral testimony to the Commission in Colorado, I addressed the last bullet point in section B.2.5 of the ANSI standard, as provided by Mr. Zulevic in his testimony. In using this particular bullet, the standard is specific in referring to the cable distance between equipment and the DSX3 panel of up to 450 feet using 728 A cable or its equivalent. Included as part of my discussion, I also referred to the second bullet under the same section of the ANSI standard on page 30 where "the measurement is made at the out-jack including the effect of 27 feet of cross connect or patch cabling," thus explaining why the relevant distance is 927 feet. A fairly basic principle involved in testing circuits for ANSI compliance demonstrates why this is the relevant distance. Testers typically will test a circuit using a technique called a "loop-back test." This is where a tester will actually loop the circuit from the equipment back on itself at the DSX to measure power levels. The tester will connect the transmit portion of the circuit to the receive portion, creating an end-to-end loop to a particular network element. Engineering design will dictate an *expected* decibel power loss at each component of the network (DSX panels and network elements). The tester will use the engineer's design as a guideline to anticipate power loss and will record the *actual* power loss in decibels to determine whether or not a circuit is performing as projected to meet the standard.

Therefore, if the optimum distance is 450 feet between the network element and the DSX, then the actual distance of the loop is doubled for testing purposes to 900 feet. This same scenario can be applied between network elements owned by the CLEC. If both CLECs perform a "loop-back test" at optimum distances of 450 feet between network element and the DSX and meet the standard, then 900 feet, including a cross-connect at the ICDF where CLECs are able to directly connect network elements to each other to exchange traffic, will meet the ANSI standards for testing purposes.

**Q. ON PAGES 34-35 OF MR. ZULEVIC'S DIRECT TESTIMONY, HE ASSERTS THAT INDUSTRY STANDARDS COULD CAUSE THE NEED FOR A SIGNAL TO BE REGENERATED EVEN IF TWO COLLOCATION SPACES ARE CLOSE TO EACH OTHER. DO YOU AGREE WITH THIS ASSERTION?**

**A.** Not entirely. I agree that the industry standards that must be considered in engineering a cable route within a central office between collocation locations could require a cable length that exceeds the physical distance between two collocation spaces. However, I disagree with Mr. Zulevic's statement on page 35 that there realistically could be a situation in which several hundred feet of cable would be required to connect collocation spaces that are as little as 10 feet apart. Thus, his suggestion that regeneration could be required for collocation spaces that are reasonably close to each other is simply not realistic.

**Q. ON PAGES 40-41 OF HIS REBUTTAL TESTIMONY, MR. ZULEVICE CLAIMS THAT QWEST'S CONTROL OVER COLLOCATION SPACE IS GROUNDS FOR REQUIRING FREE REGENERATION FROM QWEST. PLEASE RESPOND.**

A. Qwest is mandated by the FCC to manage collocation space on a first come, first served basis in a just, reasonable, and non-discriminatory manner. Qwest meets these requirements. Qwest provisions collocation space on a "first come first served basis." Each request for collocation is evaluated based upon space availability at the time it is received to determine the most appropriate location in the premises to meet the CLEC's needs. If the request is for additional space (*i.e.*, an augment to the initial space), Qwest attempts to make contiguous space available. If adjoining space is not available, Qwest engineers a route between the CLEC's collocation spaces to provide cable racking connecting a CLEC's non-adjoining collocation spaces.

Mr. Zulevic's assumption that a CLEC that orders collocation today will be located far away from Qwest or a CLEC who ordered collocation in 1999 is inaccurate. The availability of collocation space is dynamic in that Qwest does not determine if and when a CLEC will enter into a partnering relationship with another CLEC. Collocation spaces can be abandoned or decommissioned by CLECs, thereby freeing up space for CLECs seeking collocation space. Therefore, there is no way to predict into the future concerning what collocation spaces will be available for assignment at any given time. Based upon the currently available space in the majority of Qwest's central offices across the region, Mr. Zulevic agrees that the need for regeneration would be the exception rather than the rule. Moreover, Qwest does not determine if and when a CLEC will enter into a partnering relationship with another CLEC and certainly does not force any CLECs

to adopt specific network architectures as part of their relationships with other CLECs. Qwest has no control over a CLEC's decision to partner with another CLEC. That decision is usually made after the parties have existing collocation space. If regeneration is ever required between CLEC collocation spaces, the need will not arise from an improper assignment of space by Qwest but, rather, will arise from timing and CLEC decisions that are not within Qwest's control.

**Q. WHAT IF THE CLEC IS NOT SATISFIED WITH THE ASSIGNED SPACE PROVIDED BY QWEST? WILL QWEST WORK WITH THE CLEC TO DETERMINE IF AN ALTERNATIVE LOCATION IS AVAILABLE?**

A. Yes. Qwest first provides the CLEC with a feasibility form which indicates first choice, second choice, desired space, and availability. The feasibility study confirms the location reserved pursuant to the CLEC's request for collocation. If the CLEC is not satisfied with the assigned location, Qwest will allow a CLEC representative to tour the entire premises, escorted by Qwest personnel. If an alternative, available location is identified and requested by the CLEC on the site visit, Qwest will reserve that space for the CLEC. Furthermore, pursuant to section 8.2.1.9 of the ICA, a CLEC may request a space availability report that includes the following:

a) available Collocation space in a particular Qwest Premises;

b) number of collocators;

c) any modifications in the use of the space since the last report;

d) measures that Qwest is taking to make additional space available for Collocation;

e) whether sufficient power is available to meet the specific CLEC request;

f) number of CLECs in queue at the Premises, if any;

g) whether the Wire Center is equipped with DS3 capability; and

h) the number and description of Qwest and its Affiliates and CLEC reservations of space.

With this information, a CLEC can request specific available collocation space in a Qwest central office and then design its facilities in a way that is most efficient for its specific business plan. Thus, contrary to the assertion of Mr. Zulevic, Qwest does not unilaterally decide where to place a CLEC's collocation facilities. Nor does Qwest deliberately separate a CLEC's collocation space from other collocation space to impose an unnecessary requirement for regeneration.

**Q. PLEASE COMMENT UPON MR. ZULEVIC'S TESTIMONY ON PAGES 40-41 WHERE HE DISCUSSES AN EXPERIENCE REGARDING THE MINNEAPOLIS DOWNTOWN CENTRAL OFFICE?**

A. In researching Covad's history of collocation in the Minneapolis Downtown central office, I found that Covad has never rejected a Qwest collocation assignment proposal out of **BEGIN CONFIDENTIAL** XXX **END CONFIDENTIAL** requests for collocation in that office. In fact, there is no documentation suggesting that in Qwest's region, Qwest has ever denied a Covad request for a specific space assignment. Covad has accepted

each feasibility study and resulting collocation assignment and only requested one change in Minneapolis central office assignment, which Qwest satisfied by moving Covad's collocation space.

In Oregon, between 1999 and 2004, Covad requested collocation space from Qwest BEGIN **CONFIDENTIAL:** XXX times accepting XXX proposals where Qwest fulfilled their application. The other XXX requests **END CONFIDENTIAL** were either cancelled by Covad or the job expired for unknown reasons to Qwest. The one remaining job not listed in the confidential section was applied for by Covad in the Portland Cherry central office, where Qwest denied Covad's request in 1999. In my research, I was unable to find the reasons for Qwest's denial of collocation space; however, Covad did submit another request in 2000 that Qwest granted and fulfilled. Covad decommissioned the same site in 2001, and then applied yet another time – in 2004 – which Qwest again granted and fulfilled. Further, with the existing space that is available for such collocation requests, Mr. Zulevic's speculation that Covad may find itself in a situation where regeneration will be commonly required is unfounded.

**Q. ON PAGE 43 OF HIS TESTIMONY, MR. ZULEVIC CLAIMS THAT CLECS CANNOT EFFECIENTLY PROVIDE REGENERATION ON THEIR OWN. IS THAT TRUE?**

A. No. Covad and its CLEC partner could regenerate the signal traveling between them by purchasing collocation space and placing repeaters in the space to provide a mid-span boost.

**Q. ON PAGES 43-44, MR. ZULEVIC CLAIMS THAT CLECS MAY NOT BE ABLE TO MAXIMIZE THE SIGNAL STRENGTH FROM THEIR COLLOCATION SPACES. PLEASE RESPOND.**

A. Mr. Zulevic claims that mid point regeneration is necessary for DS3s because a signal cannot be transmitted from the CLEC's collocation space at a high level to reach the other end without risking "bleed over" into adjacent cabling. He further explains that a Covad regenerated signal would cause digital cross-talk and lead to spectrum interference with the signals being transmitted over all adjacent transmission cables using the same cable racking, such that signals transmitted by other carriers are completely scrambled.[1] However, Mr. Zulevic is incorrect. Qwest designs its coaxial cable at the DS3 level by using shielded cable to purposely separate transmit signals from receive signals. The shielded cable protects the integrity of the signal from "bleeding over" whether or not 1) the cable is adjacent to another cable; 2) the cable is located in the same cable rack; or 3) when and if regeneration may be required. This is true of a DS1 design in a Qwest central office as well. Therefore, Mr. Zulevic's claim that there are technical limitations to maximizing a signal at a CLEC's collocation space is simply wrong.

**Q. MR. ZULEVIC CITES UPDATES TO TECHNICAL PUBLICATION 77386, CLAIMING THAT QWEST HAD AGREED TO PROVIDE CLEC-TO-CLEC REGENERATION FOR FREE. DID QWEST MAKE SUCH A REPRESENTATION?**

A. No. In an effort to clarify which party would provide regeneration between Qwest and the CLEC, Chapter 15 was removed, relieving the CLEC of any responsibility to provide

regeneration when the *CLEC connects to Qwest (i.e., an ILEC to CLEC relationship)*. The paragraph in Mr. Zulevic's direct says "the CLEC's are no longer responsible for determining if regeneration is required, Qwest is now responsible for that determination. As a result of this change in responsibility, the tech pub is being updated to remove all statements and NC/NCI codes that indicate that the CLECs need to order regeneration, or are responsible for determining when regeneration is required." This language is specifically based on an *ILEC-CLEC* relationship. In chapter 5 of the technical publication, basic responsibilities remain the same where "the CLEC has the responsibility to design the service for their customer." This is especially true where the CLEC is engaged in a third party relationship with another CLEC to serve end user customers and when Qwest is a bystander to that transaction.

**Q. IN HIS TESTIMONY, MR. ZULEVIC PRESENTED DOCUMENTS IDENTIFIED AS EXHIBITS COVAD/107 AND COVAD/108 FOR THE PROPOSITION THAT QWEST HAS AND SHOULD CONTINUE TO PERFORM ALL CROSS CONNECTION FUNCTIONS, INCLUDING REGENERATION, AS PART OF ITS COCC-X PRODUCT. DO YOU AGREE?**

A. No. Nothing in the exhibits can be read to suggest that Qwest will provide CLEC-to-CLEC regeneration free of charge or that the COCC-X product includes regeneration. Additionally, there is nothing in these exhibits which refute the fact that the COCC-X product is nothing more than a jumper wire from two termination points identified by the CLEC on a common ICDF as discussed earlier in my testimony. Both of these exhibits represent discussions held between Qwest and participating CLECs in the Change

---

[1] Zulevic Direct 44:5-

Management Process ("CMP"). They include responses from Qwest informing the CLEC community what Qwest would do from a technical perspective. The responses have nothing to do with pricing of the services provided.

For example, Exhibit Covad/108 discusses a change Qwest was making to its Technical Publication #77386 ("Tech Pub"). In the change request, Eschelon was concerned that Qwest did not define how it would meet the ANSI standards on a CLEC-to-CLEC cross-connect at the ICDF. Qwest's response was that the Tech Pub change was not eliminating regeneration but was merely removing CLEC responsibility in an ILEC-to-CLEC relationship. Furthermore, this exhibit provides a detailed analysis of the connection at issue and does not discuss the cost of the product.

Exhibit Covad/107 predates Exhibit Covad/108, but is, in effect, the same type of discussion and response. Specifically, the exhibit references a concern Eschelon had regarding Qwest's definition of how it would meet the ANSI standards on a CLEC-to-CLEC cross connect through the ICDF and asked that Qwest commit to providing a signal that adhered to the ANSI standards. Once again, Qwest assured the CLEC community that it would adhere to the ANSI standards on a ILEC-to-CLEC connection. As with Exhibit Covad/108, there is nothing in Exhibit Covad/107 suggesting that if regeneration was required under the ANSI standards on a CLEC-to-CLEC cross connect, Qwest would provide such regeneration free of charge or even at a TELRIC rate. Qwest has never committed to offer regeneration for free, or at TELRIC rates, for CLEC-to-CLEC cross connects. And, since Qwest is essentially a bystander to the CLEC-to-CLEC relationship, there is no good policy reason why Qwest should have to provide regeneration to the CLECs for free, or at TELRIC rates.

**Q. MR. ZULEVIC SUGGESTS ON PAGE 47 THAT QWEST MAKES NO REFERENCE TO "FINISHED SERVICES" IN ITS DOCUMENTATION. IS THIS TRUE?**

A. No. The changes made in Technical Publication 77386 do not alter the facts in this case. A CLEC engineer will design and provision a CLEC's own cables and circuits between collocation spaces. The CLEC will then choose to provide regeneration itself or to submit a request to Qwest to provide regeneration.. The CLEC bases its decision on design parameters required for its own use and its end user. In Section 16 of the Tech Pub, the documentation is replete with instructions on how to order finished services once a circuit is designed. Qwest offers only one product to fulfill the regeneration request by the CLEC under its FCC No. 1 Access Tariff. The "finished service" product, Expanded Interconnection Channel Terminations ("EICT"), is located under Section 21.5.2 of the Tariff where the charges are listed as follows under Private Line Transport Service EICT. The prices reflect a per termination charge.

| Type | USOC | NRC | RC |
|---|---|---|---|
| DS1 (1.544 Mbps) | TKCJX | 313.25 | 17.22 |
| DS3 (44.736Mbps) | TKCKX | 329.00 | 52.50 |

## IV. SUMMARY AND CONCLUSION

**Q. PLEASE SUMMARIZE YOUR TESTIMONY?**

A. As set forth above, Qwest's language on this disputed issue is consistent with Qwest's obligations under the FCC's rules and regulations, while Covad's proposed language has

no sustainable basis in fact or law. Accordingly, the Commission should adopt Qwest's language on this disputed issue.

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes, it does.

**BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON**

**ARB 584**

In the Matter of

**COVAD COMMUNICATIONS COMPANY**

Petition for Arbitration of an Interconnection Agreement with Qwest Corporation

# REBUTTAL TESTIMONY OF
# RENÉE ALBERSHEIM
# ON BEHALF OF
# QWEST CORPORATION

**March 23, 2005**

# TABLE OF CONTENTS

**Page**

**I. IDENTIFICATION OF WITNESS ..... 1**

**II. PURPOSE OF TESTIMONY ..... 2**

**III. ISSUE 8-1: PAYMENT TIME FRAME ..... 3**

COVAD'S CIRCUIT ID ISSUE ..... 3
THE CHANGE MANAGEMENT PROCESS ..... 20
DEAVERAGED RATE ZONES ..... 26

**IV. CONCLUSION ..... 29**

## I. IDENTIFICATION OF WITNESS

**Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND POSITION WITH QWEST CORPORATION.**

A. My name is Renée Albersheim. I am employed by Qwest Corporation ("Qwest") as a Staff Advocate. My business address is 1801 California Street, 24th floor, Denver, Colorado, 80202.

**Q. PLEASE REVIEW YOUR EDUCATIONAL BACKGROUND AND PROFESSIONAL EXPERIENCE.**

A. I have been working in Qwest's Global Wholesale Markets organization since December 2003. Before December 2003, I worked in Qwest's Information Technologies Wholesale Systems organization since joining Qwest in October 1999. As a Staff Advocate, I provide support for Qwest's responses to regulatory issues associated with the 1996 Telecommunications Act, FCC orders, state commission decisions, and other legal and regulatory matters.

Prior to becoming a Qwest employee, I worked for 15 years as a consultant on many systems development projects and in a variety of roles, including the following: programmer and systems developer, systems architect, project manager, information center manager and software training consultant. I worked on projects in a number of industries including: oil and gas; electric; water and telephone utilities; insurance; fast food; computer hardware; and the military. I designed and developed a number of applications, including electronic interfaces like those described later in this testimony. During that time, I worked on several of Qwest's Operations Support Systems ("OSS") as

a consultant on Human Resources and Interconnect Access Billing Systems ("IABS") projects.

In addition to working full-time at Qwest, I also earned a Juris Doctor degree from the University of Denver College of Law, and passed the Colorado Bar Examination in October 2001. Prior to attending law school, I received a Master of Business Administration in Management Information Systems from the University of Colorado College of Business and Administration in 1985, and I received a Bachelor of Arts degree from the University of Colorado in 1983.

**Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE OREGON COMMISSION?**

A. No. However, I did participate in a cost docket workshop in the Spring of 2003.

## II. PURPOSE OF TESTIMONY

**Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A. The purpose of my testimony is to discuss Issue No. 8-1: Due Dates for Amounts Payable, in which I will respond to the claims of Covad witness Elizabeth Balvin regarding the use of a circuit ID to validate line sharing bills; Covad's testimony regarding the Change Management Process ("CMP"); and Covad's concerns regarding validation of deaveraged rate zones.

## III. ISSUE 8-1: PAYMENT TIME FRAME

### COVAD'S CIRCUIT ID ISSUE

**Q. COVAD CLAIMS THAT IT NEEDS MORE TIME TO PAY ITS BILLS BECAUSE OF DIFFICULTIES IT ALLEGEDLY EXPERIENCES TRYING TO VALIDATE QWEST'S BILLS. PLEASE COMMENT GENERALLY.**

A. This issue revolves around the language in an interconnection agreement that determines how much time Covad has to pay its bills to Qwest. Keeping that in mind, Covad has raised a number of issues, not relevant to the language in dispute in the interconnection agreement, to which Qwest must respond. In the testimony that follows, I will discuss the errors in the technical claims that Covad makes with regard to Qwest's bills. Qwest witness William Easton will cover all other aspects of this topic.

I have evaluated the technical claims that Ms. Balvin makes, and it is my conclusion that Covad has the capability itself to resolve any issues it experiences with Qwest bills. Moreover, as I will discuss in detail, it would cost a great deal of money and resources for Qwest to make changes to its systems that Covad seeks simply to accommodate Covad. It is my conclusion that Covad's technical claims have no merit and that they do not warrant an increase in time for Covad to pay its bills to Qwest.

**Q. ON PAGE 8 OF HER TESTIMONY, MS. BALVIN CLAIMS THAT QWEST IS THE ONLY ILEC THAT DOES NOT PROVIDE CIRCUIT ID INFORMATION ON ITS LINE SHARING BILLS. DO YOU BELIEVE THIS IS RELEVANT?**

A. No. All ILECs have operational differences from each other. In fact, many even have operational differences within their own territories. This arises from the fact that certain ILECs were formed from the combination of the original Bell Operating Companies ("BOCs") that were created following their divestiture from AT&T. For example, Qwest's current operating territory, and therefore much of its Operational Support System ("OSS") legacy architecture, is the product of the merger of three predecessor BOCs: Pacific Northwest Bell (covering Washington and Oregon and parts of Idaho); Mountain Bell (covering Arizona, Colorado, parts of Idaho, Montana, New Mexico, Utah, and Wyoming); and Northwestern Bell (covering Iowa, Minnesota, Nebraska, North Dakota, and South Dakota). Pacific Northwest Bell's operating area is now referred to as Qwest's Western Region, Mountain Bell's operating area is now referred to as Qwest's Central Region, and Northwestern Bell's operating area is now referred to as Qwest's Eastern Region.

Thus, a number of Qwest's back office systems still exist in three versions, such as the Customer Record Information System ("CRIS") and the Service Order Processors ("SOPS"), although Qwest has created a single set of electronic interfaces for the CLECs to use to access data in these back office systems.[1] Nevertheless, the fact that there are operational differences within and among ILECs is nothing new, and is not material.[2]

[1] A quick review of Verizon's wholesale website at http://www22.verizon.com/wholesale/local/order/0,19410,,00.html demonstrates that its CLEC-facing processes are actually physically divided between western and eastern regions: Verizon East - CT, DC, DE, MA, MD, ME, NH, NJ, NY, PA, RI, VA, VT, WV; Verizon West - AZ, CA, FL, HI, ID, IL, IN, MI, NC, NV, OH, OR, SC, TX, WA, WI. Qwest has one set of CLEC-facing processes that apply to all 14 in-region states, even though Qwest's back office systems are divided by its three source regions.

[2] In fact, during the section 271 proceedings, certain CLECs raised claims that Qwest systems included requirements not found in the systems of the other ILECs. However, the FCC stated: "Our requirement is that the BOC provide nondiscriminatory access to unbundled network elements at rates, terms, and conditions that are just, reasonable, and nondiscriminatory, **which is not necessarily identical** in every BOC region." *In the Matter of*

**Q. IS THE FACT THAT QWEST WAS THE FIRST ILEC TO PROVIDE THE LINE SHARING PRODUCT ANOTHER REASON FOR OPERATIONAL DIFFERENCES BETWEEN THE ILECs?**

A. Yes. On October 8, 1999, the Minnesota Commission issued an order directing Qwest (then U S WEST) and CLECs interested in line sharing to conduct technical trials to determine the feasibility of line sharing in Minnesota.[3] Qwest and the participating CLECs, including Covad ("the Joint Team"), presented a stipulation resolving issues regarding the provisioning of line sharing.[4] This stipulation resulted in Qwest becoming the first ILEC in the nation to offer line sharing.[5] One of the primary decisions that the Joint Team made was to use what was then called the POTS provisioning system flow (now known as the non-design provisioning system flow), as opposed to the design provisioning system flow, to provision the line sharing product, even though the non-design provisioning system flow did not contain the circuit ID. The CLEC members of the Joint Team apparently believed that they would be able to implement service for their

---

*Application by Qwest Communications International, Inc. for Authorization To Provide In-Region, InterLATA Services in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming*, WC Docket No. 02 – 314, FCC 02-332, at 62 ("FCC Nine State Order") (Emphasis added.)

[3] See *Before the Minnesota Public Utilities Commission, In the Matter of a Commission Initiated Investigation Into the Practices of Incumbent Local Exchange Companies Regarding Shared Line Access*, Docket No. P-999/CI-99-678, Order Requiring Technical Trials, Good Faith Resolution of Operational Issues, and a Resulting Report, issued October 8, 1999. The Joint Team's primary report, sub-reports and associated OSS attachments are included with this testimony as Exhibit Qwest/13.

[4] See *Before the Minnesota Public Utilities Commission, In the Matter of a Commission Initiated Investigation Into the Practices of Incumbent Local Exchange Companies Regarding Shared Line Access*, Docket No. P-999/CI-99-678, Joint Report to the Commission, filed November 22, 1999 *("*Joint Report*").* The Joint Team's primary report, sub-reports and associated OSS attachments are included with this testimony as Exhibit Qwest/13.The Commission ordered the adoption of the stipulation of the parties. See *Before the Minnesota Public Utilities Commission, In the Matter of a Commission Initiated Investigation Into the Practices of Incumbent Local Exchange Companies Regarding Shared Line Access*, Docket No. P-999/CI-99-678, Order Adopting Terms and Conditions for Provisioning of Line Sharing in Minnesota and Initiating a Cost Proceeding, Issued December 3rd, 1999.

[5] See *Third Report and Order in* FCC Doc. No. 98-147 *and Fourth Report and Order in F*CC Doc. No. 96-98, 14 FCC Rcd 20912 (1999) ("Line Sharing Order"), Dec. 9, 1999.

customers more quickly if they were able to use the non-design provisioning system flow instead of the design provisioning system flow because they believed that the provisioning intervals for line sharing using the non-design flow would be shorter.[6]

Importantly, the members of the Joint Team, which included Covad, recognized that since Qwest was the first ILEC implementing line sharing, the end result might not be in line with any industry standard developed at a later time.[7]

Thus, Covad's complaints about missing circuit ID information on its line sharing bills, and its claims that other ILECs provide this information, are nothing more than a red herring. This is especially so since Covad itself was one of the CLECs who helped make the decision to have Qwest's line sharing provisioned out of the non-design provisioning system flow.

**Q. MS. BALVIN STATES ON PAGE 8 OF HER DIRECT TESTIMONY THAT THE INDUSTRY STANDARD FOR BILLING OF LINE SHARING IS TO USE A CIRCUIT ID. IS THAT RELEVANT?**

A. No. First, there are industry guidelines for ordering and billing, but they are simply guidelines and not hard and fast rules. All ILECs follow these guidelines to the extent that their various systems permit, but none of them adheres to these guidelines one hundred percent of the time, and such adherence is not expected or required. All ILECs, including

[6] The decision regarding use of the POTS provisioning flow is reflected in items 8 and 9 of the Decision Point List, attached as an exhibit to the Joint Report (See Exhibit Qwest/13, Albersheim/66-76), and on pages 4 and 7 of the OSS Report (See Exhibit Qwest/13, Albersheim/12-20), both of which were filed by the Joint Team (which included Covad) with the Minnesota Commission on November 22, 1999.

[7] This is noted in the minutes of the Joint Team's OSS sub-group also filed as an exhibit to the Joint Team report. Action Items were identified in which members of the Joint Team were to present the line sharing design results to the Ordering and Billing Forum ("OBF") as a proposal for line sharing standards. (See Exhibit Qwest/13, Albersheim/35-62).

Qwest, provide documentation to CLECs that indicate where their systems may differ from industry guidelines.

Second, as I noted above, the Joint Team that developed line sharing at Qwest (and of which Covad was an active member) understood that the system design developed at Qwest was the first in the industry, and thus that it might not match precisely the guidelines that might be developed later. In fact, the Local Service Ordering Guidelines ("LSOG") for line sharing were not published until November 2001, nearly two years after Qwest implemented line sharing. Notably, the LSOG does not contain a requirement that the circuit ID must exist for line sharing. Therefore, Covad's claim that the circuit ID is an industry standard is invalid.

**Q. WHAT IS THE PURPOSE OF THE CIRCUIT ID FIELD?**

A. The circuit ID field is used for the identification of unbundled loops, and was originally created for use with designed services such as private lines and trunks. The use of the circuit ID was recommended by the Ordering and Billing Forum ("OBF") for the identification of unbundled loops.[8] With the exception of designed services like unbundled loops and private lines, which are identified by circuit IDs, Qwest identifies all customer lines by their telephone number ("TN"), and Qwest's back office systems were designed on that basis. In fact, Qwest still uses TNs to identify customers in its back office systems for non-designed services. Because the TN is used to identify and bill the voice customer, it can not be used to bill Covad for its shared portion of the loop. The inventory of

[8] The OBF is a committee of the Alliance for Telecommunications Industry Solutions ("ATIS"). ATIS creates industry guidelines to assist in the standardization of communications and business operations between carriers. These guidelines serve as a common starting point for carriers, but 100 percent compliance with such guidelines is not expected. While all carriers have differences from these guidelines, these guidelines create a standard method for communicating those differences.

unbundled loops, private lines and similar designed services is maintained in the Trunk Inventory Record Keeping System ("TIRKS"). A comparison of the design and non-design provisioning systems flow attached as Exhibit Qwest/14 demonstrates that the TIRKS system, in which the circuit ID field resides, is only used for the provisioning of products through the design systems flow. Thus, because line sharing is provisioned out of the non-design provisioning systems flow, the circuit ID information that Covad now seeks is not available for inclusion on its line sharing bills.

**Q. WHAT IS THE SIGNIFICANCE OF THE JOINT TEAM'S DECISION TO USE THE NON-DESIGN PROVISIONING SYSTEMS FLOW FOR LINE SHARING AT QWEST?**

A. The choice of the non-design provisioning systems flow for line sharing dictated that the circuit ID field would not be available for use in pre-ordering, ordering, provisioning, billing or maintenance and repair of line sharing at Qwest because the circuit ID is not part of the non-design provisioning systems flow. One should keep in mind that when the Joint Team created the parameters for line sharing at Qwest, there were no industry standards for the identification of shared loops. As stated, Qwest was the first ILEC to implement a line sharing product. Thus, by, choosing the non-design provisioning systems flow for line sharing, the Joint Team determined that the circuit ID field would not be available for use in pre-ordering, ordering, provisioning, billing or maintenance and repair of that product at Qwest.

**Q. HAS COVAD PREVIOUSLY DEMONSTRATED ITS UNDERSTANDING OF THE DIFFERENCE BETWEEN DESIGNED SERVICES, SUCH AS UNBUNDLED LOOPS, AND NON-DESIGNED SERVICES, SUCH AS LINE SHARING?**

A. Yes. On October 21, 2002, Covad submitted a change request to the CMP asking for dual inventory of DSL tie cables because it needed to use its tie cables for multiple products (some designed and some non-designed).[9] Covad demonstrated through its submission of this change request that it necessarily understands separate inventories are maintained for its tie cables (*i.e*. that those used for unbundled loops are maintained in TIRKS (a database available only for products provisioned via the designed flow)), and that tie cables for shared loops are maintained in SWITCH (an operation's system designed to inventory and assign central office switching equipment and related facilities). This change request ("CR") was submitted by Covad witness Michael Zulevic, and the minutes of this CR reflect participation by Covad witness Ms. Balvin while she was still employed with WorldCom. This CR was accepted by Qwest, and it is still pending prioritization by the participants of the CMP.

**Q. YOU STATED ABOVE THAT SHARED LOOPS ARE IDENTIFIED USING A TELEPHONE NUMBER ("TN") INSTEAD OF A CIRCUIT ID. IS THE TN USED TO IDENTIFY A SHARED LOOP IN THE SAME MANNER AS THE VOICE TN ON WHICH THE DATA SERVICE RESIDES?**

A. No. Qwest must be able to distinguish a shared loop (which is a data service sold to a CLEC) from the Qwest retail voice service to which the data service is attached. Thus, the shared loop is assigned its own unique TN. Qwest refers to this identifying TN as the sub-account number. Every shared loop that a CLEC purchases has a unique sub-account number, and Qwest provides the sub-account number to the CLEC at the time the CLEC orders the. Every CLEC also has at least one account number, which is known as the

[9] See Qwest/15 ( SCR102102-1X).

Billing Account Number ("BAN"). Thus, Qwest bills a CLEC on the basis of its BANs, and the line items for the products and services ordered under these BANs are identified by their sub-account numbers.

**Q. MS. BALVIN NOTES ON PAGE 9 OF HER DIRECT TESTIMONY THAT QWEST USES THE CIRCUIT ID FOR ALL OTHER CIRCUIT ID-BASED PRODUCTS, BUT THAT QWEST NEGLECTS TO DO SO FOR LINE SHARING. IS THIS A FAIR ASSESMENT OF QWEST'S USE OF THE CIRCUIT ID?**

A. No. This is not a matter of neglect. As I noted above, line sharing is provisioned using the non-design (or POTS) systems flow. The non-design flow uses a TN to identify shared loops. The circuit ID is only available through the design provisioning systems flow. Therefore, the circuit ID, however, is not available through Qwest's back office systems for line sharing. Accordingly, this means that the circuit ID is not available for pre-ordering, ordering, provisioning, or maintenance and repair for line sharing, and, most pertinent to Ms. Balvin's argument, the circuit ID is not available for line sharing billing. Covad was aware of this issue during the development of the line sharing process by the Joint Team, of which Covad was a member.[10] Minutes of an implementation meeting, at which Covad was present state at item 7:

> 12/17/99
>
> CRIS will establish a separate CLEC summary bill for Line Sharing lines. The format will look the same as current bills for UBL. The CLEC will be provided a Miscellaneous account # for each line on the FOC. CLEC must keep track of Misc# to compare on bill.

[10] See Exhibit Qwest/16 (Implementation Meeting Minutes, January 21 2000).

**Q. ON PAGES 8 AND 9 OF HER DIRECT TESTIMONY, MS. BALVIN COMMENTS ON QWEST'S USE OF AN ID NUMBER IN THE ECCKT FIELD ON FOCS AND CLAIMS COVAD COULD VERIFY BILLS WITH THIS NUMBER IF QWEST PUT THE NUMBER ON COVAD'S BILL. PLEASE COMMENT.**

A. Although the information appears on the FOC, it is not an actual circuit ID. Moreover, Qwest does not flow this information to its back office systems for entry onto the Covad bill. An FOC ("Firm Order Confirmation") is not a bill, but rather, a message transmitted to a CLEC following the submission of a Local Service Request ("LSR"). After the necessary service orders have been created for a CLEC LSR in Qwest's back office systems, an FOC (indicating that the LSR has been received, service orders have been generated, and a due date has been assigned) is then returned to the CLEC. The use of the ECCKT field or a "pseudo circuit ID" on a shared loop FOC is simply an informational feature added to the FOC for the benefit of CLECs.[11] FOCs are returned to CLECs in response to LSRs for all products ordered through the Intermediated Access ("IMA") system, including unbundled loops and shared loops. The purpose of the pseudo-circuit ID is so that FOCs are uniform in appearance regardless of the product that is ordered. The field in the Circuit Detail Section of the FOC that Ms. Balvin refers to in her testimony is simply part of that uniform appearance.

The ECCKT field was created in order to display the circuit ID of an unbundled loop. When the shared loop product was developed, Qwest created this form of pseudo-circuit ID to display in the FOC for a shared loop. On an FOC for shared loop, for the reasons I

[11] For clarity, I will use the term pseudo-circuit ID when referring to the data requested by Covad in the ECCKT field, and circuit ID when referring to the data contained in Qwest's back office systems.

explained previously, this value cannot contain a true circuit ID. Instead, it is simply a combination of a state code, a service code,[12] and the voice service TN. Therefore, when used for shared loops, the pseudo-circuit ID value is not passed on to Qwest's back office systems for ordering, provisioning, maintenance and repair, or billing. Accordingly, this pseudo-circuit ID is not available for placement on Qwest's bills.[13]

**Q. CAN COVAD VERIFY BILLS WITH OTHER INFORMATION ON THE FOC?**

A. Absolutely. The FOC gives the CLEC everything necessary to track the product ordered, and to validate subsequent bills from Qwest for that product. The FOC contains several sections of data:

- Administration Section
- Order Information Section (multiple)
- Circuit Information Section

Included in the Administration Section of the FOC is the Purchase Order Number ("PON"), which is a CLEC-generated value that identifies an order in the CLEC's own systems. The PON is provided on the FOC, as well as on the first bill for service, which also includes non-recurring charges associated with the installation of that service. This section also contains the end-user TN, labeled AN ("account number"), on the form. Finally, the Administrative Section includes the summary bill account.

[12] This service code is not a valid USOC (Uniform Service Order Code), but simply a set of four letters used specifically for the shared loop FOC.

[13] It is difficult to follow this discussion without visuals. Accordingly, I created Confidential Exhibit Qwest/17 using a FOC transmitted after a Covad Line Sharing Order to use as a visual reference to this discussion. Covad referenced this FOC in testimony submitted in other states on this issue.

For a shared loop, there are two Order Information Sections. The first contains the information necessary to add line sharing to the end user's account. The end-user's complete account number is displayed here.[14] The second Order Information Section contains the information necessary to establish billing for this shared loop. This section includes the new sub-account number for the shared loop, which is the number that appears on subsequent bills for shared loop service.[15]

**Q. IN HER DISCUSSION OF COVAD'S ALLEGED NEED FOR A CIRCUIT ID ON ITS LINE SHARING BILLS, MS. BALVIN QUESTIONS THE UTILITY OF WHAT SHE CALLS THE "BTN." BASED ON YOUR UNDERSTANDING OF MS. BALVIN'S TESTIMONY, DOES QWEST PROVIDE THE INFORMATION THAT COVAD ALLEGES IT NEEDS?**

A. Yes. Ms. Balvin states on page 10 of her direct testimony that what Covad receives from Qwest is the customer's BTN (Billing Telephone Number), and that the BTN is not the number associated with the circuit. Her statement is not correct, however. The field that she calls the BTN is actually the sub-account number that I described above. The sub-account number is used throughout Qwest's systems to identify the line shared loop, and as I discussed above, this number is provided to Covad in the FOC. It appears from Ms. Balvin's testimony, however, that what she may prefer is the end-user telephone number

[14] An end-user account number is the combination of the ten-digit TN plus a three-digit customer code.

[15] Confidential Exhibit Qwest/17 contains an example of a complete FOC for a Covad line sharing order, submitted via LSR 10803937. The sub-account number is circled. Confidential Exhibit Qwest/18 is an excerpt of a bill to Covad with the line items for this same sub-account circled. As is apparent from a review of these two confidential exhibits, the sub-account number that Qwest provides on the FOC is also the number displayed in column #1 on the monthly recurring bills that Qwest provides to Covad. This billing design was established as a result of the Joint Team's determination that Line Sharing would be pre-ordered, ordered, maintained, repaired, and billed as a "non-design" product.

assigned to the Qwest retail voice service that Covad's shared loop is being linked.[16] As I discussed above, the end user telephone number is contained in multiple sections of the FOC that is transmitted to Covad following submission of Covad's LSR for line sharing. It is through the FOC that Covad may link the end-user telephone number to the sub-account number that is used to bill Covad for the shared loop. Thus, what Ms. Balvin refers to as the BTN is actually the sub-account number that Qwest has assigned to the line sharing service, and to which Qwest bills Covad for that service.

There is also no basis for Ms. Balvin's stated concern regarding whether or not the sub-account number represents the "actual circuit provisioned." First, this is a misleading statement, as line sharing is not a provisioned circuit in the same manner as an unbundled loop. Rather, line sharing is a *feature*, with some central office provisioning, that is added to an already existing circuit. In any case, the sub-account number that Qwest assigns to a shared loop is validated, stored in Qwest's back office systems, and used by Qwest to bill for the service. It is most certainly an accurate representative value for the shared loop, and Covad can connect the sub-account number by referring to the PON and the end-user TN which appear on the FOC.

**Q. ARE THERE ISSUES WITH USING THE END-USER TN FOR LINE SHARING INSTEAD OF THE SUB-ACCOUNT NUMER?**

A. Yes. Ms. Balvin's testimony creates confusion by referring to the data she is requesting as the BTN. The BTN should not be equated with the end-user TN. Qwest is unable to bill Covad for the line sharing by using the end-user TN because the end-user TN is assigned to

[16] I cannot be certain of Covad's preference on this issue. For example, on page 9, Ms. Balvin states that Covad can use what she calls the "non-standard TN circuit". However, on page 10, she says what she then calls the

the *Qwest retail voice service*. Qwest, however, does not bill the end-user for line sharing. Rather, as the line sharing data end-user is not Qwest's customer, but is Covad's retail customer. Qwest bills Covad for the line sharing and Covad then bills its retail end-user customer for the data service. Thus, in order to properly bill for line sharing, it was necessary for Qwest to create a unique number (the sub-account number) that could then be billed to Covad's BAN instead of the end-user's TN.

**Q. ARE OTHER SHARED PRODUCTS IMPACTED BY THE USE OF THE NON-DESIGN SYSTEMS FLOW FOR PRE-ORDERING, ORDERING, PROVISIONING, BILLING AND MAINTENANCE AND REPAIR?**

A. Yes. "Line splitting" also uses the non-design systems flow. This is so because it combines data service with UNE-P, and UNE-P is provisioned using the non-design systems flow.

**Q. IS LOOP SPLITTING A DESIGN PRODUCT?**

A. Yes. Loop splitting combines data service with an unbundled loop. Because unbundled loops use the design systems flow, loop splitting does also. As a result, loop splitting bills contain a true circuit ID, as this information is available on the unbundled loop to which the data service is attached.

**Q. MS. BALVIN CLAIMS ON PAGE 10 OF HER DIRECT TESTIMONY THAT "COVAD IS SUBJECTED TO MANUALLY INTENSIVE REVIEW PROCEDURES TO SIMPLY VALIDATE THE INFORMATION PROVIDED FOR BY QWEST." IS THIS COVAD'S ONLY OPTION?**

---

BTN "may or may not be the telephone number in question."

A. No. FOCs, Customer Service Records ("CSRs") and Covad's bills are all available electronically. There is no valid reason for Covad to argue that it is forced to manually validate its bills given that all the data Covad requires for validation is available in electronic form.

**Q. ARE YOU SUGGESTING THAT COVAD COULD ELECTRONICALLY VALIDATE ITS BILLS WITH THE INFORMATION ALREADY PROVIDED ON THE BILLS THAT COVAD RECEIVES FROM QWEST?**

A. Yes. There are a number of ways that Covad could use the information it already receives. As a former computer programmer, I can think of several ways that Covad could use the information that it already receives in order to validate its bills electronically.

A primary purpose of the FOC is to give CLECs all the information they need to validate bills. Ms. Balvin indicates that the circuit ID that she sees on the FOC is important for bill validation purposes since it "accurately reflects the line in question." In other words, the circuit ID is a unique identifier. However, the sub-account number that Qwest provides is also a unique identifier, and it is the unique identifier that Qwest uses for all subsequent activities related to each shared loop account.[17] Covad could include a function in its ordering systems to electronically retrieve the sub-account number that provides Qwest on the FOC and relate that number to the end-user TN that is also available on the FOC (and that is presumably also available in Covad's own ordering systems). Covad could add the sub-account field to its customer record, or store it separately in a table that could then be

[17] Information regarding the use of the sub-account number is well documented on Qwest's Customer Record Information System ("CRIS") Billing Product Catalog ("PCAT"), located on Qwest's wholesale website at http://www.qwest.com/wholesale/clecs/cris.html. A copy of this web page is attached as Exhibit Qwest/19.

used as a part of the bill validation process. Covad could also relate the sub-account number to its PON (Purchase Order Number), which Covad provides when it requests the service. Again, Qwest provides the PON to Covad, along with the sub-account number, on both the FOC and the first bill.

Accordingly, there are a variety of programming solutions that Covad could easily use to allow for electronic bill validation using the sub-account number that Qwest provides. In fact, Qwest believes that other CLECs have created such processes without much trouble or expense to allow them to validate their bills electronically. Finally, one must remember that the decision to use the non-design provisioning systems flow for line sharing, with its lack of a circuit ID, was made jointly with CLECs, including Covad. Thus, it is rather surprising that Covad has not programmed its systems to perform these types of electronic bill validation processes years ago, especially since it was the first CLEC to order line sharing from Qwest, and it played such an integral role in the implementation of line sharing at Qwest.

**Q. DOES MS. BALVIN'S CLAIM THAT COVAD "WOULD HAVE TO BUILD A UNIQUE SYSTEM TO VALIDATE QWEST'S BILLS" MAKE SENSE TO YOU AS A PROGRAMMER?**

A. No, it does not. Ms. Balvin has indicated that Covad has a billing system that currently makes use of the FOC that Qwest provides to extract information required for billing validation. Thus, it should be possible for Covad to make minor changes to its existing systems to use a different part of the same FOC for Qwest's bills. It should not be necessary for Covad to build a separate unique system to accommodate Qwest's bills.

**Q. MS. BALVIN CLAIMS ON PAGES 10 AND 11 OF HER DIRECT TESTIMONY THAT COVAD'S EFFORTS TO VALIDATE ITS BILLS ARE COMPLICATED BY THE FACT THAT QWEST DOES NOT HOUSE DOCUMENTED BUSINESS RULES EXPLAINING THE BILLING PROCESS. IS HER CLAIM ACCURATE?**

A. No, not at all. Moreover, Ms. Balvin's statement does not make any sense. If Ms. Balvin were correct, one would need to ask how any CLEC could validate any bills if Qwest did not provide documentation of its business rules. Qwest would certainly not have passed the third-party test of its OSS and billing systems, nor could it have satisfied the requirements of the state and federal section 271 reviews of its billing operations, without sufficient and accessible documentation of Qwest's billing business rules. For example, Exhibit Qwest/19 is the documentation for the CRIS billing system, and which describes the use of the sub-account number in significant detail. This exhibit is posted on the public Qwest wholesale website. I do not know the basis for Ms. Balvin's statement that Qwest does not house its billing business rules.

**Q. MS. BALVIN SUGGESTS THAT QWEST SHOULD BE REQUIRED TO MAKE SYSTEMS CHANGES TO CONFORM TO INDUSTRY GUIDELINES. IN OTHER WORDS, SHE CLAIMS THAT COVAD SHOULD NOT HAVE TO MAKE SYSTEMS CHANGES. IS THAT A VALID EXPECTATION?**

A. No. First, let me reiterate that Qwest was the first ILEC in the country to establish line sharing, and Covad was a key participant in the design of the process that Qwest implemented in 1999. Thus, Qwest has been providing line sharing bills without the circuit ID for quite some time now. This begs the question why it has taken Covad so long to

determine that it is somehow not capable of electronically validating the line sharing bills that it receives from Qwest.

Second, Ms. Balvin's discussion (and specifically her statement that Covad would have to build a separate system for Qwest bills) implies that the changes that Covad would have to make to use the information that Qwest already provided would somehow be more difficult for Covad than for Qwest. I do not agree.

Based on my experience as a programmer, and my general understanding of the business activities of our companies, I believe that it would be simpler, and likely less costly, for Covad to make adjustments to its own billing systems (which are likely much newer and less complex) than it would be for Qwest to change its billing systems. That is not to say that Qwest's billing software is inefficient or ineffective. To the contrary, Qwest's billing software handles enormous volumes of data, producing bills for a wide variety of retail and wholesale products to a wide variety of retail and wholesale customers. Therein lies the issue. Qwest's back office billing systems are incredibly complex. They receive data from a variety of systems, and they transmit data to a variety of systems. They produce bills not only for CLECs, but for all of Qwest's customers, including end-user retail customers, CLECs, inter-exchange carriers, wireless carriers and other wholesale customers. Any proposed programming change to a Qwest back office system would need to be evaluated for its potential to impact more than only one kind of bill, and would need to be thoroughly tested to ensure that there are no unintended impacts from the change.

Third, and most critical, a change to the format of the line sharing bill likely would impact other CLECs. If Qwest were to add information in the column of the bill where Covad

expects to find a circuit ID, that new data would be transmitted to all CLECs. Thus, it is very possible that other CLECs would have to make changes to their billing validation processes to account for the new data that would then be on their bills.

Finally, it would not be realistic or reasonable to suggest that Qwest could make such software changes only for Covad's bills. The cost to Qwest to program and administer unique bills for any particular CLEC would be astronomical. Qwest cannot be expected to create separate methods and operating procedures for every CLEC with which it does business.

## THE CHANGE MANAGEMENT PROCESS

**Q. MS. BALVIN CLAIMS THAT COVAD SHOULD BE GIVEN MORE TIME TO PAY ITS BILLS IN PART BECAUSE OF DIFFICULTIES COVAD HAS EXPERIENCED WITH THE CMP PROCESS AT QWEST. PLEASE COMMENT GENERALLY.**

A. Ms. Balvin's statements regarding the Change Management Process ("CMP") are inaccurate. I will demonstrate that Qwest has been and continues to be very responsive to CLEC needs through the CMP that Qwest does indeed accept change requests for billing, and that denials of change requests (CRs) are reasonable and justified. More importantly, none of the assertions that Ms. Balvin makes with regard to the CMP support her claim that Covad needs more time to pay its bills.

**Q. MS. BALVIN'S DISCUSSION OF QWEST'S DENIAL OF COVAD'S RECENT CIRCUIT ID CHANGE REQUEST[18] SUGGESTS THAT A DENIAL FOR COST IS NOT REASONABLE. IS THAT A VALID CRITICISM?**

A. No. It is reasonable for Qwest to determine that a particular change request should be denied, and the CMP document that Ms. Balvin included as an exhibit to her testimony provides for such denials. Specifically, that particular document provides as follows:

> OSS Interface Change Request may be denied for one or more of the following reasons:
>
> • Technologically not feasible – a technical solution is not available
>
> • Regulatory ruling/Legal implications – regulatory or legal reasons prohibit the change as requested, or if the request benefits some CLECs and negatively impact others (parity among CLECs) (Contrary to ICA provisions)
>
> • Outside the Scope of the Change Management Process – the request is not within the scope of the Change Management Process (as defined in this CMP), seeks adherence to existing procedures, or requests for information
>
> • Economically not feasible – low demand, cost prohibitive to implement the request, or both
>
> • The requested change does not result in a reasonably demonstrable business benefit (to Qwest or the requesting CLEC) or customer service improvement
>
> Qwest will not deny a CR solely on the basis that the CR involves a change to back-end systems. Qwest will apply these same concepts to CRs that Qwest originates. The Special Change Request Process (SCRP) (Section 10.4) may be invoked if a CR was denied as economically not feasible.[19]

The CMP document also provides alternatives for CLECs for which CRs (change requests) have been denied. As noted above, one option permits the CLEC to invoke the SCRP

[18] See Exhibit Qwest/20 (SCR100104-01).

[19] See Covad Exhibit 203 at page 28.

(Special Change Request Prices), which allows the CLEC to fund the work to be done by Qwest.[20]

In addition, the CMP document provides several dispute resolution options. For example, a CLEC may escalate a denied CR to Qwest[21] or to the CMP Oversight Committee.[22] In fact, Covad has used this escalation process in the past. Finally, a CLEC may seek dispute resolution through arbitration or through a state regulatory commission.[23]

Notably, Covad has never escalated this CR to the CMP Oversight Committee, nor has it sought dispute resolution with regard to this CR, as set forth in the provisions of the CMP document that I described above. In essence, Covad has not exhausted the process available through the CMP with regard to CR SCR100104. I believe it is inappropriate for Ms. Balvin to now introduce this issue in its arbitration proceeding against Qwest.

**Q. MS. BALVIN CLAIMS ON PAGE 13 OF HER DIRECT TESTIMONY THAT QWEST'S DENIAL OF CR SCR100104 IS TOO VAGUE. DO YOU AGREE?**

A. No. Ms. Balvin fails to state in her testimony that Qwest agreed, through the CMP, to provide more detail regarding the programming tasks that made Covad's request so expensive. Ms. Balvin implies that Qwest is somehow trying to hide information. That is certainly not the case. It is apparent that Covad did not understand the complexity and impact of its request, and Qwest agreed to add to the explanation of the complexity, and

[20] See Covad Exhibit 203 Section 10.4 beginning on page 79.

[21] See Covad Exhibit 203 Section 14.0 beginning on page 97.

[22] See Covad Exhibit 203 Section 14.0 beginning on page 109.

[23] See Covad Exhibit 203 Section 15.0 beginning on page 99.

therefore the high costs, of Covad's request. Qwest's revised response to Covad, on January 10, 2005, stated:

> Below is a high level itemization of the LOE for this request. The complexity and cost for this request spans multiple systems from ordering through billing. The Shared Loop circuit id is not currently housed in the ordering or billing systems, thus several systems would require changes in order to create a field for the circuit id, recognize, retain and pass the circuit id information through to the bill output.
>
> In addition to the changes to implement this new functionality, the existing accounts would have to be converted to support the enhancements to the circuit ID. This conversion would require extracting the circuit id from a free flow text to populate the newly created shared loop circuit id field. Additional modifications would have to be made to address the issue that in order for the new circuit id to appear on the CRIS billing account, both the end user and the Line Share billing Customer Service Records will need to be involved.
>
> Process changes for this request would include changes to the media procedures, changes to PCAT documentation, and re-training of Center personnel for bill validation via the electronic media.
>
> Consequently, Qwest is respectfully denying your request for SCR100104-01, due to economic infeasibility.[24]

**Q. MS. BALVIN CLAIMS ON PAGE 13 OF HER DIRECT THAT IN RESPONSE TO COVAD'S ESCALATION OF SCR100104-01, QWEST "HAS PROVIDED A BIT MORE DETAIL." IS THAT A FAIR CHARACTERIZATION OF QWEST'S RESPONSE TO COVAD'S ESCALATION?**

A. No, not at all. Qwest provided significant additional detail, including a break-down of the tasks covered by the cost estimate for the CR.[25] Also included in this response was a detailed breakdown of the tasks required to implement Covad's CR, as follows:

[24] See Qwest/20.

[25] See Exhibit Qwest/21 (Escalation 33 Qwest Response).

| Changes to Ordering Systems $25,500 | |
|---|---|
| FID development & implementation into the Ordering systems | Develop new Telcordia approved Field Identifer (FID) |
| Enhancements to IMA to pass the TN based circuit ID to the ordering system | IMA AN field required to pass TN data to service ordering systems to populate data. |
| Enhancements to service order creation and distribution systems | Programming to populate the TN based circuit ID behind newly created FID. |
| Implementation of edits for downstream accuracy | Edits to prevent formatting errors. |
| System specific testing | Each system impacted conducts testing of changes. |
| End to end testing for all ordering system changes | All ordering systems conduct an end to end testing to ensure ordering components are correct. |
| Regression testing | Execution of a series of test cases to ensure other functionality continues to perform as expected. |
| **Changes to Billing Systems $828,500** | |
| **Updating Existing Line Sharing Accounts:** | |
| Define and code the program(s) to create the new FID data | Create logic to assign state code, service code, and end user's 10 digit TN that was populated on the original AN field of the LSR. |
| Execute program(s) to insert the new FID and the corresponding data to the billing account records for the existing Line Sharing accounts | Update the existing accounts. |
| Create reports to allow for manual intervention for fallout | Assess fallout and address manual intervention to ensure accuracy.* |
| Create new customer account records and update the appropriate systems | Creates new CSRs for these updated accounts. |
| **Enhancements to Support New FID and Data:** | |
| Implement the new FID into the billing systems by region | Implementation of newly developed FID and floated data in billing systems. |
| Enhance service order posting to the billing systems to accept the new FID and associated data from ordering | Bill post updates. |
| Allow for FID retention in the billing account record and make it available for the customer account record | Implement FID and floated data retention on Line Share billing CSR. |
| Allow for CSRs to be updated with the new FID and associated data | New FID and data will be on the CSR. |
| Pass the new FID and data to the bill presentation/staging area for bill output | Allows the new FID and corresponding data to be on the bill output at sub account level. |
| Individual billing system testing | Each system impacted conducts testing of changes. |
| End to end testing for all billing system changes | All billing systems conduct end to end testing to ensure billing account and customer components are correct. |
| Regression testing | Execution of a series of test cases to ensure other functionality continues to perform as expected. |
| **Process Changes $50,000** | |
| Internal Documentation Implementation | Qwest documentation and notification |
| External Documentation Implementation | CLEC documentation and notification |
| Internal Training and Development | Qwest training and development |
| | |

* Overall cost may increase due to manual intervention caused by significant fallout

**Q. IS MS. BALVIN'S STATEMENT ON PAGE 13 OF HER DIRECT TESTIMONY THAT QWEST'S PROPOSAL FOR THE CHANGE REQUEST "WAS NOT WHAT COVAD'S CHANGE REQUEST REQUESTED" CORRECT?**

A. No. Her statement demonstrates her lack of knowledge of Qwest's back office systems and processes. It is apparent from Ms. Balvin's statement that she is not aware that the method for transmitting circuit IDs to line sharing bills. Qwest described that method in its response to Ms. Balvin's claims that Qwest's proposal to use a FID to transmit the Circuit ID, as described in the table on page 24 above, does not address what Covad has requested. Ms. Balvin is incorrect. The method described is the method Qwest uses today to transmit circuit IDs for designed products. In other words, Qwest uses a FID today to flow circuit IDs through its back office systems for designed products, such as unbundled loops.

**Q. WHAT PART OF COVAD'S CHANGE REQUEST CAUSES THE MOST EXPENSE FOR QWEST?**

A. As it turns out, the portion of this change request that has the highest cost is identified in the table on page 24 of my rebuttal testimony as "conversion of existing accounts." Nearly two thirds of the cost estimate is the effort required to collect data on existing accounts and to add the circuit ID to those accounts. In fact, as noted on the table, it may not be possible to make the change to all accounts electronically, and manually processing of accounts that "fall out" of the process adds significant expense to Qwest. Qwest's overall estimate of this change request may actually be understated. Ironically, Covad's failure to raise this issue sooner directly results in a greater financial impact to the changes they seek. Qwest should not have to bear the cost of their failure to timely seek a change to the billing methodology or adapt their systems to what has existed for 5 years.

**Q. IS MS. BALVIN'S DISCUSSION OF REGULATORY CRs ON PAGE 15 OF HER TESTIMONY RELEVANT TO THE ISSUE OF PAYMENT TIME PERIODS?**

A. No. An argument regarding whether or not a regulatory CR undermines the CMP has no bearing on whether or not Covad should be given more time to pay what it owes to Qwest. If by her discussion she is asking the Commission to order Qwest to make changes to its billing systems to include a circuit ID, her testimony and request are outside the scope of this arbitration proceeding. Such a request was not raised during the parties' negotiations regarding the terms of the interconnection agreement at issue in this proceeding, nor did Covad raise it in the initial petition that it filed in this docket (or any arbitration proceeding in any other state). As a result, this should not be a relevant consideration for the Commission in the context of this docket.

## DEAVERAGED RATE ZONES

**Q. MS. BALVIN CLAIMS ON PAGE 16 OF HER DIRECT TESTIMONY THAT THE USE OF A SINGLE USOC FOR PRODUCTS THAT HAVE MULITPLE RATES IS A DEFICIENCY IN QWEST'S BILLING SYSTEM. DO YOU AGREE?**

A. No. Although not explicit in her testimony, I believe Ms. Balvin was speaking about the fact that some products have rates that have been deaveraged.[26] In this circumstance, Ms. Balvin is correct that for some USOCs (Uniform Service Order Codes), there can be multiple rates applied. Frankly, multiple rates exist for all USOCs, since each product can have a different rate in each state. When Qwest implemented deaveraging, it created a field

[26] The FCC established in its pricing rules that "State commissions shall establish different rates for elements in at least three defined geographic areas within the state to reflect geographic cost differences." See 47 CFR 51.507(f). This Commission thereafter deaveraged unbundled loop rates in three geographic zones in docket

containing each customer's rate zone in the customer's address in its OSS systems. This information is found in the field "RATEZONE," which is displayed when a CLEC performs an Address Validation Query ("AVQ"). There are a number of ways to maintain the rate zone information, and then use that information as a part of the bill validation process. It would make the most sense for Covad to capture the rate zone information as a part of its ordering process. Covad could then store this value with the customer's address, as Qwest does. Covad could also save the information in a reference table designed specifically for the bill validation process.

**Q. PLEASE DESCRIBE AN ELECTRONIC BILL VALIDATION PROCESS USING THE RATE ZONE INFORMATION RETRIEVED FROM THE AVQ.**

A. Covad could include a link between its billing system and either its customer information database or a special table containing the rate zone as I describe above. By simply combining that information with a table containing the valid rates for each zone in each state, Covad could then electronically validate that the rate on the bill matches the rate it expects for each specific customer.

**Q. DOES QWEST PROVIDE ANY OTHER INFORMATION THAT COVAD COULD USE WITHIN A BILL VALIDATION PROCESS?**

A. Yes. Qwest's public website contains detailed information regarding deaveraging.[27] Included in this information are links to downloadable spreadsheets that identify the rate zones by wire center. Oregon and eleven other states in Qwest's territory deaveraged rates

---

UM 962.

[27] See Exhibit Qwest/22 (Geographic Deaveraging General Information) and Exhibit Qwest/23 (MSA and Geographic Zone Data).

by assigning wire centers to rate zones. The wire center assignments that each state has ordered are listed by each wire center. The wire centers are then identified by a Common Language Location Identifier ("CLLI") Code.[28] Covad has the CLLI code information for the wire centers in which it collocates, and thus would presumably keep track of which customers it serves out of these wire centers. Given all of this available information, Covad could easily validate bill rates by using reference tables which contain the rate zone assignments by wire center, and the customers assigned in each wire center.

**Q. DOES THE USE OF A SINGLE USOC FOR PRODUCTS WITH DEAVERAGED RATES PREVENT COVAD FROM ELECTRONICALLY VALIDATING BILLS FOR THESE PRODUCTS?**

A. No. In fact, the use of a single USOC, rather than multiple USOCs, actually decreases the complexity of the validation process. Again, since deaveraging has been in use for some time, it is rather surprising that Covad has apparently yet to establish an automated process to validate deaveraged rates.

**Q. DID COVAD RAISE THIS ISSUE WITH THE CMP?**

A. Yes. Covad submitted CR (change request) SCR051403-2X on May 14, 2003. Covad then withdrew this CR in part on September 19, 2003, because as an email to Covad included in the CR indicates that "questions regarding the zone information were resolved through discussions with Qwest SME's."[29] In other words, once Covad apparently learned of the rate zone process, a change was no longer required. If, however, Covad has now changed its mind, and thus has determined that a change is required, Qwest believes that the CMP

[28] See Exhibit Qwest/24 (Oregon Wire Center Rate Zone Assignments).

[29] See Exhibit Qwest/25 (SCR051403-2X). A SME is a subject matter expert.

(and not an arbitration proceeding) is the appropriate forum to request a change to the rate zone process.

## IV. CONCLUSION

**Q. PLEASE SUMMARIZE YOUR TESTIMONY.**

A. Covad has not presented any credible evidence that Qwest fails to provide sufficient information for Covad to perform electronic validation of the line sharing bills that it receives from Qwest. Qwest reiterates that the CMP is the appropriate and viable forum through which Covad may seek reasonable changes to its bills or other processes. Finally, Covad has not demonstrated that the use of a single USOC for products with deaveraged rates creates any deficiency in Qwest's bills. In conclusion, Covad has not provided any basis for which it can reasonably claim that it needs more time to pay its bills.

**Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

A. Yes, it does.

# DOCUMENTS FILED WITH MINNESOTA PUBLIC UTILITIES COMMISSION BY JOINT TEAM (INCLUDING QWEST AND COVAD) ON NOVEMBER 22, 1999

**STATE OF MINNESOTA**
**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

| | |
|---|---|
| Edward A. Garvey | Chair |
| Joel Jacobs | Commissioner |
| Marshall Johnson | Commissioner |
| LeRoy Koppendrayer | Commissioner |
| Gregory Scott | Commissioner |

| | | |
|---|---|---|
| In the Matter of a Commission Initiated Investigation Into the Practices of Incumbent Local Exchange Companies Regarding Shared Line Access | ) ) ) ) | Docket No. P-999/CI-99-678 |

**JOINT REPORT TO THE COMMISSION**

This report to the Commission was prepared cooperatively and is submitted by U S WEST Communications, Covad Communications Company, Rhythms Links Inc. (formerly ACI), NorthPoint Communications Inc., Onvoy, and Sprint Communications Company L.P. New Edge Network, Inc., and JATO Communications Corporation took part in the

## I. THE BACKGROUND FOR THIS REPORT

On October 8, 1999, the Commission issued an Order Requiring Technical Trials, Good Faith Resolution of Operational Issues, and A Resulting Report regarding line sharing. In the Order, the Commission directed USWC and any interested data CLECs to conduct a technical trial of the CLECs' equipment to determine whether the CLECs' equipment interferes with USWC's voice grade network. In addition, the Commission ordered USWC and any interested CLECs to work together to develop proposed terms and conditions under which USWC would provide line sharing to data CLECs. The Commission indicated that these "terms and conditions" discussions should address the following operational issues: (i) responsibility for central office equipment, (ii) loop testing and repair arrangements, and (iii) notification of

customers and the LEC sharing the line as necessary to enhance service efficiency and effectiveness.

On October 18, 1999, the Commission issued a Notice of (i) Report Deadline and Content, (ii) Commission Meeting, and (iii) Proposed Agenda. With respect to the technical trial, the Commission indicated that the report should contain (i) a description of the research method employed, (ii) an executive summary of the results, (iii) all supporting documentation, and (iv) a joint statement from the companies' technical staffs conducting the trials, clearly indicating the issues where the technical staffs agree and where they disagree. With respect to the discussion of non-technical terms and conditions, the Commission indicated that the report should include a joint statement as to which issues have been resolved and which issues remain unresolved.

## II. HOW THE PARTIES APPROACHED THEIR TASK

U S WEST and the CLECs divided themselves into three teams to address the Commission's order. The Technical Testing Team designed and conducted the lab and field tests of the CLECs' equipment. The Operational Impacts Team worked together to identify and solve operational questions raised by line sharing. The Administrative Team performed an oversight function and addressed policy and business issues.

## III. THE FORMAT OF THIS REPORT

This report includes four major components:

- **The Team Reports.** Each team prepared a report of its work for the Commission. Each report generally describes the work performed by the team, provides an executive summary of the agreements and/or conclusions reached by the team (if any), and describes any exhibits attached to the report.

- **The Exhibits.** The Technical Testing Team and the Operational Impacts Team selected and prepared a group of exhibits that set out the detail of the work they performed. The exhibits are attached to the reports from the respective teams.
- **The Decision Point List**. The Administrative Team prepared a Decision Point List ("DPL") identifying critical line sharing issues for the Commission. The DPL states whether U S WEST and the CLECs agreed on the resolution of the issue and, if so, states the joint resolution reached by the parties. If an issue remained unresolved or disputed at the end of the parties' discussions, the DPL sets out both U S WEST's position and the CLECs' position on that issue.
- **The Terms and Conditions for Line Sharing**. If the Commission orders line sharing, these are the terms and conditions on which the parties reached agreement. Because some unresolved and/or disputed issues remain, additional terms and conditions may be necessary to make line sharing operational in Minnesota. At the end of the Terms and Conditions for Line Sharing, the parties identified the unresolved or disputed issues that must be resolved for line sharing to be implemented.

## IV. CONCLUSIONS REACHED

The parties reached the following conclusions regarding line sharing based on the technical trials and the operational discussions:

- The performance of all of the tested CLEC line sharing equipment fell within acceptable parameters of the standards referenced in the technical test report.
- U S WEST can modify its systems to support line sharing.

- U S WEST and the CLECs can work cooperatively to address repair and maintenance issues.
- The CLECs will have the option to purchase the central office splitters or to have U S WEST act as the CLEC agent and purchase the splitters. The splitter will be leased to U S WEST for $0. U S WEST will install, control, maintain and repair the central office splitters. The CLECs may re-negotiate this point with U S WEST in the future.
- U S WEST and the CLECs must work closely together to help set customer expectations and to educate customers regarding line sharing.

## V. MAJOR UNRESOLVED AND/OR DISPUTED ISSUES

The parties identified the following unresolved and/or disputed issues related to line sharing:

- U S WEST believes further testing is required before any decision should be made regarding widespread deployment of line sharing. The CLECs believe that all technical and operational issues have been resolved to the point that the Commission should order immediate implementation of line sharing.
- The parties have not agreed to the cost elements that should be considered in setting prices for line sharing. Neither have the parties agreed on final pricing for any such element. If the Commission orders line sharing, the parties have not agreed to a schedule for making central offices capable of supporting line sharing.
- If the Commission orders line sharing, the parties have not agreed to a schedule delineating when U S WEST will begin taking and provisioning orders for shared lines.

## VI. RECOMMENDATION FOR HOW TO PROCEED

The parties have different recommendations for how to proceed.

The CLECs believe that the Commission should order U S WEST to begin line sharing on the Terms and Conditions included with this report and the following additional terms:

(1) U S WEST must begin preparing all central offices in which data CLECs are currently collocated for splitter placement.

(2) U S WEST must have all such central offices service ready for line sharing (i.e. all necessary equipment installed and connected) by January 31, 2000.

(3) U S WEST must begin accepting orders for shared lines on January 31, 2000.

(4) U S WEST must begin provisioning shared lines on January 31, 2000.

(5) The recurring and non-recurring charges for a shared line should be no more than U S WEST currently includes for itself in its cost studies supporting the Megabit tariff.

(6) CLECs should not incur any collocation charges caused by U S WEST's desire to maintain control of the POTS splitter.

U S WEST believes that the technical test was too limited in scope to support a determination that wide spread deployment of line sharing is possible at this time. For example, the technical test was limited in terms of the number/diversity of loops tested and binder group impact. More importantly, the technical test did not address the impact of line sharing on U S WEST's voice service from a customer perspective or the capacity/capabilities of U S WEST's existing pre-order, order, provisioning, maintenance, and billing systems to handle line sharing. For this reason, U S WEST believes that a line sharing trial should be conducted in one or more central offices under "real world" conditions to ensure that all technical and operational issues

associated with line sharing deployment have been identified and all possible solutions to those issues have been fully evaluated. The trial also could be used to assess customer perception of line sharing and to further address educational requirements to avoid customer confusion. U S WEST is willing to conduct such a trial with all interested CLECs to better enable the parties and the Commission to evaluate the feasibility of wide spread line sharing deployment. The Commission could determine what, if any, further steps are necessary at the conclusion of the trial.

# ADMINISTRATIVE ISSUES AND ESCALATION FOR LINE SHARING IN MINNESOTA

## INTRODUCTION

After the first few initial all-carrier meetings, the participants created an Administrative Issues Team. The Administrative Issues Team's charter was to:

- handle discrete issues that fell outside the scope of the Operational Impact Team, Technical Testing Team, and the sub-teams;
- act as an oversight group;
- be a forum for issue escalation from the other teams.

The Administrative Issues Team discussed pricing issues and the ownership of and processes surrounding CLEC splitters. The team also designed and organized the final report to the Commission. Additionally, the Administrative Issues Team received reports and issue escalation from the Operational Impact Team, Technical Testing Team and the Network Architecture sub-team.

The Administrative Issues Team met weekly, plus on an as needed basis. There were two general meetings on October 5 and 11 before the process was broken down into discrete groups. The Administrative Issues Team met on October 14, 21, 22, 27, November 3 and 10. All of the active carriers had participants on the Administrative Issues Team including Covad, JATO, New Edge, NorthPoint, Onvoy, Rhythms, Sprint, and U S WEST. MPUC staff also participated on the Administrative Issues Team conference calls.

## ISSUES AND DISCUSSION OF ADMINISTRATIVE TEAM

### I. SPLITTER OWNERSHIP AND PROCESS

The splitter handles both the voice and data traffic, and therefore its ownership and placement in the central office must be coordinated between both the voice and data carriers. For the purpose of initial implementation, there was general agreement that the CLECs would be responsible for purchasing the splitters but would also have the option of U S WEST purchasing the splitters for the CLEC. U S WEST would install the splitters in one of three possible locations in the central office and U S WEST would maintain responsibility for maintenance and repair of the splitters. CLECs will be allowed to upgrade the splitters at their discretion. The Administrative Issues Team referred more detailed issues, such as maintenance, repair, and test access to the Operational Impact Team, the Network Architecture and Repair and Maintenance sub-teams. Carriers agreed that the issue of splitter placement in the central office may be revisited after initial implementation to explore additional options and configurations.

The process for deploying splitters in U S WEST central offices was also a topic of discussion in the Administrative Issues Team. U S WEST and the CLECs have agreed to supplement the collocation processes for splitter deployment in central offices where CLECs are not currently collocated. In order to augment existing CLEC collocation arrangements to add splitters, CLECs and U S WEST have tentative agreement to work with U S WEST on a project basis to prioritize those central offices. CLECs and U S WEST have not agreed upon the collocation intervals or pricing issues associated with this process. U S WEST has an action item to further research collocation intervals.

Carriers agreed to the need for establishing forecasting procedures and processes for splitters, office configuration, etc.

## II. PRICING

The Commission Order, at page 5, states that "USWC and interested CLECs will address and resolve the pricing issue in the 'terms and conditions' discussions required by the Order." This issue is addressed in the Decision Point List.

## III. REPORT STRUCTURE

The Administrative Issues Team was tasked with organizing and designing the format of the report. The carriers worked cooperatively and there was quick consensus around the format of the report.

## IV. ESCALATIONS/REPORTS

### 1. Lab and Field Trial

The Administrative Issues Team discussed the following issues as escalation from the Technical Testing Team:

- U S WEST proposed test plan and the applicability of ANSI standard T1E1.413, Annex E. The Technical Testing Team ultimately resolved this issue.
- The equipment configuration and number of end users for the field trial. The Technical Testing Team resolved these issues.

### 2. Network Architecture

The Network Architecture sub team agreed upon three possible configurations for splitter placement in the central office. To determine which configurations will be available in a particular central office, U S WEST must conduct a space review.

U S WEST agreed to research the possibility of inventorying central offices up front to give CLECs notice of the types of arrangements available. The specific network architecture agreed to between U S WEST and the CLECs is discussed more thoroughly in the Operational Impacts Report.

3. Operational Impact Team

The Administrative Issues Team discussed the following issues that came from the work of the Operational Impact Team:

- The Team agreed to limit Phase I of this process to issues regarding the addition of a CLEC DSL service to an existing U S WEST voice customer's loop;
- The Team agreed to limit Phase I implementation to end user loops that do not need conditioning;
- The team agreed that an end user's voice service will have to be briefly interrupted to provision CLEC DSL services, in the same manner that it is done for Megabit service today. The team also agreed to further investigate options to minimize this impact going forward;
- The Team agreed to using the standard unbundled loops provisioning interval- usually five days.

# THE OPERATIONAL IMPACTS OF LINE SHARING IN MINNESOTA

## INTRODUCTION

The line sharing Operational Impacts Team met to resolve operational and support systems issues related to line sharing. The group considered five general categories of OSS issues: (1) pre-ordering (e.g., pre-qualification of loops for ADSL compatibility); (2) ordering; (3) provisioning; (4) billing and (5) repair and maintenance. When necessary, the group relied on sub-groups to address specific issues.

The group based its work on a set of agreed-upon assumptions regarding how line sharing will work during its initial deployment. The group also agreed that OSS implementation should be divided into the following phases:

- Phase I implementation issues are those necessary to make basic line sharing work in the first instance.
- Phase II implementation issues are less important and therefore can wait to be resolved until after Phase I implementation is complete.
- Phase III implementation issues are those issues, such as how to change a customer from one DSL provider to another, that need to be resolved but are not critical to deployment.

This report is divided into five sections. The first section identifies what the group believed its charter to be based on the Commission's order in this docket. In Section II, the group describes how it operated and identifies its members. Section III sets out the specific issues that the group addressed. Section IV identifies the

assumptions the group made as the basis for addressing those issues. Section V is an executive summary of the areas where agreements were reached.

From time to time, this report will reference to the Decisions Point List that the parties submitted for the convenience of the Commission. There are five other exhibits to this report:

- Exhibit OSS-1 is a table identifying the individuals that participated in the Operational Impacts Team and each person's company affiliation and title.
- Exhibit OSS-2 is a "Gap Matrix" identifying potential gaps in the OSS required for line sharing and potential solutions to those gaps.
- Exhibit OSS-3 is a set of minutes from the group's meetings. These minutes record the ongoing discussions between U S WEST and the CLECs regarding operational issues surrounding line sharing. As such, they include many alternatives and ideas that were explored but may not represent the final conclusions of the team. This report, the Gap Matrix, the Terms and Conditions document and the Decision Point List reflect the team's final conclusions.
- Exhibit OSS-4 is the output from the subteam that designed the network architecture for the central office.
- Exhibit OSS-5 is a revised collocation application.

The Operational Impacts Team concluded that systems modifications can be made to support line sharing at U S WEST. The group and its sub-groups designed a basic process flow for handling line sharing operational issues. A network architecture sub-

group also agreed on a general plan for configuring CLEC and ILEC equipment in a central office to support line sharing.

## I. COMMISSION REQUIREMENTS

Ordering Paragraph 1 of the Commission's October 8, 1999 order in this docket requires USWC and interested CLECs to "work together collectively on a carrier-to-carrier basis to develop the terms and conditions under which USWC would provide line sharing to data CLECs in the event the Commission were to order it to do so." The order requires the parties to engage in this process in good faith.

## II. GROUP COMPOSITION AND OPERATION

Beginning on October 15, 1999, the line sharing Operational Impacts Team met every Friday at U S WEST headquarters in Denver from 9:00 a.m. to 1 p.m. Many U S WEST and CLEC individuals participated in part or in whole via telephone. At these meetings, the group developed the high level processes for line sharing and identified issues to be resolved related to those processes. The group assigned the task of resolving those issues to various individuals and/or sub-groups that worked on the issue during the week and reported back to the Operational Impacts Team at the following meeting.

By the end of the process, the team had created separate subteams to address three issues: (1) repair and maintenance flow; (2) the pre-qualification of loops for ADSL compatibility using U S WEST's pre-ordering system (IMA 4.2), design loop records ("DLRs") and/or the results of mechanized line tests; and (3) the technical configuration for deploying CLEC splitters in U S WEST central offices.

Exhibit OSS-1 to this report contains a table identifying the individuals that participated to some degree or another in the Operational Impacts Team meetings. The leader of the OSS team for U S WEST and for each CLEC is identified with an asterisk.

## III. ISSUES ADDRESSED BY THE OPERATIONAL IMPACTS TEAM

The Operational Impacts Team addressed the following general issues:

(1) What pre-order information do the CLECs require for shared lines? Are functions meeting those requirements currently available? If not, what will be required to make such functions available?

(2) What information will U S WEST require when a CLEC orders a shared line? Are functions meeting those requirements currently available? If not, what will be required to make such functions available?

(3) What process will U S WEST follow to provision a shared line? Will shared lines be provisioned through the design circuit process or through the POTS process?

(4) How will U S WEST and the CLECs coordinate repair and maintenance of a shared line?

(5) How will all of the shared line billing functions be handled by U S WEST?

(6) What U S WEST systems will be affected by line sharing? Are those systems capable of handling orders for shared lines? If not, what will it take to make those systems capable of doing so?

## IV. ASSUMPTIONS MADE BY THE GROUP AS THE BASIS OF ITS DISCUSSIONS

The group made the following assumptions about line sharing to facilitate its work:

(1) In Phase I, line sharing will be available only for (a) customers that already have U S WEST voice service at the time the customer orders CLEC DSL services, and (b) customers that have voice and data services from U S WEST and wish to convert data services over to a CLEC. Also during Phase I, a customer will be able to disconnect a CLEC data service without disconnecting or changing U S WEST voice service.

(2) In Phase II, customers that have voice service from U S WEST and ADSL from a CLEC will be able to convert their data service to U S WEST. Also, customers will be able to disconnect U S WEST voice and CLEC data services through one contact.

(3) In Phase III, U S WEST and the CLECs will address the following scenarios: (a) a customer that does not already have U S WEST voice service wants to order U S WEST voice and CLEC ADSL at the same time; (b) a customer wants to change CLEC ADSL providers on a U S WEST shared line; (c) a customer has U S WEST voice and CLEC ADSL and wants to cancel U S WEST voice while maintaining ADSL on the line (in this instance, the line would revert to a UNE). In the interim, U S WEST and the CLECs may be able to perform these functions via multiple discrete orders. Also in Phase III, customers will be able to transfer combined U S WEST voice services and CLEC ADSL services from one location to another through one contact.

(4) The CLEC requesting line sharing is collocated in a U S WEST central office and has capacity on the POTS splitter.

(5) Line sharing will be applicable only to simple line businesses or residences with flat-rated or measure-rated services the equivalent of 1FR, 1MR, 1FB or 1MB.

(6) An ISDN customer that wants DSL across a shared line would have to convert to one of the classes of service identified above first.

(7) No INP or LNP.

(8) Applicable current processes will remain in place and this group will only address process improvements material to line sharing.

(9) The POTS splitter will be located in the central office as close to the interconnection distribution frame and/or DS0 termination points as possible. The POTS splitter will not be located in a CLEC collocation space for purposes of Phase I implementation.

(10) U S WEST will inventory the POTS splitter and have knowledge of the points where connections will need to be made during the provisioning process.

(11) The POTS splitter data ports will be hard-wired to the CLEC collocation area.

(12) The CLEC will provide U S WEST with the POTS splitter circuit assignment information as part of its local service request for a shared line.

(13) Line sharing will only be available on U S WEST retail lines in Phase I. If a customer cancels or loses U S WEST voice service for any reason, the customer will also lose the CLEC's ADSL.

## V. EXECUTIVE SUMMARY OF AGREEMENTS REACHED

The parties agreed that U S WEST's systems can be modified to support line sharing. The parties further agreed that a reasonable estimate for the completion of systems and process work necessary to support the provisioning and maintenance of line sharing is some time in the first quarter of 2000, with a few points of note:

- Systems estimates have been developed without the benefit of completed detailed requirements and should be considered planning estimates only, subject to further clarification and refinement.
- Initial deployment would be based on a combination of automation and manual work steps. The parties have agreed to work together to manage line sharing implementation in a way that accommodates the market needs of the CLECs and recognizes the initial delivery issues of U S WEST.
- No viable billing solution will be available before second quarter of 2000. The parties have agreed to use back-billing to true up accounts from the start of service, if necessary.

The Operational Impact Team focused on designing a process that provisioned shared lines through U S WEST's POTS systems flow. The team identified eight systems gaps that will need to be addressed. The identified gaps are described on the Gap Matrix submitted as Exhibit OSS-2. The parties agreed to continue to work together with

Telcordia to explore lower cost, more expedient solutions to some of these gaps. There are no unresolved issues regarding this proposal.

The Operational Impacts Team also designed a repair and maintenance process for line sharing. For repair, U S WEST will remain responsible for voice service and physical line problems between the network interface device at the customer premises and the point of demarcation in the central office. The CLECs will remain responsible for data service problems. The parties have agreed to a mutual trouble shooting process, when required, to help isolate whether a particular problem is a voice service problem, a physical line problem or a data service problem. Each party will be responsible for maintaining its own equipment. The party that controls the splitter will be responsible for maintaining it.

A subteam from the Operational Impacts Team also agreed on the basic network configuration for a central office that will be capable of supporting line sharing. The splitters will be placed as close as possible to the interconnection distribution frame and/or CLEC DS0 (telephone line) terminations in the central office. The group also agreed to consider locating the splitter on or near the main distribution frame under certain conditions. U S WEST will pre-wire the splitters from the data ports to the CLEC collocation area to aid in the provisioning process. The basic network configurations agreed to by the subteam are attached as exhibit OSS-4. The subteam also agreed to revise the collocation application to capture requests for splitter placement. The revised application pages are attached as exhibit OSS-5.

Finally, the team identified the following customer education issues:

- Shared line customers will be informed that the customer should call U S WEST for problems related to its voice service. The customer should call its CLEC contact for problems related to its data service.
- Shared line customers will be informed that their data service is dependent on their voice service. If there is a problem with the physical line that brings down the voice service completely, the customer may also lose data services for some period of time.
- Shared line customers will also be informed that they will lose CLEC data services during Phase I implementation if U S WEST voice services across the line are cancelled or terminated for any reason.
- During Phase I implementation, customers will be informed that they must make separate arrangements with U S WEST and the CLEC contact for DSL services if the customer wishes to transfer both services to a new location.

# Minnesota

# Line Sharing Test:

## Technical Report

# INTRODUCTION

This report addresses the joint lab and field technical tests performed by, Covad, North Point, Rhythms, Sprint, and U S WEST to determine the impact of line sharing on voice service quality. The technical testing occurred in two parts. The lab testing took place beginning October 15, 1999 and going through October 29, 1999. The field test followed beginning on November 1, 1999 and going through November 5, 1999.

## I. RESEARCH METHOD EMPLOYED

The technical tests completed in response to the Minnesota Commission's October 8, 1999 order were done in two parts: laboratory tests were conducted in the U S WEST Lab in Littleton, Colorado, and field tests done at the U S WEST Orchard Central Office in Golden Valley, Minnesota.

The tests were based on an agreed to set of test procedures set out in the Test Plan document attached as Exhibit TEC-6.

The test plan is based on a subset of ANSI T1.413-1998 Annex E " POTS Splitter Requirements (normative)". This section applies to the characteristics of an individual POTS splitter.

The Test Plan also includes a subset of IEEE 820-1992 "Standard Telephone Loop Performance Characteristics" and applies to the end –to-end voice quality .

Additionally, the Metropolitan 911 Board requested that 911 tests be a part of the overall testing. This request was met via 911 tests done in the field testing segment.

The team performed several additional tests as described in the testing documents.

# I. EXECUTIVE SUMMARY OF TEST RESULTS

Lab Test Results

The technical lab testing was performed based upon the following parameters:

- As described in the Test Plan document,the tests were performed to validate that the CLECs line sharing equipment (central office splitters and customer filters) met an agreed to subset of the ANSI T1.413.Annex E requirements.
- The tests were performed on simulated facilities in a laboratory environment.
- A subset of IEEE 820-1992 loop tests were also performed as described in the Test Plan document.

The equipment tested conformed to the technical parameters of the ANSI T1.413 Annex E subset tested to, with minor variations. The team agreed that the variations are acceptable.

Field Test Results

Following the lab tests, a field test was initiated to insure that the laboratory results were replicated in a "real" world environment, and that voice degradation was tested. The field tests were based out of the Orchard (Golden Valley, MN) Central Office since most of the Co-Provider test partners had previously collocated DSL equipment in this U S WEST Central Office.

The field tests were done using "friendly" (voluntary, temporary, non-billed for) customer loops of business and residences served by the Orchard central office. The final list of loops consisted of 7 loops used by U S WEST customers, one loop identified by Covad, and one loop identified by Sprint. A total of 8loops were physically tested. The

first 4 loops tested were tested at a U S WEST business customer location. At that location, each separate line was tested with one co-provider's equipment. The remaining 4 loops were tested with each co-provider using all of their configurations on each loop. Several other loops were offered, but did not pass the loop qualification for DSL (e.g. load coils, loop length, etc.). The primary criteria for the field tests were:

- The same CLEC splitters and filters that were tested in the lab were tested in the field;
- Some of the field tests were developed based on a subset of the IEEE 820 requirements and are described in Section 2 of the Test Plan document;
- Some of the field tests were developed based on the U S WEST five point test for voice grade quality;

The results of the field tests identified above for the 8 loops tested fell within acceptable limits. It should be noted, however, that the field tests performed do not, and could not represent all of the diverse loop network experienced in a serving area:

- The team tested loops of approximately 7,800-17,400 ft were available and were tested (0-17,400 ft).
- The technical nature of this lab and field test did not test for customer perception of voice quality (a traditional Telcordia measurement) due to the constraints of the timeframes and the test parameters of this effort. However, the testers were able to listen to the dial tone and make 911 calls.

## II. SUPPORTING DOCUMENTATION

The following exhibits are provided as supporting documentation:

- Exhibit TEC – 1 A List of the Parties involved in the technical testing
- Exhibit TEC – 2 A listing of the participants of the Technical Team
- Exhibit TEC – 3 A Timeline of the Technical Testing Team work
- Exhibit TEC – 4 A List of the meetings held for the Technical Test Team
- Exhibit TEC – 5 A list of assumptions
- Exhibit TEC – 6 Test Plan
- Exhibit TEC – 7 Test Parameters
- Exhibit TEC – 8 Test Configurations
- Exhibit TEC - 9 Test Results.

## III. JOINT STATEMENT

All of the parties agree that the laboratory tests showed that the equipment tested in the lab conformed to the technical parameters described in the ANSI T1.413 Annex E with minor variations. The team agreed that the variations were acceptable.

All of the parties agree that the field tests results fell within the criteria of the standards tested.

**OPERATIONAL IMPACT TEAM**

| PERSON | COMPANY | TITLE |
|---|---|---|
| Jerry Shypulski | U S WEST | Wholesale Operations Process Mgr |
| Linda Miles | U S WEST | Process Specialist |
| Barbara Brohl | U S WEST | Director – Information Technologies/Regulatory Support |
| Jasmin Espy | U S WEST | Vice President – Wholesale Marketing |
| Kevin Stover | U S WEST | Information Technologies Analyst |
| Jon Ecklund* | U S WEST | Manager – Wholesale Systems |
| Mike Radcliff | U S WEST | Product Manager |
| Mary Retka | U S WEST | Director – Interconnection Planning |
| Jeanette Cain | U S WEST | Information Technologies – Senior IT Specialist |
| Dennis Pappas | U S WEST | Director – Interconnection Product Services |
| Linda Gale | U S WEST | Regulatory Manager |
| Jeff Thompson | U S WEST | Director – Information Technologies |
| Mark Nickell | U S WEST | Manager – Unbundled Loop |
| John Genovese | U S WEST | Manager – Network Architectures |
| Stover Lewis | U S WEST | Information Technologies – IT Specialist |
| John Boe | U S WEST | General Manager |
| Benjamin Campbell | U S WEST | Manager – Unbundled Loop, Sub Loop |
| Bill Campbell | U S WEST | Director-Wholesale Operations Process Management |

**OPERATIONAL IMPACT TEAM**

| PERSON | COMPANY | TITLE |
|---|---|---|
| Rob Van Fossen | U S WEST | Executive Director – Information Technologies |
| Michael West | Sprint | National Network Products Process Manager |
| Joyce Frost | Sprint | Competitive Operations Manager |
| Rob Hisle | Sprint | Senior Product Manager |
| Darin Liston | Sprint | Principle Program II Manager – Technology |
| Amy Cichowski | Sprint | National Systems Manager |
| Bob Vick | Sprint | Senior Product Development Manager |
| Joan Spivey | Sprint | Product Manager III |
| Jo Gentry* | Rhythms Links | Director – National Deployment |
| Ty Weston | Rhythms Links | Customer Services Manager |
| Steve Ewen | Rhythms Links | Systems Manager |
| Jill Wiesner | Rhythms Links | Project Manager – National Deployment |
| Andre Bachelet | Rhythms Links | Customer Services Manager |
| Tanya Van Court* | Covad | VP, Business Integration (formerly Director, Operations Staff) |
| Matt Wall | Covad | Business Analyst |
| Clay Deanhardt | Covad | Senior Counsel |
| Ron Marquardt | Covad | Mgr, Advanced Services |
| Brett Flinchum | Covad | Process Manager |
| Steve Moreno | Covad | Process Manager |
| Cliff Dinwiddie* | NorthPoint | Senior Manager LEC Relations |

**OPERATIONAL IMPACT TEAM**

| PERSON | COMPANY | TITLE |
|---|---|---|
| Caryn Anderson | NorthPoint | Senior Manager – LEC Relations |
| Christine Mailloux | NorthPoint | Product Development Manager |
| Susan McAdams* | New Edge Networks | Vice President – Government & Industry Affairs |
| Jim Milnor* | Onvoy | Operations Manager, Local Services |
| David Bryson* | JATO | Manager – Regulatory Affairs |

| Gaps | Applications Impacted | Specific Issue | Interim Solution[1] | Deployment Timeframe [1] | Long-term Solution [1] | Deployment Timeframe [1] |
|---|---|---|---|---|---|---|
| **Gap 1: LSR Modification & transmission of service order in system** | IMA | Need a mechanism to identify shared line order. (Meet point, "CFA, UCA UPR", CLEC ID, TN, ADSL indicator). | Proprietary LSR based on USW and DLEC agreement. This may be done via email, fax, or by faking IMA to use existing fields. A team of service order writers and OBF reps could accomplish this goal. | TBD | Make the long term changes through the OBF, such that, common rules sets are established | TBD |
| **Gap 2: Order writing (between ICADS and SOP)** | ICADS (creating automation). | Need business rules added to process shared-line orders, and to create SO. | No Interim Requirement | No Interim Requirement | Dependant on the standards within OBF establishing a rule set. | 4Q2000 |
| | Fetch-n-stuff and Data Arbiter | Enhancement to perform shared line facility availability queries. Later phases. | No Interim Requirement | No Interim Requirement | These changes are understood and can be worked independently from the OBF issues. | TBD |
| | SOPAD, SOLAR, RSOLAR (creating automation). | An Enhancement is necessary to accept shared line orders and manage the service order flow with automation between systems. | No Interim Requirement | No Interim Requirement | Establish transformation from the OBF forms to the Internal USOCs and FIDs. | 4Q2000 |

[1] All timeframes and solution definitions are estimates based on pending requirements work and information to be provided by 3rd parties. These estimates should be considered as planning estimates, and are based on the current understanding of systems capabilities assessed during the operational impact review. For this reason, the estimates may be subject to change.

| Gaps | Applications Impacted | Specific Issue | Interim Solution [1] | Deployment Timeframe [1] | Long-term Solution [1] | Deployment Timeframe [1] |
|---|---|---|---|---|---|---|
| | Manual SO Entry in SOPAD, SOLAR, RSOLAR | An Enhancement is necessary to accept shared line orders and manage the service order flow with a manual service order entry procedure. | Establish internal USOCs and FIDs for all systems within the Operational Support Systems environment. | 1Q2000 | See the automation items. | See the automation items. |
| **Gap 3: Connecting Point Inventory** | LFACS (All regions) | Current phase no impacts. Later phase, enhancements to allow for designated assignment locations (constrained loop assignment) and to reuse in place voice facilities. | Establish internal USOCs and FIDs. No substantial impacts to LFACS | 1Q2000 | Work any manual issues that may have been over sites. | 2Q2000 |

| Gaps | Applications Impacted | Specific Issue | Interim Solution [1] | Deployment Timeframe [1] | Long-term Solution [1] | Deployment Timeframe [1] |
|---|---|---|---|---|---|---|
| | SWITCH and APP | Enhancements to associate the customer's line with the connection points for the splitter, switch equipment, and ICDF, while reusing existing voice facilities. | Inventory the splitter in SWITCH as miscellaneous equipment. The resulting Manual assignments will fallout in the LPC. DLEC will pass ME FID on the LSR. | 1Q2000 in limited volume. | Remove all the manual workarounds. | 4Q2000 Telcordia offer. |
| | | | APP -- To simulate the transactions performed by the loop provisioning personnel to clear RMAs in SWITCH. This is required to support volume growth. | 2Q2000 – APP, Automates portions of the manual process that falls out out to the LPC. | | |

| Gaps | Applications Impacted | Specific Issue | Interim Solution[1] | Deployment Timeframe [1] | Long-term Solution [1] | Deployment Timeframe [1] |
|---|---|---|---|---|---|---|
| | WFA/C | Table work for proper dispatch and workflow. | No known issue. | No known issue. | Establish internal USOCs and FIDs. | 1Q2000 |
| **Gap 4: Repair Handling** | NSDB/WFA | Repair tickets will flow through. NSDB for the design portion of the service. | No Interim Requirement | | Line assignments are required as a part of NSDB for the design portion of the repair. | 1Q2000 |
| | LMOS | Repair tickets will flow through. LMOS for the POTS portion of the service. | No Interim Requirement | | Line assignments are required as a part of LMOS for the POTS portion of the repair. | 1Q2000 |
| **Gap 5: No interface between FOMS and WFA/DI** | FOMS and WFA/DI | Interface bring up and testing between FOMS and WFA/DI. | No Interim Requirement | | Test and turn up on the interface based on a WC rollout plan. Determination of of DLECs intended Service offering allows for a smoother implementation. | 1Q2000 (ongoing dependant on the DLEC Rollout. |

| Gaps | Applications Impacted | Specific Issue | Interim Solution[1] | Deployment Timeframe [1] | Long-term Solution [1] | Deployment Timeframe [1] |
|---|---|---|---|---|---|---|
| **Gap 6: Single product, multiple customer (need 2 billing records to be created from a single order.)** | Billing (CRIS) | Enhancements to bill the Co-Provider for shared line charges. Must have 2 CSRs that are related. | This is a Bulk bill solution (DLEC BAN per state). A DLEC will receive a bill that indicates that lines are shared, but to validate specific TN information requires that the CSR be reviewed.<br><br>Back billing will be used to bring accounts up to date if service is provisioned before the interim solution can be implemented. | 2Q2000 | The interim billing mechanisms need to be modified to show TN detail, but this impact is unknown. Conversions will be needed once the billing systems are modified. | TBD |
| **Gap 7: Need to identify accounts that are resold in IMA so that CLEC's cannot place orders against the line for line-sharing** | IMA | Identify resold accounts and reject line sharing orders as appropriate.<br><br>Similarly, identify line shared accounts and reject resale orders as appropriate. | CLECs will review CSRs prior to placing orders. U S WEST will also review CSRs as Service Orders are written. | | Accounts will have the Line Sharing USOCs and FIDs on the CSRs. The handling of the End Customers and CLECs would then be handled via Methods. | See gap 6.<br><br>Required concurrent with order automation long term solutions in Gap 2. |

| Gaps | Applications Impacted | Specific Issue | Interim Solution[1] | Deployment Timeframe [1] | Long-term Solution [1] | Deployment Timeframe [1] |
|---|---|---|---|---|---|---|
| **Gap 8: Identify a method to cause an entry to the DLECs loss report for disconnected service** | Loss and Completion | Depending on specific scenarios for a customer transfer between providers, modifications to the Loss and Completion reports must be made. | No Interim Requirement | | Pending the scenario work identified in the meeting 10/29/99 | TBD |

# Operational Impact Review
# November 12, 1999 Minutes

MEMO TO: Line Sharing Team

FROM: Barbara Brohl

DATE: November 19, 1999

SUBJECT: Minutes from the November 12, 1999 Meeting Between U S WEST, Rhythms, Sprint, Covad, Northpoint, New Edge Network, and Onvoy

SUBSEQUENT MEETINGS:

Face-to-face meetings will be held every Friday for the next four or five weeks (team progress will determine), at 1801 California, 23rd Floor, Executive Conference Room, from 9:00 to 1:00 (Denver time). For those attending remotely, the conference call number is (303) 633-2624 (reservation #13383586).

Line Sharing Team

Attendees:

U S WEST

| | |
|---|---|
| Jerry Shypulski | gshypul@uswest.com |
| Linda Miles | llmiles@uswest.com |
| Barbara Brohl | bbrohl@uswest.com |
| Kevin Stover | kstover@uswest.com |
| Jon Ecklund | jecklun@uswest.com |
| Mary Retka | mretka@uswest.com |
| Benjamin Campbell | bocampb@uswest.com |
| Bill Campbell | wmcampb@uswest.com |
| Rob Van Fossen | rvanfos@uswest.com |
| Jeanette Cain | jcain@uswest.com |
| Linda Gale | ligale@uswest.com |

Sprint

| | |
|---|---|
| Joyce Frost | joyce.a.frost@mail.sprint.com |

Rhythms

| | |
|---|---|
| Jo Gentry | jgentry@rhythms.net |
| Jill Wiesner | jwiesner@rhythms.net |
| Andre Bachelet | abachelet@rhythms.net |

Minnesota PUC

# Operational Impact Review
# November 12, 1999 Minutes

Covad

| | |
|---|---|
| Tanya Van Court | vancourt@covad.com |
| Matt Wall | mwall@covad.com |
| Clay Deanhardt | cdeanhar@covad.com |
| Brett Flinchum | bflinchu@covad.com |
| Stephen M. Moreno | smoreno@covad.com |

Northpoint

| | |
|---|---|
| Caryn Anderson | canderson@northpointcom.com |
| Uday Mathur | umathur@northpoint.net |
| Jorge Alcantara | |

Onvoy

| | |
|---|---|
| Jim Milnor | milnor@onvoy.com |

Also copies to:

U S WEST

| | |
|---|---|
| Jeff Thompson | jlthomp@uswest.com |
| Mark Nickell | mnickel@uswest.com |
| John Genovese | jgenove@uswest.com |
| Stover Lewis | slewis@uswest.com |
| John Boe | hboe@uswest.com |
| Jasmin Espy | jespy@uswest.com |
| Mike Radcliff | maradcl@uswest.com |
| Dennis Pappas | dpappas@uswest.com |

Sprint

| | |
|---|---|
| Michael West | michael.d.west@mail.sprint.com |
| Rob Hisle | Rob.E.Hisle@mail.sprint.com |
| Darin Liston | |
| Amy Cichowski | |
| Bob Vick | |
| Joan Spivey | |
| Dan Peer | |

Rhythms

| | |
|---|---|
| Steve Ewen | sewen@rhythms.net |
| Ty Weston | twesten@rhythms.net |

Minnesota PUC

| | |
|---|---|
| Ray Smith | ray@pucgate.puc.state.mn.us |
| Kevin O'Grady | kevin@pucgate.puc.state.mn.us |

# Operational Impact Review
# November 12, 1999 Minutes

Covad

| | |
|---|---|
| Ron Marquardt | |
| Brett Flinchum | bflinchu@covad.com |

Onvoy

| | |
|---|---|
| | jgulliks@means.com |

Northpoint

| | |
|---|---|
| Cliff Dinwiddie | cdinwiddie@northpointcom.com |
| Christine Mailloux | cmailloux@northpointcom.com |

New Edge Networks

| | |
|---|---|
| Susan McAdams | smcadams@newedgenetworks.com |

# Operational Impact Review
# November 12, 1999 Minutes

## TABLE OF CONTENTS

I. ISSUES TO REFER TO THE ADMINISTRATIVE TEAM ..... 5

II. ACTION ITEMS ..... 7

III. ASSUMPTIONS ..... 15

IV. Processing Impact and Data Needs ..... 17

A. Pre-ordering ..... 17
B. Ordering ..... 19
C. Provisioning ..... 23
D. Repairing ..... 24
E. Billing ..... 25

V. WORKING TEAM TIMELINE ..... 26

VI. GAP Analysis Discussion ..... 27

# Operational Impact Review
# November 12, 1999 Minutes

## I. ISSUES TO REFER TO THE ADMINISTRATIVE TEAM

10/15/99 Meeting

1. Does line sharing apply to the establishment of both new voice and new data – a new connect order establishing both at the same time?

   - Not in Phase 1.

2. What is the potential impact of customer service disruption on the removal of load coils?

   - It is not necessary to remove load coils for a Phase 1 implementation. Christine Mailloux stated that she needed to ensure that NorthPoint agreed. In a subsequent e-mail dated November 3, 1999, she stated that she had discussed these matters internally and could agree to these limitations on initial DSL orders as long as it helped move the process forward.

3. There is a need to develop a standard interval for ordering / provisioning line sharing.

   - The interval will mirror the unbundled loop interval of 5 days.

4. Review the Y-Splice / Half Tap method which does not require the voice to be pulled down.

   - It is not an issue. After some investigation, Clay Deanhardt has discovered that this is not being used in any ILEC as far as we know. This still needs to be run by Christine Maillous in NorthPoint as identified in Item # 6 in the 10/29/99 Action Items.

10/22/99 Meeting

1. There is a need for forecasting information for splitters, office configuration, etcetera.

   The Administrative Team is still working this issue. It has identified that there are three areas that need to be addressed.
   Catch Up (existing deployed Central Offices)
   - Identify what the data CLECs want to put into the COs now.
   - Identify what is forcasted for next year, to ensure proper space management.

   Going Forward

# Operational Impact Review
# November 12, 1999 Minutes

- The collocation application has a forcast requirement.
- This takes on a greater criticality and the data CLECs will ensure its use.

Long Term Plan

- The Interconnection Agreements should contain a clause requiring these types of forecasts be provided on a yearly basis.

2. Define "Splitter-virtual-collocation."

   A document defining "pseudo-virtual" was developed by Clay Deanhardt and e-mailed to U S WEST. U S WEST will review it and provide feedback to Clay. There may be OSS issues, and so the concept will be discussed at the 11/9/99 morning conference call.

10/29/99 Meeting

1. None

11/5/99 Meeting

1. On a conversion from retail to UNE-C (unbundled loop and switch), where the end-user customer wishes to have the DSL provided by a DLEC in a Line Sharing configuration.
   - Once the CLEC takes over the loop, U S WEST can no longer be in a Line Sharing scenario.
   - If the CLEC chooses to share the data frequency with a DLEC, the voice CLEC could bridge a DSLAM into the configuration through an intermediate frame, and then bridge the loop and switch port together inside the collocation in conjunction with a splitter if it wants to add the data piece.

# Operational Impact Review
# November 12, 1999 Minutes

## II. ACTION ITEMS

10/15/99 Meeting

| Assigned to | Due Date | Action Item | Result |
|---|---|---|---|
| USW / Kevin Stover | 10/22/99 | 1. U S WEST will check out the relationship between UDC / DLC (is bridge tap included in the total length?). | 10/22/99<br>• UDC is included under pair gain<br>• Bridge Tap is reported by total length and is included in the total loop length.<br>Closed for Release 1.0 |
| USW / Kevin Stover | 10/22/99 | 2. U S WEST will check out whether it can identify the number of load coils. | 10/22/99<br>• The number of load coils is available, however, U S WEST is still researching whether the placement of load coils is available. |
| USW / Kevin Stover | 10/22/99 | 3. U S WEST will check out what is included in the digital disqualification requirements. | 10/22/99<br>• See number 1 regarding UDC. |
| | | 4. U S WEST and the DLECs will create a sub-team and refer to it the task of determining impacts to the LSR for additional ordering data fields,<br>(E.g., the additional connection points: TN; NC/NCI field used for request type; and the CFA-like connections – splitter) | 10/22/99<br>• U S WEST has begun investigating this internally. |
| DLECs | | 5. DLECs will verify that the splitter tie cables will be pre-provisioned. | There is a conference call set up on 11/9/99, from 8:30 to 1:00, to discuss the network |

# Operational Impact Review
# November 12, 1999 Minutes

| | | | |
|---|---|---|---|
| | | | architecture. |
| USW / Jerry Shypulski | 10/22/99 | 6. U S WEST will identify process flows / steps associated with Phase 1 installation processes. (for next week's meeting) | 10/22/99<br>• Included in the packet. |

10/22/99 Meeting

| Assigned to | Due Date | Action Item | Result |
|---|---|---|---|
| Entire Line Sharing Team | On-going | 1. Spend the last 1/2 hour of each meeting blocking out a high-level plan for tasks and deliverables over the course of this drill. | |
| Admin Team | 10/28/99 | 2. Define "Splitter-virtual-collo." | 10/29/99<br>Placed in the Administrative Referrals page. |
| USW / Jeanette Cain | 10/29/99 | 3. What does "next day" completion report mean? And, what is the cutoff to get it the "next day"? | 10/29/99<br>Complete<br>• If the service order is completed before the batch systems begin their processing (generally 9:00 or 10:00 p.m.), it will be reflected in the Completion Report by noon on the business day following the date of completion. |
| USW / DLEC Subteam | 10/25/99 Call<br><br>11/12/99 | 4. With pre-order information as described on 10/15/99, will a DLR be necessary?<br>5. Compare pre-order information | 10/25/99<br>The conference call was held between USWC and DLECs. |

# Operational Impact Review
# November 12, 1999 Minutes

| | | | |
|---|---|---|---|
| | Document | differences between IMA 4.2 and that described on 10/15/99, to the data provided on a DLR.<br>6. Is MLT available in pre-order and how does an MLT compare with a DLR? | 11/5/99<br>4. Bill Campbell will document the outcome of the call.<br>5. Bill Campbell will document the outcome of the call.<br>6. MLT is not currently available in pre-order. (It must be identified as a gap for Phase 1.5) Jerry Shypulski will provide documentation on MLT comparision to DLR for inclusion in Bill Campbell's document. |
| USW / Kevin Stover | 11/12/99 | 7. On a line with Megabit™, are the RSAs able to run an MLT test on the voice portion of the loop? | |
| USW / Kevin Stover, Jerry Shypulski | 11/12/99 | 8. Review and propose a repair process and line record process.<br>• Investigate Megabit™ trouble-shooting process<br>• ID what testing is available<br>• MLT | There is a conference call set up on 11/11/99, from 8:30 to 1:00, to discuss the repair processes. |
| USW / Kevin Stover, Jerry Shypulski, Linda Miles | 10/29/99 | 9. Review billing processes and ID issues. | 10/29/99<br>Complete (See Process Flows dated 10/29/99) |

# Operational Impact Review
# November 12, 1999 Minutes

| | | | |
|---|---|---|---|
| USW / Kevin Stover | 10/29/99 | 10. Create a presentation outlining data differences between the functions. | 10/29/99 Complete (See Spectrum Unbundling (Line Sharing) doc) |

10/29/99 Meeting

| Assigned to | Due Date | Action Item | Result |
|---|---|---|---|
| Linda Miles | 11/12/99 | 1. Identify the process for the return of:<br>• Held Orders<br>• Jeopardy Notifications<br>• FOCs<br>• Rejects | |
| Barb Brohl | 11/5/99 | 2. Create an acronym list | 11/9/99 Provided with the 11/5/99 Minutes Package |
| Dennis Pappas | 11/12/99 | 3. Identify what CTAS can be used for, and does it have any application in a line sharing environment? | |
| Mark Nickell / Mike Radcliff | 11/12/99 | 4. How should U S WEST deal with accounts that are resold, converted to UNEs, ported out, etc.<br>• Existing - can we line share if the customer is resold, ported out, contains UNEs, etc.?<br>• Future - can we resell voice, port out a customer, convert to UNEs, etc. is already line shared? | |
| DLEC / USWC Subteam | 11/12/99 | 5. Subteam to discuss Assumption #3, and create a matrix of pitfalls. (e.g., )<br><br>LNP \| UNE \| etc. \| | Rolled into Action Item #2 dated 11/5/99. |

# Operational Impact Review
# November 12, 1999 Minutes

| | | | |
|---|---|---|---|
| | | Cust \| X \| \| \|<br>Exp. \| \| X \| \|<br>\| \| \| \| | |
| Cliff Dinwiddie | | 6. Check with Christine Mailloux on the Y-Splice / Half-tap issue. | |

11/5/99 Meeting

| Assigned to | Due Date | Action Item | Result |
|---|---|---|---|
| USWC | 11/12/99 | 1. Determine if U S WEST create a "loss" report for the data CLECs when the end-user migrates his/her voice service from U S WEST to a CLEC:<br>• Retail to UNE-C | |
| Jerry Shypulski / DLECs | 11/10/99 draft to the DLECs by noon 11/12/99 USW & DLECs will review | 2. Need to more fully flush out the voice customer-affecting experiences in the "End-User Behavior Matrix Proposal" (p.6 of the Line Sharing 11/5/99 powerpoint document)<br>• Need to add DNP and Disconnect | |
| USWC / DLECs | 11/12/99 | 3. Identify and resolve joint repair processes<br>• MLT<br><br>(see also 10/22/99 Action Item # 8) | 11/11/99<br>Joint Meeting was held - * does the outcome need to be documented? |
| Jon Ecklund / DLECs | 11/8/99 draft to the DLECs by end of day 11/12/99 | 4. Fill out the last two blank columns of the matrix shared by Covad. | 11/9/99<br>Jon Ecklund filled out the last two blank columns and provided the document to the joint team on |

# Operational Impact Review
# November 12, 1999 Minutes

| | | | |
|---|---|---|---|
| | USW & DLECs will review | | 11/12/99. |
| USWC / DLECs | 11/12/99 | 5. Between the 5th and the 12th of November, all companies will attempt to address the first two blank columns of the matrix shared by Covad.<br>• The companies agreed to change the title "Interim Solution" to "Workaround" | 11/12/99<br>The companies addressed the first two blank columns - see the matrix for the outcome. |
| Clay Deanhardt | 11/10/99 end of day | 6. Prepare first draft of the Final Report<br>• Up-front objective introduction<br>• Including the product frame-work, assumptions, & minutes<br>• List of attachments / matirices. | 11/11/99<br>Clay Deanhardt provided the initial draft to the joint team on 11/12/99, where it was reviewed and modified. |

11/12/99 Meeting

| Assigned to | Due Date | Action Item | Result |
|---|---|---|---|
| Linda Miles | 11/12/99 | 1. Identify the date of the next OBF meeting and change management process / timelines | Schedule<br>The next meeting is next week – the week of 11/15/99 in Chicago.<br>The following one is scheduled for February '00.<br>Process<br>Must have the information to the committee 3 to 4 weeks in advance. Can walk issues in only if they are fully defined. |

# Operational Impact Review
# November 12, 1999 Minutes

| | | | |
|---|---|---|---|
| | | | If there is a full interim between the two official meetings, issues can be reviewed. |
| Linda Miles | 11/15/99 (if possible) | 2. How long does it take to:<br>• Get USOCs and FIDs<br>• Establish edits for USOCs and FIDs<br>• Load the tables with USOCs and FIDs | |
| Kevin Stover | 11/16/99 | 3. What is different about a bridge lift versus a splitter and can it be used here? | |
| | 11/16/99 | 4. How will U S WEST show trouble history through IMA for a line shared line? | |
| Mary Retka / Jerry Shypulski / Mike Radcliff | 11/16/99 | 5. Can the splitter be the point of demarcation? (3 splitter location scenarios) The DLECs want test capability at the MDF side of the splitter – at the point where the cable goes into the splitter.<br><br>The DLECs will agree that the demarcation be at the collocation side of the splitter => provided that the DLECs have testing access presence at the MDF side of the splitter and at the collocation side of the splitter.<br><br>• The repair process will address:<br>➢ Coordinated testing processes<br>➢ Acknowledgement / communications<br>• The product must address: | |

**Operational Impact Review**
**November 12, 1999 Minutes**

| | | | |
|---|---|---|---|
| | | ➢ The definition of collocation must define test access and demarcation. | |

# Operational Impact Review
# November 12, 1999 Minutes

## III. ASSUMPTIONS

10/15/99

1. Phase 1 – existing customer / line.
2. Phase 2 - new customer / line.
3. Phase 2 - CLEC provides voice and DLEC provides data.
4. Phase 1 – CLEC is collocated in the central office and there is capacity on the POTS splitter.
5. Phase 1 – Applicable classes of service are single line[1] business or residence, either flat-rated or measured-rated (or the equivalent of):
   - 1FR
   - 1MR
   - 1FB
   - 1MB
6. Phase 1 – ISDN customer would have to convert to one of the applicable classes of service prior to line sharing.
7. Both phases – No INP or LNP.
8. Both phases – Coordinated hot cuts options => the same options as today except for dispatch out.
9. Both phases – Current processes will remain in play and if there are process improvements that need to take place with respect to the unbundled loop, they will be addressed through unbundled loop process improvement teams, rather than in the line sharing team (unless it is material to line sharing).

10/22/99

1. The splitter is in the central office, not in the collocation cage, and is as close to the MDF as feasible. (Access to the device is not a current concern.)
2. U S WEST inventories the device and has knowledge of connection points (splitter reference; TN COE reference; CFA-like reference - with naming standards).
3. The splitter data out port is hard-wired to the collocation appearance.
4. The DLEC inventories the splitter and passes the assignment as part of the LSR (local service request).

10/29/99

1. Each provider must have knowledge of the other for:

[1] Instead of single line - could we say simple line? This ensures that we don't preclude residences or small businesses with more than one line.

# Operational Impact Review
# November 12, 1999 Minutes

- Repair

2. Line Sharing is only available on U S WEST retail lines.
3. If there is a deviation from the U S WEST retail line scenario, it is understood that the DSL portion of the loop will be disconnected and the DLEC will make the appropriate business decision (e.g., reconnect via a separate unbundled loop if facilities are available, if desired).
   - T&F (transfer of service to and from locations)
   - LNP (local number portability)
   - DNP (disconnect for non-payment)
   - Etc.

11/5/99

1. The MPUC must be made aware that there are definite voice customer-affecting situations and this will be done through the Final Report.
2. U S WEST can support the migration scenario when an end-user has voice and data from U S WEST and wishes to convert data services over to data CLEC. Assumptions: there would have to be physical movement from the retail DSLAM to the DLEC DSLAM.

# Operational Impact Review
# November 12, 1999 Minutes

## IV. Processing Impact and Data Needs

### A. Pre-ordering

| Processing Functional Area | Tasks | Sub-Tasks | Participants/Data |
|---|---|---|---|
| Pre-Ordering | Define data needs to determine if a loop is capable of line sharing. | | |

**INPUT**

Telephone Number (Phase 1 initial rollout – assume existing voice customer)

**OUTPUT**

Total Loop Makeup (actual loop makeup – not theoretical)

- Length
- Gauge
- Presence of load coils
- Number of repeaters
- Location, quantity, & individual length of bridge taps
- Presence of UDC / DAMLS

IMA 4.2 Release will provide:

- Telephone number or address
- Total cable length (no individual gauge sections)
- Sum of the length of all bridge taps
- Presence of DLC
- DB loss
- Presence of load coils
- Missing segments are identified

Deltas between desired total loop makeup and IMA 4.2 release

- Gauge of cable
- Presence of repeaters (nice to have)
- Presence of UDCs
- Location, quantity, & individual length of bridge taps
- DLC type

**Operational Impact Review**
**November 12, 1999 Minutes**

- Quantity of load coils (nice to have)

# Operational Impact Review
# November 12, 1999 Minutes

## B. Ordering

| Processing Functional Area | Tasks | Sub-Tasks | Participants/Data |
|---|---|---|---|
| Ordering | Define additional data needs to be populated on the LSR to properly order line sharing. | Begin preliminary work with Standards Bodies (OBF, ECIC) for forms modification. | |
| | Define order scenarios and identify process and system impacts for them. | <u>New Service</u><br>Establishment of new service (both voice and data) on a shared line.<br><br>** NOT APPLICABLE FOR PHASE 1 INITIAL ROLLOUT | |
| | (A) | <u>Changes to existing service</u><br>• End-user has voice from U S WEST and wishes to establish data services from data CLEC. (PHASE 1)<br><br>• End-user has voice and data from U S WEST and wishes to convert data services over to data CLEC. (PHASE 1.5) (See Assumption # 2 dated 11/5/99) (PHASE 1)<br><br>• End-user has voice from U S WEST and data from data CLEC and wishes to convert data services over to U S WEST. (PHASE 1.5) | |

# Operational Impact Review
# November 12, 1999 Minutes

| Processing Functional Area | Tasks | Sub-Tasks | Participants/Data |
|---|---|---|---|
| | (B) | • End-user has voice from U S WEST and data from data CLEC and wishes to disconnect voice portion of the loop. (PHASE 2.0)<br><br>• End-user has voice from U S WEST and data from data CLEC and wishes to disconnect data portion of the loop. (PHASE 1.0)<br><br>• End-user has voice from U S WEST and data from data CLEC and wishes to move from one location to another (T&F) (PHASE 2.0) | |
| | | <u>Disconnect</u><br>• End-user has voice from U S WEST and data from data CLEC and wishes to disconnect the entire loop. (PHASE 1.2) | |

## ORDER TYPES

- To establish new data service on an existing voice account – "C" order.
- To disconnect data service only on an account that is shared – "C" order.

## INPUT

- Use of the LSR (local service request), EU (end user), and other forms.
- New Request Type

# Operational Impact Review
# November 12, 1999 Minutes

- Telephone number
- Unique reuse of the NC/NCI field
- Connecting points
  - CFA-like
  - Location of DLEC tie-down
  - OE
- FDT (FOC)

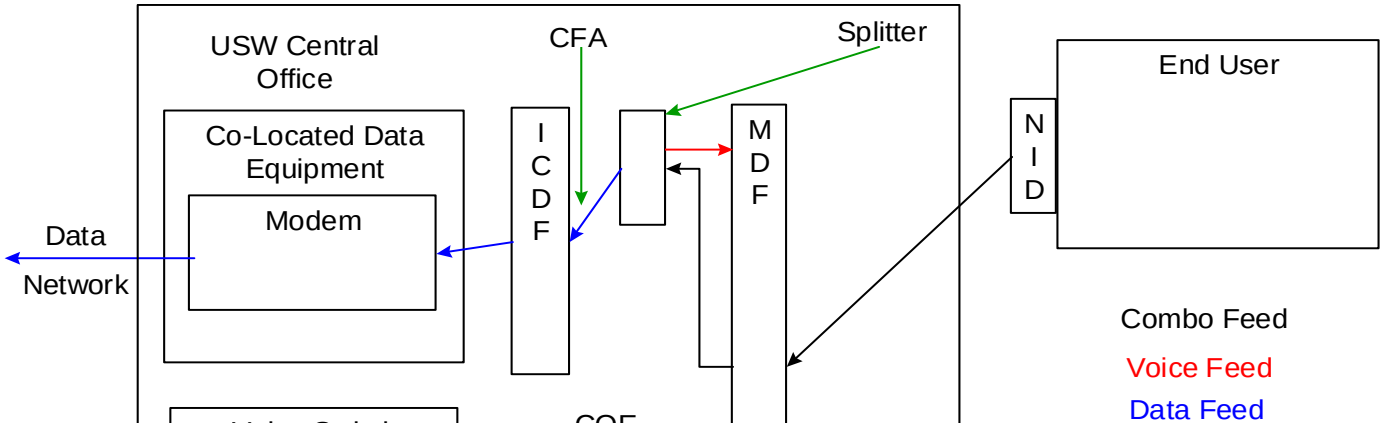
## ORDER SCENARIOS

- Establish new data service on an existing voice line.
  1. Convert one of the applicable Classes of Service (1FR, 1MR, 1FB, 1MB) to line sharing on a "C" order.
  2. Input required data; e.g. telephone number, etc.
  3. Dispatch to transfer service to the DLEC.
  4. Work completion notification (positive notification desired).
  5. Work records posted.
  6. End

- Disconnect existing data service on a shared line.
  1. End-user customer calls to disconnect data service.
  2. "N"-like order ("C" order with new-connect characteristics).
  3. "C" order to re-establish voice service but not to remove tie cables.
  4. Need to maintain as available for reassignment an appearance to the ICDF and tie pair to the splitter and maintain ownership of the splitter.

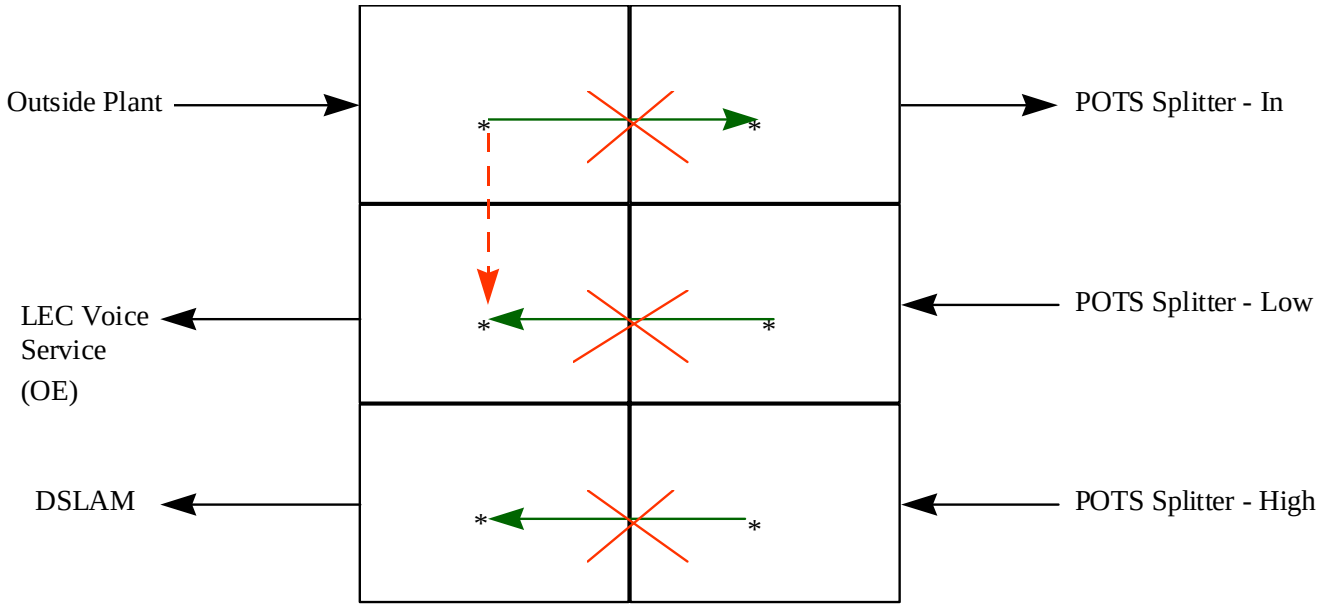
- Field select in LSR will not reject back to co-provider, but will RMA to ISC to be manually handled.

The following diagram is the one that Kevin Stover drew on the board.



# Operational Impact Review
# November 12, 1999 Minutes

The following diagram is the one that was drawn on the board by Tanya Van Court.




Line Sharing Connection

Disconnection of the data service and reconnection of only the voice service

# Operational Impact Review
# November 12, 1999 Minutes

## C. Provisioning

| Processing Functional Area | Tasks | Sub-Tasks | Participants/Data |
|---|---|---|---|
| Provisioning** | Determine additional assignment locations (voice/data splitter, switch COE, data CFA, and voice facilities re-use. | | |

** Not specifically depicted in the above table is the requirement to work with and negotiate requirements, costs, and timelines from third-party vendors, e.g., Telcordia and Lucent, to which many of these systems belong.

**Assumptions**

- Unique USOC(s) or FID indicator(s) for line sharing
- Some indicator to indicate service type
- Indicator of provider
- Connecting points and how they are identified
- Circuit identifier
- Retain OE reference
- Conditioning data
- FOC

# Operational Impact Review
# November 12, 1999 Minutes

**D. Repairing**

| Processing Functional Area | Tasks | Sub-Tasks | Participants/Data |
|---|---|---|---|
| Repairing | Define repair scenarios and identify process and system impacts for them. | End-user has voice from U S WEST and data from data CLEC.<br><br>End-user experiences trouble on the voice product.<br>End-user experiences trouble on the data product.<br>End-user experiences trouble on both voice and data products. | |

Manage end-users' needs.

If end-user calls about repair
    If voice trouble
        Normal TN repair process
    Else
        If data trouble
            Soft referral** of the data trouble to the DLEC

If DLEC reports trouble
    Will provide the associated TN (even though the trouble is with data)

Identify if the line is shared and if so, there will be M&Ps developed to manage the referral - possibly develop a joint script.

Line records may be an issue (single / multiple occurances)

** Soft referral based on provider ID

# Operational Impact Review
# November 12, 1999 Minutes

## E. Billing

| Processing Functional Area | Tasks | Sub-Tasks | Participants/Data |
|---|---|---|---|
| Billing (includes end-user and wholesale account records) | Determine cross-reference requirements necessary to ensure proper ordering capabilities. | Identify data required to denote that the end-user is utilizing a shared line. | |
| | Identify additional ordering and billing codes necessary to denote Line Sharing on the account and proper billing. | Begin preliminary work with Standards Bodies (OBF) for development of ordering and billing codes. | |

**Assumptions**

- See "provisioning slide"
- See new CPNI guidelines
- Single / multiple set of guidelines
- Methods & procedures issues that cross business units
- Charges & rates
- Direct single product toward two bills

# Operational Impact Review
# November 12, 1999 Minutes

## V. WORKING TEAM TIMELINE

| Target Start-date | Target End-date | High-Level Task |
|---|---|---|
| 10/15/99 | 10/22/99 | Understanding of current environment. |
| 10/22/99 | 10/29/99 | Determination of line sharing environment functional view.<br><br>Draft Phase 1 processes. |
| 10/29/99 | 10/29/99 | GAP Analysis |
| 10/29/99 | 11/9/99 | Initial GAP Review DRAFT |
| 10/29/99 | 11/16/99 | GAP Management Plan, with Proposed Resolutions and Timelines & Cost. |
| 10/29/99 | 11/16/99 | Development of the final report. |

** DRAFTS should be shared each week.

# Operational Impact Review
# November 12, 1999 Minutes

## VI. GAP Analysis Discussion

Jon Ecklund reviewed the "Spectrum Unbundling (Line Sharing)" power point presentation dated 10/29/99 with the team. During the review, several GAPS were discussed and labeled.

Line Sharing Service Order and Provisioning Flow (p. 5)

| GAP Label | Systems Implicated | Size of GAP |
|---|---|---|
| G1 - LSR Modifications | The box around IMA, ICADS, Fetch-n-Stuff / Data Arbiter | Medium to High |
| G2 - Order Writing & Flowthrough | The arrow between ICADS and SOP | |
| G3 - Connection Point Inventory | The box around LFACS, SWITCH, and FOMS | High |
| G4 - Repair Handling | The box around LMOS and NSDB | |
| G5 - Interface Growth | The arrow between FOMS and WFA-DI | |
| G6 - Single Product / Multiple Customer Billing | The box around CRIS "Billing" | |

Line Sharing Spectrum Repair System Flow (p. 6)

| GAP Label | Systems Implicated | Size of GAP |
|---|---|---|
| G1 - (if line sharing repair follows a POTS flow) | The box around RCE, LMOS FE, and LMOS-HOST | |
| G2 - (if line sharing repair follows a Designed flow) | The box around WFA-DI and WFA-C | |

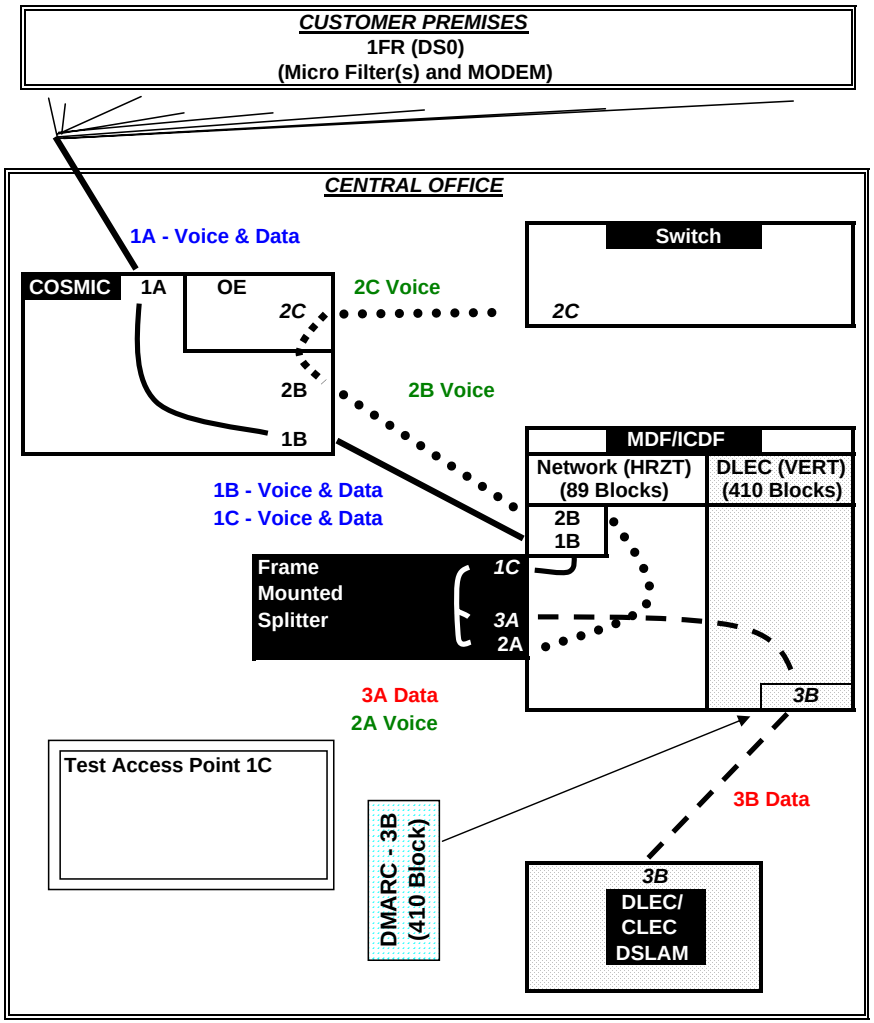
# Operational Impact Review
# November 12, 1999 Minutes

Jon Ecklund reviewed the "GAP Document" addressing both long term solutions / timelines and interim workarounds / timelines.

# COLLOCATION - LINE SHARE - OPTION B

November 17, 1999

## *Frame Mounted Splitters (see separate Rack Mounted document)*




**DIAGRAM**

Frame Mounted Splitter. U S West Engineering would have the discretion of using Frame Mounted Splitters in a space limited situation in lieu of Rack Mounted Splitters based on individual office conditions.

**CONNECTIONS**

1. A single 16 line Frame Mounted Splitter is mounted on the horizontal side (MDF example) in lieu of an 89 type block.
2. Sixteen trail pairs are redirected from their existing horizontal terminations through the Frame Mounted Splitter (1B).
3. DS0 voice signals are redirected from the Splitter back to the COSMIC/OE/Switch (2A-2B).
4. Data signals jumpered to existing 410 block(s) (DMARC) on the vertical side of the MDF (3A-3B),
5. Data signals are carried back to a DLEC's DSLAM equipment on existing cable (3B).

**ADVANTAGES**

1. Elimination of a separate Splitter Bay.
2. Reduction in the number of cross connects and cabling.

**DISADVANTAGE**

1. A Rack Splitter bay can handle 512 to 1,344 lines, it would take between 32 and 84 Frame Mounted Splitters to provide the same service. The footprint of the bay would be 2 square feet, the MDF/ICDF surface area taken up by the Frame Mounted Splitters would be approximately 114 to 299 square feet.
2. Mounting Frame Splitters on ICDF/MDF frames would limit the expansion/growth of those frames.
3. Equipment management is facilitated with the use of Rack Mounted Splitters: a single self contained bay will serve up to 1,344 DS0's, it would take 84 individual Frame Mounted Splitters installed at open block locations to provide the same capacity.
4. Facilitates the management of splitters dedicated to specific DLEC's.
5. Existing pairs going from the ICDF to the DLEC and from the COSMIC to ICDF/MDF could be utilized.

**OPEN ISSUES**

1. Switched data base impact and methods and procedures.
2. A Switch version of the APOT form would have to developed.
3. Specific hardware review to ensure meets standards.
4. Specific Test and Turn-Up procedures will have to be developed.
5. Review of this drawing by the Core Team for concurrence of assumptions and analysis.

## ADDITIONAL CO PROVIDER REQUESTS

**Line Sharing Requirements** *(by central office)*

Line Sharing requested Yes ☐ No ☐

Number of Splitters to be installed *(lines)* _____

**Line Sharing Forecasted Requirements**[1] *(in lines)*

| Year 1 | Year 2 | Year 3 |
|---|---|---|
| _____ | _____ | _____ |

**Splitter Choice One**
*(please select one option)*

☐ ICDF Mounted
☐ Rack Mounted

Will the CO-Provider order and deliver the splitter to U S WEST? ☐ Yes ☐ No

Does the CO-Provider want U S WEST to order the splitter on the CO-Providers behalf? ☐ Yes ☐ No

**Splitter Type A** *(please use approved product list)*

Manufacturer _____
Model # _____
Card Capacity per shelf (please indicate the quantity) _____
Splitters per Card (please indicate the quantity) _____

**Splitter Type B** *(please use approved product list)*

Manufacturer _____
Model # _____
Card Capacity per shelf (please indicate the quantity) _____
Splitters per Card (please indicate the quantity) _____

**Splitter Choice Two**
*(please select one option)*

☐ ICDF Mounted
☐ Rack Mounted

Who will provide the splitter? ☐ U S WEST ☐ CO-Provider

**Splitter Type A** *(please use approved product list)*

Manufacturer _____
Model # _____
Card Capacity per shelf (please indicate the quantity) _____
Splitters per Card (please indicate the quantity) _____

[1] Line Sharing Forecast information is used by U S WEST to assist in space planning

**Line Sharing Requirements (*continued)***

**Splitter Choice Two** (*continued)*

**Splitter Type B** *(please use approved product list)*

Manufacturer _____

Model # _____

Card Capacity per shelf (please indicate the quantity) _____

Splitters per Card (please indicate the quantity) _____

**Shelf Requirements**

_____ W x _____ H x _____ L

**Cable Requirements**

Use existing DLEC/CLEC cable to the collocation site ☐ Yes ☐ No

What is the pair count? _____

Are you installing a new cable? ☐ Yes ☐ No

Please indicate the cable size _____

Cable Type _____

Are you installing a shielded cable?[2] ☐ Yes ☐ No

Special Cabling Requirements

_____

_____

[2] CLEC-provided shielded cables must be sent to the US West Warehouse and labor for the installation of the cable is determined utilizing the BFR. Process.

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| **Technical Testing** | | | | |
| 1. What standards should be tested to during the lab and field tests? | Yes. | Subsets of ANSI T1.413 1998 Annex E and IEE 820 1992. | | |
| 2. What additional criteria should be applied to lab and field tests? | Partial. | The parties agree that no additional criteria were necessary for the lab tests. The parties also agreed to apply power loss, loop current, noise and balance tests to test voice service during the field trial. | The CLECs do not agree that spectrum management (binder group integrity) is an issue in this proceeding. ADSL equipment that fits within the power spectral density masks defined in the ANSI T1.413 standard is designed to work in a binder group that contains a variety of digital and analog services. The FCC and the telecommunications industry has agreed that equipment meeting ANSI T1.413 standards is acceptable for deployment in the telephone network. All the CLEC ADSL equipment deployed in U S WEST territory has power spectral density masks that meet ANSI T1.413 standards. Upon demand from U S WEST, and prior to the initiation of the technical tests, the CLECs provided U S WEST with the power spectral density mask information demonstrating that the CLEC ADSL equipment complies with the ANSI T1.413 standard. U S WEST appeared to do nothing | U S WEST proposes that additional testing be conducted prior to deploying line sharing. U S WEST is recommending this additional testing based on the following:<br>• Spectral management and customer perception of voice quality issues could not be adequately addressed due to the limitations of the technical test in Minnesota.<br>• The controlled conditions, scope and/or duration of this limited test could not explore potential spectrum interference with the shared voice signal because it did not test enough diverse loop conditions.<br>• Additional testing is needed to validate binder group issues when it comes to the effects of robust upstream and downstream data paths on other services, specifically those service |

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| | | | with that information, and the CLEC technical team never heard any more about this issue from U S WEST.<br><br>U S WEST's expressed concerns regarding the Telcordia subjective voice tests and loop diversity issues are irrelevant. U S WEST and the CLECs jointly agreed to the test plan. The Telcordia subjective voice tests were neither appropriate nor feasible for this technical test. U S WEST has publicly stated that it has more than 50,000 ADSL shared lines deployed across its territory. Those 50,000 shared lines provide the best evidence that voice quality in a diverse loop plant across shared lines is acceptable. In addition, the Technical Test Team tested 911 service across shared lines and found that it worked without any problem.<br><br>In addition, U S WEST has never established that its Megabit equipment either complies with any of the relevant standards or has been subjected to the spectrum management, subjective voice quality or diverse loop tests that U S WEST belatedly contends were not conducted here. The CLECs asked | above the voice band, within the binder group and the cable's sheath.<br><br>Megabit Testing Results –<br><br>U S WEST does not believe that the tests conducted prior to the roll-out of the Megabit offering are required by the Minnesota Public Utilities Commission order. U S WEST views these results as a proprietary work product. Deployment of the U S WEST Megabit product, with specific central office and terminal equipment, has demonstrated the validity of the testing performed. U S WEST experience indicates that with equipment currently deployed in the central office and customer premise, along with U S WEST's control of the total Megabit and voice service, that impact to other services within the binder group and the cable's sheath are not affected in a negative manner. |

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| | | | U S WEST to either test its equipment alongside CLEC equipment here or to provide the CLECs with the results from the tests, if any, that U S WEST performed on its own Megabit equipment. U S WEST did neither and never confirmed what tests, if any, its own equipment had been put through. None of the U S WEST personnel that participated in the Technical Test Team had been a part of any tests of U S WEST's Megabit equipment. On October 16, Rhythms Links sent information requests to U S WEST asking for the results of any tests performed by U S WEST on its Megabit equipment. U S WEST never responded to those requests.<br><br>**Proposal for resolution:** The Commission should order U S WEST to implement line sharing immediately. The Technical Team, which included U S WEST's engineers, agreed on the appropriate test plan to meet the Commission's mandate that U S WEST and the CLECs test whether line sharing would significantly degrade voice service. The Technical Test team agreed that all the tested equipment met acceptable standards. | |

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| 3. Will the ADSL equipment of the data CLECs in this matter significantly degrade U S WEST's analog voice service when they share the same copper wire? | Partial. | All the parties agree that the laboratory tests showed that the equipment tested in the lab conformed to the technical parameters described in ANSI T1.413 1998 Annex E with minor variations. The technical team agreed that the variations are acceptable. All of the parties agree that the field test results also were acceptable. | See CLEC position set forth in Issue No. 2. | See U S WEST position set forth in Issue No. 2. |
| 4. Can 911 calls successfully be made across shared lines? | Yes. | Yes. | | |
| **Operational Issues** | | | | |
| 5. If line sharing is ordered, have the U S WEST and the CLECs agreed to technical conditions for line sharing? | Yes | Line sharing will be available for ADSL only. Any ADSL equipment used for line sharing will comply with applicable industry standards including ANSI T1.413. If line sharing is ordered or agreed to, the CLECs will not request line conditioning during Phase I implementation. To be available for sharing during Phase I, a line must be free of load coils, electronics and/or excessive bridged taps. | | |
| 6. Can CLECs effectively pre-qualify a loop for line sharing? | Yes. | CLECs will use existing U S WEST interfaces to pre-qualify a loop for line sharing. U S WEST and the CLECs will continue to work on improvements to existing interfaces. | | |
| 7. Can the present U S WEST order form be modified to accommodate a request for a | Yes. | The U S WEST order form can be permanently modified to accommodate a request for a shared line. In the interim, U S | | |

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| shared line? | | WEST and the CLECs will continue to work together on a good faith basis to develop a non-standard LSR that will accommodate a request for a line shared loop. The parties acknowledge that future legal or regulatory action may affect these continued efforts. | | |
| 8. Can U S WEST systems be modified to provision shared lines? | Yes. | U S WEST's POTS processes and systems can be modified to provision shared lines. | | |
| 9. Has a final shared line provisioning process flow been developed? | Yes. | U S WEST and the CLECs have agreed on a high-level process based on the U S WEST POTS processes. The parties have identified long term changes to U S WEST systems that will allow the POTS process to accommodate line sharing. In the interim, POTS processes will require manual intervention for each order. | | |

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| 10. Who will be responsible for repair and maintenance of a shared line? | Yes. | U S WEST will be responsible for repairing voice services and the physical line from the network interface device at the customer premises to the point of demarcation in the central office. CLECs will be responsible for repairing data services. Each party will be responsible for maintaining its own equipment. | | |
| 11. Can U S WEST modify its repair and maintenance systems and processes to accommodate line sharing? | Yes. | U S WEST can modify its repair and maintenance systems and processes to accommodate line sharing. U S WEST and the CLECs are working together to define these modifications. The parties acknowledge that future legal or regulatory action may affect these continued efforts. | | |
| 12. Can U S WEST modify its billing systems and processes to accommodate billing both a CLEC and an end-user for a shared line? | Yes. | U S WEST can modify its billing systems and processes to accommodate billing both a CLEC and an end-user for a shared line. U S WEST and the CLECs are working together to define these modifications. The parties acknowledge that future legal or regulatory action may affect these continued efforts. | | |
| 13. When will the systems be in place to support line sharing? | Yes.. | U S WEST and the CLECs agree that the issues identified in the Gaps Matrix (OSS-2) can be addressed by either an interim or long term solution (where applicable) by 1Q2000, with the exception of Gap 6 regarding billing. The parties agree that it is not necessary to implement an immediate solution to Gap 6 to begin line sharing. | | |

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| | | Instead, the parties have agreed that upon the availability of a billing solution to Gap 6 in 2Q2000, back billing will be rendered to true up accounts from the start of service. | | |
| **Splitter Deployment** | | | | |
| 14. Who will own and control the central office splitter? | Yes. | CLECs will purchase the splitters and provide them to U S WEST. U S WEST will lease the splitters for $0. U S WEST will install, control and maintain the splitters. CLECs will have the option to change splitters. U S WEST and the CLECs are still discussing variations to this plan that may make for more efficient and less costly splitter deployment. The parties have reserved the right to discuss this question again in the future. | | |
| 15. Will the CLECs have test access to the shared line at the splitter? | Yes. | Yes. CLECs will have test access where the combined voice and data line enter the interconnection distribution frame. The traditional point of demarcation will be the point where the data line leaves the splitter. | | |
| 16. What splitters can be ordered for use in the central office? | Yes. | CLECs can order splitters that either (a) were tested during the technical trials in MPUC Docket No. P-999/CI-99-678; or (b) meet the qualifications for central office equipment deployment set by the FCC in its March 31, 1999 order in Docket No. CC 98-147. | | |

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| 17. How will the network configuration be designed in the central office to accommodate POTS splitters? | Yes. | U S WEST and the CLECs agreed on three possible network configurations. The underlying principles are that the splitter will be located as close to the CLEC DS0 (telephone line) terminations as possible, and the splitters will be pre-wired to the CLEC collocation area. | | |
| **Pricing** | | | | |
| 18. What are the proper elements of the non-recurring charge for a shared line? | No. | | U S WEST did not provide the CLECs with its pricing proposal until this Decision Point List was being drafted. The CLECs therefore did not have an adequate opportunity to review the pricing proposal or its components. The CLECs believe that they should not pay any non-recurring charge that is not also built into the cost support for the Megabit tariff.<br><br>**PROPOSAL FOR RESOLUTION**: The Commission should require U S WEST to charge the CLECs no more than the non-recurring charges built into the cost support for the Megabit tariff. | • Basic Installation option<br>• EICT<br>• Trouble Isolation charges (if applicable)<br><br>To the extent other element are identified and the systems costs become known, U S WEST reserves the right to amend this cost information. |
| 19. What are the proper elements of the recurring charge for a shared line? | No. | | U S WEST did not provide the CLECs with its pricing proposal until this Decision Point List was being drafted. The CLECs therefore did | • Shared line<br>• Two – EICT's<br><br>To the extent other element are |

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| | | | not have an adequate opportunity to review the pricing proposal or its components. The CLECs believe that they should not pay any recurring charge that is not also built into the cost support for the Megabit tariff.<br><br>**PROPOSAL FOR RESOLUTION**: The Commission should require U S WEST to charge the CLECs no more than the recurring charges built into the cost support for the Megabit tariff. | identified and the systems costs become known, U S WEST reserves the right to amend this cost information. |
| 20. What will be the price of the shared line? | No. | | The price of the shared line should be the price that is built into the cost support for the Megabit tariff.<br><br>**PROPOSAL FOR RESOLUTION**: The Commission should require U S WEST to charge the CLECs no more than the recurring charges built into the cost support for the Megabit tariff. | • U S WEST will provide a supplemental report to the Commission prior to the hearing. |
| 21. What are the proper elements of the non-recurring charge for splitter collocation? | No. | | U S WEST did not provide the CLECs with its pricing proposal until this Decision Point List was being drafted. The CLECs therefore did not have an adequate opportunity to review the pricing proposal or its components. | • Quote Preparation Fee<br>• Installation/Construction Charge for splitter placement and all other associated components<br><br>To the extent other element are identified and the systems costs become known, U S WEST reserves |

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

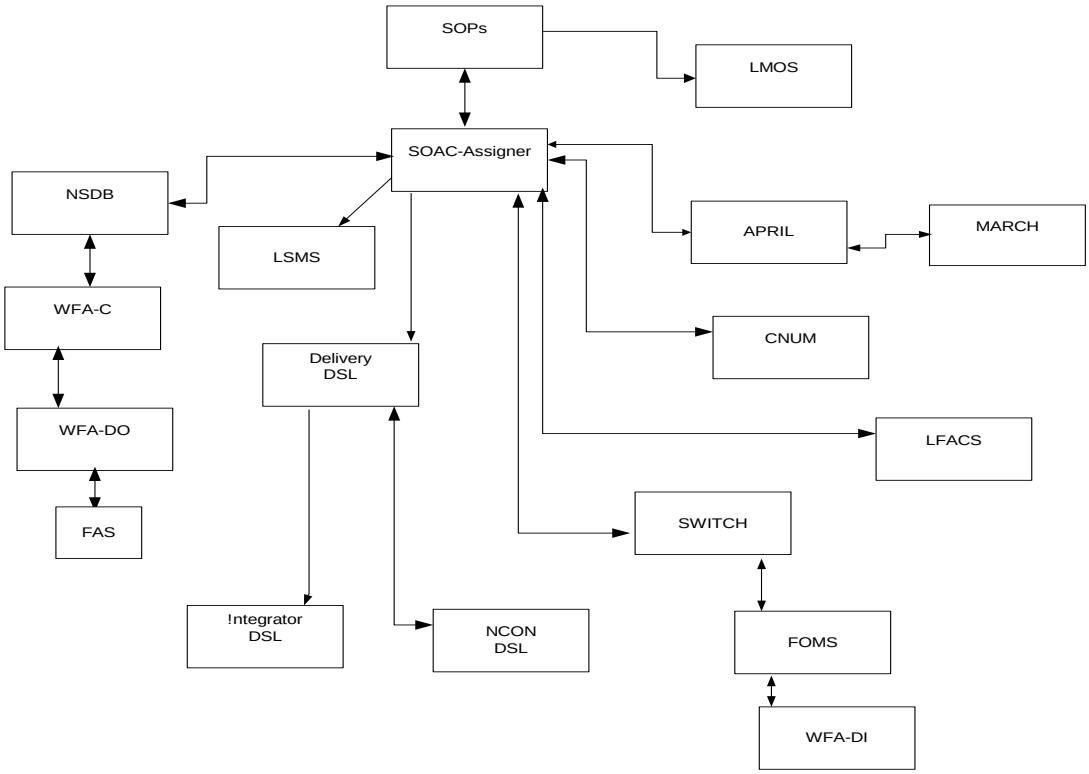
| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| | | | The CLECs should not have to incur additional charges that arise only because the CLECs did not dispute U S WEST's stated desire to maintain control of the splitter. Such additional charges would include the quote preparation fee for central offices where CLECs are collocated.<br><br>**PROPOSAL FOR RESOLUTION:** Because U S WEST wanted to control and maintain the splitter outside of the CLEC collocation area, U S WEST should be required to fund all costs associated with that decision. | the right to amend this cost information. |
| 22. What are the proper elements for the recurring charge for splitter collocation? | No. | | U S WEST did not provide the CLECs with its pricing proposal until this Decision Point List was being drafted. The CLECs therefore did not have an adequate opportunity to review the pricing proposal or its components.<br><br>The CLECs should not have to incur additional charges that arise only because the CLECs did not dispute U S WEST's stated desire to maintain control of the splitter. Such additional charges would include the recurring charges proposed by U S WEST for splitter collocation. | • Space lease – by shelf<br>• Tie cables terminations<br><br>To the extent other element are identified and the systems costs become known, U S WEST reserves the right to amend this cost information. |

**Docket No. P-999/CI-99-678**
**Decision Point List**
**November 22, 1999**

| Issue: | Is There Agreement on This Issue? | Joint Position | CLEC Position & Proposal for Resolution | U S WEST Position & Proposal for Resolution |
|---|---|---|---|---|
| | | | **PROPOSAL FOR RESOLUTION:** Because U S WEST wanted to control and maintain the splitter outside of the CLEC collocation area, U S WEST should be required to fund all costs associated with that decision. | |

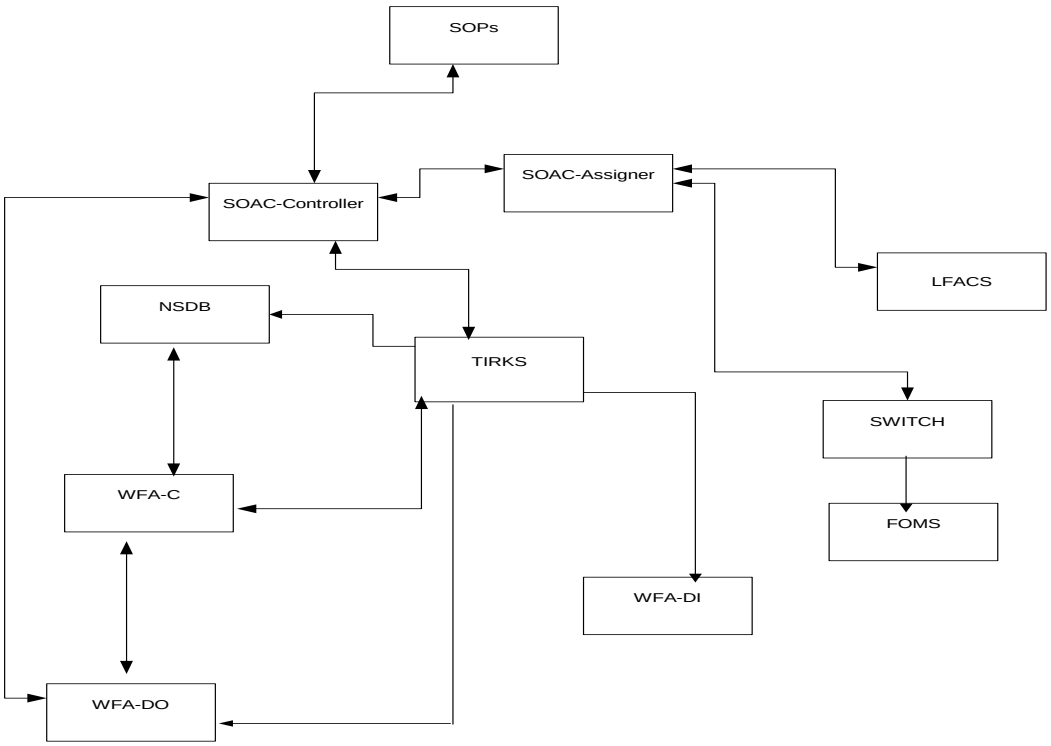
# Provisioning System Flow for Non Design Products

The following diagram is for Non Design products in the Wholesale environment. Some of the systems in the flow are used only when a specific product has been ordered; for example, Delivery, NCON and !ntegrator are used when Unbundled Packet Switch Virtual Customer Channels are ordered. This flow represents all of the systems that could be used in the non- design flow.



## Provisioning System Flow for Design Products

The following diagram is for design products in the Wholesale environment.



## System Descriptions

**APRIL** Switch translations for interfacing with switches.

**CNUM** Customer Number system is responsible for the selection and administration of numbers associated with a customer's service. CNUM provides functionality comparable to the telephone number selection features in PREMIS. CNUM provides a single corporate database for the selection, assignment, and administration of telephone numbers and their associated data.

**Delivery** Service activation for DSL services.

**FAS** Field Access System allows technicians to obtain and close work items via WFA/DO.

**FOMS** The Frame Operations Management System supports frame operations and provides information for the Recent Change Memory Administration Center (RCMAC) in a SWITCH System environment. FOMS provides for facility-based inquiries and other activities requiring a provisioning database. FOMS can print frame orders, manage various status indicators and completions, package work for the frame technicians, and generally manage the frame operation.

**!ntegrator** The !ntegrator system supports the inventory and activation of Lucent DSLAM equipment used for DSL type services.

**LFACS** Loop Facilities Assignment and Control Center System assigns outside plant facilities, based on the type of service (design vs. non-design) requested and the serving central office and its wire center. LFACS inventories outside plant loop facilities such as living units, terminals, cables, cable pairs, serving terminals and cross connection boxes.

**LSMS** Local Service Management System is a Qwest system that coordinates number portability activity with regional LLC (Limited Liability Company).

**LMOS** Loop Management Operations System is used to initiate, track and analyze customer trouble reports on Plain Old Telephone Service (POTS) type subscribers. LMOS front-end computers are used by the Maintenance Centers to access trouble testing and reporting for POTS accounts.

**MARCH** A Memory Administration of Recent CHanges system is a computer system that translates line-related service order data

into switch-provisioning messages and automatically transmits the messages to targeted Stored Program Control System (SPCS) switches.

**NCON** Network Configuration Manager is a GUI (Graphic User Interface) that:

- captures the network inventory of DSLAMs, including equipment at physical locations and the logical paths from the DSLAM to the ATM cloud;
- assigns DSL service requests to that inventory;
- provisions DSL service requests on the DSLAM equipment; and
- provides a database of circuit layout details from the DSLAM to the ATM cloud.

**NSDB** The Network and Services Database system stores customer and circuit data for special service, message, carrier and enhanced non-designed services. This data is received from the SOAC system during service order activity, and from the TIRKS system upon the issue or reissue of the Work Order Record and Details (WORD) document. NSDB also receives circuit and customer data updates and order completion notifications from WFA/C.

**RSOLAR (SOP)** Regional Service Order Logistics and Reference Service Ordering platform used in the Western region. Used to create, process, and distribute Service Orders.

**SOAC** Service Order Analysis and Control is one of two systems under the FACS "suite" of systems (along with LFACS). Between both systems (LFACS and SOAC), it is a system that supports the entire Provisioning environment for Qwest. It maintains the inventory of Outside Plant records for over 25 million customers in all 14 states. It also processes millions of Service Orders each year and ensures that they are properly provisioned through the necessary systems (SWITCH, TIRKS, MARCH/APRIL, PAWS, etc). SOAC specifically is responsible for Service Order analysis, tracking of the order assignment process, and assignment output.

SOAC Assigner is the part of the SOAC system that distributes work orders to SWITCH, APRIL, LFACS and CNUM.

SOAC Controller is the part of the SOAC system that distributes design services orders to TIRKS and WFA.

**SOLAR (SOP)** Service Order Logistics and Reference System enables the creation, maintenance, distribution, and updating of service orders for the Eastern region. Orders are received from various external order generator systems, like SONAR and IFE, as well as being entered through the SOLAR+ terminal network. Orders are distributed to numerous systems, like FACS, LMOS, and CRIS, via on-line, off-line, and batch processes.

**SOPAD (SOP)** Service Order Processing and Distribution allows for online entry of service order information in the Central region. SOPAD is the counterpart to RSOLAR in the Western region and SOLAR in the Eastern Region.

**SOPs** The Service Order Processor is the owner of the official version of the service order from origination to completion and posting in CRIS. The SOPs provide service order update, edit, distribute, resend and tracking. Three systems make up the SOPs, SOPAD for the Central region, SOLAR for the Eastern region and RSOLAR for the Western region.

**SWITCH** SWITCH is an operation’s system designed to inventory and assign central office switching equipment and related facilities. It allows Qwest to provision a network that is comprised of both digital and analog technologies.

**TIRKS** The TIRKS system provides for order control and integrated record keeping which allows for highly mechanized provisioning functionality. The TIRKS system is used specifically for designed services and the inventory (equipment and facilities) necessary to provide for the many complex designed services including such items as SONET, DS1, DS3 and Hicap services.

**WFA-C** The Work Flow Administration/Controller system optimizes and consolidates work assignments that presently exist in Complex Service Centers and Network Reliability and Operations Center (NROC's). WFA-C is used to assign, track and document the work activities for Complex service orders and maintenance tickets.

**WFA-DI** The Work Flow Administration/Design system is a mechanized system that significantly reduces the paper flow and support services needed to manage control centers. The WFA-DI system, with its TIRKS system interface and WFA-C interface capabilities, supports and simplifies the coordination, tracking, pricing and assigning of work requests for "designed" as well as certain "non-designed" services. WFA-DI is used by technical, clerical and management personnel associated with a control center. A control center is a term used to describe the work groups that administer the bulk of a central office's daily work.

**WFA-DO** The Work Flow Administration/Dispatch Out system automates the work assignments of technicians who work outside the Central Offices to install and maintain telephone services. It automates such tasks as loading and prioritizing work requests, estimating the time required to do jobs and scheduling the work. It provides on-line status tracking for work requests and helps track productivity of a work center for management use.

CMP

- CMP Home
- CMP Document
- Team Meetings
  - Archive
- Change Requests (CRs)
  - Archive
- CMP Redesign
  - Archive
- Document Review
  - Product/Process Archive & Responses
  - System Archive & Responses
- CMP Oversight Committee
- Escalations/Disputes
  - Initiation
  - Ongoing Escalations
  - Archive
- OSS Hours of Availability
- CMP Points Of Contact (POCs)
- Customer Notification Letter Archive
- CMP Calendars
- OSS Interface Releases
- Team Meetings
- Other System Links

# Open System CR SCR102102-1X Detail

## Title: Dual Inventory of DSL tie cables in TIRKS and SWITCH/FOMS

| CR Number | Current Status Date | Level of Effort | Interface/ Release No. | Area Impacted | Products Impacted |
|---|---|---|---|---|---|
| **SCR102102-1X** | Pending Prioritization 11/5/2003 | 3275 - 5450 | IMA Common/ | Virtual and Physical Co-Location | Line Sharing, UNE |

**Originator:** Zulevic, Michael

**Originator Company Name:** Covad

**Owner:** Winston, Connie

**Director:** Winston, Connie

**CR PM:** Stecklein, Lynn

## Description Of Change

Revised Request: Covad requests that beginning April 1, 2003, we have the capability to check the availability of or place orders to use our DS0 tie cables for either Line Sharing or UNE/second line DSL services. This capability would not be required for existing TIE cables that are used for Line Sharing, Line Splitting or Loop Splitting in conjunction with a Common Area Splitter Collocation arrangement. These TIE cables are cabled to the splitter port either directly or through a hard-wired arrangement using the existing 410 block. Currently, we must designate the type of service we intend to provide on each cable in advance and if we find we need to re-designate the use of a specific tie cable, we are assessed a cable reclassification charge. SBC currently provides the capability to check the availability of both Line Sharing and UNE/second line DSL services. Having to declare the use of tie cables in advance greatly inhibits our ability to efficiently use our investment in tie cable.

Expected Deliverable

April 1, 2003

Original Request: Covad requests that our collocation DS0 tie cables be inventoried in both TIRKS and SWITCH/FOMS so that we can use our available inventory of tie cables for either Line Sharing or UNE/second line DSL services. Currently, we must designate the type of service we intend to provide on each cable in advance and if we find we need to re-designate the use of a specific tie cable, we are assessed a cable reclassification charge. The concept of dual inventorying has been proven in SBC and is no longer an issue. Having to declare the use of tie cables in advance greatly inhibits our ability to efficiently use our investment in tie cable.

Expected Deliverable

Dec. 1, 2002

CMP

- CMP Home
- CMP Document
- Team Meetings
  - Archive
- Change Requests (CRs)
  - Archive
- CMP Redesign
  - Archive
- Document Review
  - Product/Process Archive & Responses
  - System Archive & Responses
- CMP Oversight Committee
- Escalations/Disputes
  - Initiation
  - Ongoing Escalations
  - Archive
- OSS Hours of Availability
- CMP Points Of Contact (POCs)
- Customer Notification Letter Archive
- CMP Calendars
- OSS Interface Releases
- Team Meetings
- Other System Links

## Status History

| Date | Action | Description |
|---|---|---|
| 2/21/2003 | Status Changed | Status changed from Evaluation to Pending Prioritization |
| 1/15/2003 | Additional Information | Crossover CR created from PC102102-1X |
| 2/20/2003 | Discussed at Monthly CMP Meeting | Discussed at February Systems CMP Monthly meeting; please see Systems CMP Distribution Package February CMP - Attachment B. |
| 4/7/2003 | Release Ranking | 14.0 Prioritization- Ranked #21 out of 53 |
| 4/28/2003 | Release Ranking | Rank changed due to Late Adders- Ranked #22 |
| 5/30/2003 | Release Ranking | Rank changed due to Late Adders- Ranked #23 |
| 7/9/2003 | Status Changed | Status changed to pending prioritization with the release of IMA 14.0 Packaging. |
| 9/2/2003 | Release Ranking | 15.0 Prioritization- Ranked #37 out of 57 |
| 9/29/2003 | Release Ranking | 15.0 Revised Prioritization, due to Late Adder - Ranked #38 out of 58 |
| 11/5/2003 | Status Changed | Status changed to pending prioritization |
| 2/4/2004 | Release Ranking | 16.0 Prioritization- Ranked #31 out of 50 |
| 3/1/2004 | Release Ranking | IMA 16.0 Revised Prioritization, Late Adder Ranking - #32 out of 51 |
| 8/3/2004 | Release Ranking | 17.0 Prioritization- Ranked #17 out of 41 |

## Project Meetings

7/22/04 Systems CMP Meeting

Jill Martain/Qwest stated that Qwest would distribute the ballot on July 27th, it is due back to Qwest on July 30th, and Qwest would email the initial prioritization list to the CLECs on August 3rd. There were no questions.

John Berard/Covad stated that this was a high priority for Covad.

8/21/03 CMP Systems Meeting Liz Balvin/MCI stated that she spoke to Covad and that out of their three type choices, this one was the lowest. 01/15/03 - CMP Meeting

Cook-Qwest presented the Qwest response. White-Qwest recommended the CR be placed in Evaluation status when it is crossed over. Zulevic-Covad stated that this was fine. The CR was crossed over to systems with a status of Evaluation.

==========

Ad Hoc Meeting 1:00 PM (Mountain Time) / Monday, January 6, 2003

Attendees Matt White – Qwest Jeff Cook – Qwest Becky Neesen – Covad John Berard – Covad Kim Issacs – Eschelon Bonnie Johnson - Eschelon Sharon Van Meter – AT&T

Introduction of Attendees White-Qwest welcomed all attendees and described the purpose of the meeting. He explained that Qwest and Covad had had further discussions about the request over the last several weeks and that Qwest had identified several differences between Qwest and SBC's architecture that made the request, as written, difficult to implement. After discussion of these differences, Covad had revised their description of change. White-Qwest asked Cook-Qwest to describe the network architecture differences. Cook-Qwest explained the

differences between the Qwest network architecture and the SBC architecture. He stated that in order to grant the Covad request as it was currently written Qwest would have to rewire much of its existing network in order to allow CLECs using Common Area Splitter Collocation the ability to use its DSL terminations from the DSLAMs for either xDSL Unbundled Loops or Line Sharing-type services. He stated that he had some questions about Covad's request as it pertained to their intentions to use it to provision xDSL Unbundled Loops through the data only 410 termination block.

Neesen-Covad stated that her understanding was that this request now asks that Covad will be able to look up all future and presently unused facilities on the same functionality. Cook-Qwest stated that this was his impression. Neesen-Covad asked if this only applied to collocated splitters or for both collocated and common area splitters. Cook-Qwest stated that it only applied to only collocated splitters. Neesen-Covad stated that Covad has set a soft due date of April 1, 2003. She explained that Covad is doing an internal OSS change and may end up changing the date.

White-Qwest stated that Qwest's analysis had revealed that in order to fully meet Covad's request there were IMA changes that needed to be made. He explined that this required the CR to be crossed over into the systems side of CMP. Berard-Covad asked for an explanation of the IMA implications. Cook-Qwest stated that Qwest was looking at doing a dual look into both inventories and implementing an up-front ability to look into both systems on a pre-order basis.

Neesen-Covad stated that Covad's original objective was to minimize collocation costs, use existing inventory on command and reduce wiring errors. Berard-Covad asked how this would work to convert existing blocks? Jeff-Qwest stated that there had been no discussion of blocks would be converted. He explained that if a block used a common area splitter, it would not be converted.

White-Qwest asked if there were any other questions. There were none. White-Qwest thanked the participants and adjourned the meeting.

==========

Additional Clarification Meeting 2:00 PM (Mountain Time) / Thursday, January 2, 2003

Attendees Matt White – CRPM Jeff Cook – Qwest Scott Sharket – Qwest Mike Zulevic – Covad Becky Neesen – Covad

Introduction of Attendees Cook-Qwest welcomed all attendees and reviewed the request and his reason for calling the meeting. He explained the differences between the Qwest network architecture and the SBC architecture. He stated that in order to grant the Covad request as it was currently written Qwest would have to rewire much of its existing network in order to allow CLECs using Common Area Splitter Collocation the ability to use its DSL terminations from the DSLAMs for either xDSL Unbundled Loops or Line Sharing-type services. He stated that he had some questions about Covad's request as it pertained to their intentions to use it to provision xDSL Unbundled Loops through the data only 410 termination block.

Zulevic-Covad stated that Covad was trying to establish a situation where Covad could convert existing DSO's to line sharing without extensive delays.

Neesen-Covad stated that Qwest currently enforces a 90 day interval and completed work often includes errors.

Cook, Zulevic and Neesen discussed several potential ways to overcome the gap between the request and what was physically possible on the Qwest network. The three agreed that this request would be better implemented of the description was rewritten to be more forward looking.

Sharkey-Qwest asked if Covad was interested in this functionality for pre-order as well as ordering.

Neesen-Covad stated that they were.

White-Qwest stated that he and Cook would revise the Description of Change and forward it to Zulevic and Neesen for review.

==========

12/18/02 - CMP Monthly Product/Process Meeting

Cook-Qwest described the CR and presented the Qwest response. Zulevic-Covad stated that if Qwest had any questions when it was deciding options to pursue it should contact Covad for an ad hoc meeting. Van Meter-AT&T asked that she also be included in the ad hoc meeting. She also asked how Qwest would determine the best solution. Cook-Qwest stated that Qwest would decide based on the most efficient option that fully satisfied the CLEC request. Balvin-WorldCom stated that Qwest should document all the options it is considering and why it chooses to pursue, or not pursue, each. Zulevic-Covad stated that he would like to see this option because Covad may opt to use the SCRP to fund a systems change that Qwest feels is too expensive. White-Qwest stated that he would work with Cook-Qwest and Zulevic-Covad to set up an ad hoc meeting. The CR was moved into Evaluation

status.

==========

11/20/02 - CMP Monthly Product/Process Meeting

Zulevic-Covad presented the CR. He stated that SBC had already allowed its wholesale customers to do a one-time conversion of DSO tie cables to both databases for no charge. Cook-Qwest stated that he had no questions. The CR status was updated to Presented.

==========

CLEC Change Request – PC102102-1 Clarification Meeting 2:00 PM (Mountain Time) / Wednesday, November 6, 2002

1-877-550-8686 2213337#

Attendees Matt White – CRPM Jeff Cook – Qwest Brett Fesler – Qwest Mike Zulevic – Covad Becky Neesen – Covad

Introduction of Attendees White-Qwest welcomed all attendees and reviewed the request.

Review Requested (Description of) Change Zulevic-Covad reviewed the CR. He stated that there is a delay if Covad uses the existing inventory for tie pairs with line sharing because the pairs need to be reclassified from UNE to line sharing. He stated that this was because Qwest maintains two different databases for the two inventories. He continued that there was a similar problem at SBC until SBC solved by adopting a dual inventory system where the same pairs were inventoried in TIRKS and SWITCH/FOMS. He summarized that Covad wanted some way to utilize tie cables from either service without additional cost of delay to transfer.

Zulevic-Covad stated that he had recently come from a meeting with Steve Nelson. He stated Nelson was aware of this CR and would probably send someone to work on it.

Fesler-Qwest stated that he worked with Nelson's group and was the product SME for this CR.

Confirm Areas and Products Impacted White-Qwest confirmed that the attendees were comfortable that the request appropriately identified all areas and products impacted. Confirm Right Personnel Involved White-Qwest confirmed with the attendees that the appropriate Qwest personnel were involved.

Identify/Confirm CLEC's Expectation White-Qwest reviewed the request to confirm Covad's expectation.

Identify and Dependant Systems Change Requests White-Qwest asked the attendees if they knew of any related change requests.

Establish Action Plan White-Qwest asked attendees if there were any further questions. There were none. White-Qwest stated that the next step was for Covad to present the CR at the November Monthly Product/Process Meeting and thanked all attendees for attending the meeting.

## QWEST Response

REVISED RESPONSE

February 19, 2003

RE: SCR102102-1X Dual Inventory of DSL tie cables in TIRKS and SWITCH/FOMS Qwest has reviewed the information submitted as part of Change Request (SCR102102-1X). Based upon the scope of this CR as agreed to in the Clarification Meeting, Qwest is able to provide an estimated Level of Effort (LOE) of 3275 and 5450 and(SATE) 375 and 500 hours for this IMA Change Request.

At the next Monthly Systems CMP Meeting, CMP participants will be given the opportunity to comment on this Change Request and provide additional clarifications. Any clarifications and/or modifications identified at that time will be incorporated into Qwest's further evaluation of this Change Request.

This Change Request is an eligible candidate for the IMA 14.0 Release.

Sincerely,

Qwest

January 6, 2003

REVISED RESPONSE For Review by CLEC Community and Discussion at the January 15, 2002, CMP Product/Process Meeting

Mike Zulevic Director - GEA Covad Communications

SUBJECT: Qwest's Change Request Revised Response - CR #PC102102-1

Qwest conducted a meeting on January 6th to discuss with the CLECs Covad's request for dual inventory of tie cables. From this meeting, it was determined that one solution to Covad's request is to have the IMA systems automatically check SWITCH and TIRKS to ensure that the requested pair is not in use in either system. This verification will be required on all Line Sharing, Line Splitting, Loop Splitting (excluding orders requesting the use of Common Area Splitters), and xDSL capable loops. Qwest recommends that this CR crossover to become a Systems CR. It should be understood that Qwest cannot agree to implement this solution until Qwest determines its operational functionality and/or the cost associated with it.

Sincerely,

Jeff Cook Staff Advocate – Policy & Law

==========

December 6, 2002

DRAFT RESPONSE For Review by CLEC Community and Discussion at the December 18, 2002, CMP Product/Process Meeting

Mike Zulevic Director - GEA Covad Communications

SUBJECT: Qwest's Change Request Response - CR #PC102102-1

Currently, Qwest does not have an automated process in place to inventory the DS0 terminations in both the TIRKS and SWITCH systems. Duplicating DS0 terminations in both systems requires there be a mechanism to synchronize assignments for DS0 terminations between the systems. As a result, manual processes would be necessary to ensure the DS0 inventories in TIRKS match those in SWITCH.

To better understand this issue and to gain clarity around how SBC has successfully employed this capability, Qwest pursued a very high-level explanation from SBC of the SWITCH/TIRKS enhancements implemented by SBC. While on the surface it appears that SBC does maintain a dual inventory of DS0 terminations, Qwest has not yet been able to determine how SBC maintains the data in both systems to ensure inventory consistency and accuracy.

Qwest would like to move this Change Request into the Evaluation Status in order to explore the potential options available to address this request. Qwest will provide a readout of where we are at the December CMP meeting and will outline the next steps to be accomplished at the January CMP meeting.

Sincerely,

Jeff Cook Staff Advocate – Policy & Law Qwest

<Back

**Information Current as of 2/25/2005**

# Operational Impact Review
# January 14, 2000 Minutes

**To:** **Line Sharing Team**

| | |
|---|---|
| Jerry Shypulski | **gshypul@uswest.com** |
| Stephen Moreno | **smoreno@covad.com** |
| Linda Miles | **llmiles@uswest.com** |
| Caryn Anderson | **canderson@northpointcom.com** |
| Barbara Brohl | **bbrohl@uswest.com** |
| Mary Retka | **mretka@uswest.com** |
| Cliff Dinwiddie | **cdinwiddie@northpointcom.com** |
| Bill Campbell | **wmcampb@uswest.com** |
| Susan McAdams | **smcadams@newedgenetworks.com** |
| Mike Radcliff | **maradcl@uswest.com** |
| Suzy Swett | **sswett@newedgenetworks.com** |
| John Boynewicz | **jboynew@uswest.com** |
| Mike Slater | **mslater@newedgenetworks.com** |

| | |
|---|---|
| Joyce Frost | **joyce.a.frost@mail.sprint.com** |
| Paul Alexander | **paul.alexander@mail.sprint.com** |
| Jack Buettner | **jack.buettner@mail.sprint.com** |
| Rob Hisle | **rob.e.hisle@mail.sprint.com** |
| Teresa Jasper | **teresa.jasper@mail.sprint.com** |
| Don Akers | **don.c.akers@mail.sprint.com** |
| Jo Gentry | **jgentry@rhythms.net** |
| Jill Wiesner | **jwiesner@rhythms.net** |
| Brett Flinchum | **bflinchu@covad.com** |
| Penny Bewick | **pbewick@newedgenetworks.com** |
| Rob McMillin | **rmcmillin@newedgenetworks.com** |
| John Hanson | **jxhanso@uswest.com** |
| Andre Bachelet | abachelet@rhythms.net |
| Linda Kosky | **lkosky@uswest.com** |
| Linda Gale | **ligale@uswest.com** |
| Kevin Stover | **kstover@uswest.com** |

**From:** Jerry Shypulski

# Operational Impact Review
# January 14, 2000 Minutes

**Re:** OSS/ Operational Impact Review Meeting **01-21-2000**

**Up-Coming Meeting Schedule:**

***** Next OSS meeting 1/21/00 9:00-11:00 MST Bridge # 303-633-4874*****

Agenda: Discussion around proposal to OBF around Line Sharing LSR Standards

Review OSS/GAP Matrix

Review Action Issues

Identify Items to be referred to Up-Coming Admin Team meeting

***** No LSR or Repair Sub-Team meeting week of January 17th*****

# Operational Impact Review
# January 14, 2000 Minutes

## I. ACTION ITEMS

### Pre-Order and Order

| | Assigned to | Due Date | Action Items | Source[1] | Result |
|---|---|---|---|---|---|
| 1 | LSR Subteam | | • Create the proprietary LSR with appropriate ordering fields (e.g., the additional connection points: TN; NC/NCI field used for request type; and the CFA-like connections – splitter) | 10/15/99 #4<br><br>11/12/99 #2 | 12/17/99<br>LSR sub team met 12/15/99<br>CLEC request to use IMA as entry point and "push thru" order.<br>-Sub Team researching<br>-May be issues around order routing which may prevent.<br>Priority List of LSR submittals<br>-IMA<br>-Email<br>-Fax<br><br>12/30/99<br>Process has been worked out to use IMA 4.2 to submit LSR requests for Line Sharing.<br>Job Aid created and distributed.<br>Test set up for Tuesday 1/4/99 for DLECs to submit "Test" LSRs and USW to track.<br><br>01/07/00<br>Plan is to process a series of "walk-through" tests orders on Monday-Wednesday 1/10-1-12.<br><br>01/14/00<br>Reviewed this item and its association with OSS/Gap Matrix. Does this satisfy Interim Solution until OBF Long term solution? |

[1] Source refers to the Operational Impact Review Minutes Action Items

| | | | | | |
|---|---|---|---|---|---|
| | | | • Investigate submittal of LSR via e-mail | | 12/30/99<br>With the above IMA process, if a DLEC doesn't use IMA, LSRs will be submitted via FAX.<br><br>01/07/00<br>IMA Test successful. Plan is to implement for orders in 1st three offices.<br>Co-Providers will confirm in writing their concurrence with IMA/LSR interim process and risks associated.<br><br>01/14/00<br>Most Co-Providers have confirmed in writing their concurrence. Would like to close item by 1/21/00.<br><br>01/21/00<br>The CLECs feel they have all done this. Jerry, please check to see if you have received them all. |
| 2 | Linda Miles | | • Refine the estimates of the length of time needed to:<br>➢ Establish edits for USOCs and FIDs<br>➢ Load the tables with USOCs and FIDs<br>➢ Obtain USOCs and FIDs | 11/12/99 #2 | 12/17/99<br>USOCs and FIDS for Line Sharing had been established.<br>Upon receipt of LSR, USW will manually transfer LSR info into USOCs and FIDS.<br><br>**12/30/99 CLOSED** |
| 3 | LSR Subteam & Barb Brohl | | • Develop long-term plan for OBF standard LSR to support line sharing and create the documentation required for submittal to OBF.<br><br>• Determine how the request to implement the "standards-based" LSR will be prioritized (through this team or through the CICMP process) | 11/12/99 #1 | The next meeting is scheduled for February 2000.<br><u>Process</u><br>Must have the information to the committee 3 to 4 weeks in advance. Can walk issues in only if they are fully defined.<br>If there is a full interim between the two official meetings, issues can be reviewed.<br><br>12/30/99<br>Will require discussion at next meeting 1/7/99 between DLECs and USW around the synergy between the USW Change Mgmt Process and the interaction with establishing OBF standards. |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | 01/07/00<br>Due to many members being missing this item was determined to be discuss as a group on next week's call.<br><br>01/14/00<br>Linda Kosky, USW OBF representative, will attend next Friday's meeting and discuss the upcoming OBF and USW's proposal for Line Sharing standards.<br><br>01/21/00<br>Linda Kosky explained the OBF process. She is meeting internally first to ensure that the requirements are clear. She will be sharing her first draft with the CLECs sometime during the week of January 24, 2000 or January 31, 2000. **(**Jerry, you need to find out and advise the CLECs with the minutes.**)** After that, she will present it to OBF at the February 7 - 11, 2000 meeting. While this can take up to two years for approval, if worked in task forces outside of the scheduled committee meetings, it can be much quicker. After much discussion, it was determined that the absolute earliest date for OBF approval would be the August 2000 meeting.<br><br>The group wants Linda Kosky to document the process that she described.<br><br>The CLECs agreed that modification of the UNE loop form was appropriate. (rather than a new form)<br><br>Linda advised the group who the OBF representatives were from Sprint, Covad, and NorthPoint. Rhythms and New Edge will identify their OBF representatives and advise Linda.<br><br>The group agreed to queue the issue of prioritization |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | of the implementation of the new LSR in IMA to the Administrative Issues Team. |
| 4 | Jerry Shypulski and Bill Campbell | | • With the following pre-order information being provided, will a DLR be necessary?<br>➢ telephone number or address<br>➢ total cable length [no individual gauge sections]<br>➢ sum of the length of all bridge taps<br>➢ presence of DLC<br>➢ DB loss<br>➢ presence of load coils<br>➢ identification of missing segments)<br>• Compare pre-order information differences between IMA 4.2 and that described on 10/15/99, to the data provided on a DLR.<br>• Is MLT available in pre-order and how does an MLT compare with a DLR? | 10/22/99 #4, 5 & 6 | 10/25/99<br>The conference call was held between USWC and DLECs.<br><br>11/5/99<br>Bill Campbell will document the outcome of the call. Bill Campbell will document the outcome of the call. MLT is not currently available in pre-order. (It must be identified as a gap for Phase 1.5) Jerry Shypulski will provide documentation on MLT comparision to DLR for inclusion in Bill Campbell's document.<br><br>12/17/99<br>Jerry will provide the documentation. There has been more information uncovered about MLT from Repair team to aid this documentation<br><br>12/30/99<br>Feedback will provided at next meeting 1/7/99<br><br>01/11/00<br>Documentation comparing MLT to DLR attached to this week's minutes- **CLOSED**<br><br>01/21/00<br>The CLECs requested that this action item be re-opened. U S WEST completed its assignment by providing the documentation to the CLECs, however, they still need to review the documentation and determine if a DLR is necessary. |
| 5 | Linda Miles | | • Identify the process for the return of:<br>➢ Held Orders<br>➢ Jeopardy Notifications<br>➢ FOCs<br>➢ Rejects | 10/29/99 #1 | 12/17/99<br>Referred to the LSR sub-team to provide documented process.<br><br>12/30/99 |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | Examples of FOCs & Rejects provided via LSR Sub-Team. Jeopardy notifications will be discussed at next LSR sub-team meeting.<br>Held Order Process will not be required per MN Stipulation Phase 1. Will be addressed in subsequent phases.<br><br>01/21/00<br>Jeopardy Notification and Held Order processes are Phase II, however, there can be some work started now. It is necessary to allow some of the shared line orders to process and then identify what needs to be developed. Linda Miles advised that she wants to follow the UNE Loop process for held orders and tweak as necessary. Cliff Dinwiddie requested that this process be documented now and then we can discuss the changes that may be necessary. Linda Miles agreed to check with Jerry Shypulski about the "loop cookbook." Linda agreed to check where the current documentation is and how it is packaged. |

**Repair**

| | | | | | |
|---|---|---|---|---|---|
| 6 | Repair Subteam | | • Develop and propose a detailed repair process, with attention to:<br>➢ Megabit™ trouble-shooting process<br>➢ Identification of the testing that is available<br>➢ MLT<br>➢ Whether the RSAs are able to run MLT tests on the voice portion of the loop<br>➢ Joint repair processes<br>➢ How to provide trouble history for a shared line<br>• The repair process will address:<br>➢ Coordinated testing processes<br>➢ Acknowledgement / communications<br>• The product must address:<br>➢ The definition of collocation must define | 10/29/99 #1<br><br>11/5/99 #3<br><br>11/12/99 #4, 5 | 12/17/99<br>Sub team met 12/16/99 and analyzed repair process and identified gaps to close from interim (1/10/990 perspective and a permanent perspective.<br><br>12/30/99<br>Continued on-going work being done by Repair Sub-team.<br>Process will include DLEC ability to request MLT results.<br>Repair process and testing results will be validated through a planned "walk-thru" of initial Line Sharing requests the week of January 10th.<br><br>01/07/00<br>Will make Central Office technician available for |

| | | | | | |
|---|---|---|---|---|---|
| | | | test access and demarcation<br><br>• Can the splitter be the point of demarcation? (3 splitter location scenarios) The DLECs want test capability at the MDF side of the splitter – at the point where the cable goes into the splitter.<br><br>The DLECs will agree that the demarcation be at the collocation side of the splitter => provided that the DLECs have testing access presence at the MDF side of the splitter and at the collocation side of the splitter. | | Co-Provider testing on the series of Test Orders send 1/10/00.<br><br>12/30/99 **CLOSED**<br>Demarc established per Minnesota Stipulation |

**Billing**

| | | | | | |
|---|---|---|---|---|---|
| 7 | | | Define lower level billing processes | 10/22/99 #9 | 12/17/99<br>CRIS will establish a separate CLEC summary bill for Line Sharing lines. The format will look the same as current bills for UBL. The CLEC will be provided a Miscellaneous account # for each line on the FOC. CLEC must keep track of Misc# to compare on bill.<br><br>12/30/99 **CLOSED**<br>Summary Bill numbers for Minnesota provided to the DLECs via LSR Sub-Team. |

**Customer Experience**

| | | | | | |
|---|---|---|---|---|---|
| 8 | | | Adddress Customer Experience<br><br>• More fully flush out voice customer-affecting experiences in the "End-User Behavior Matrix Proposal" with attention to: | 10/29/99 #4, 5<br><br>11/5/99 #1, | 12/17/99<br>Jerry asked for feedback regarding the End User Behavior Matrix by next meeting.<br><br>Discussion around end user notification. |

| | | | | | |
|---|---|---|---|---|---|
| | | | ➢ DNP and Disconnect<br>➢ T&F (transfer of service to and from location)<br>➢ Accounts that are resold, converted to UNEs, ported out, etc.<br><br>• Determine if U S WEST can notify the CLECs when the end-user "loses" his/her voice service from U S WEST | 2 | Basic questions asked were:<br>Is notification required? Why?<br>Who is responsible to notify?<br>What should notification communicate?<br>What form and input between CLEC & USW?<br><br>Both sides asked to confer with their Administration Team representatives for next meeting.<br><br>12/30/99<br>Based on information from each group's Admin Team representatives, the Decision is End User notification is a DLEC responsibility. And each DLEC will provide their company notification process.<br>Standard USW information, such as reenforcing End User "Voice" repair process and telephone numbers will be provided by USW for inclusion in each DLEC notification.<br><br>01/07/00<br>USW would like Co-Provider documentation to re-enforce End User to maintain repair calling process with their voice problems and Co-Providers use AMSC to call in their Data problems. **CLOSED** |

## Miscellaneous

| | | | | | |
|---|---|---|---|---|---|
| 9 | Dennis Pappas | | • Identify what CTAS can be used for, and does it have any application in a line sharing environment? | 10/29/99 #3 | 12/17/99<br>No status<br><br>12/30/99 **CLOSED**<br>IMA is the current electronic bonding choice, so CTAS doesn't appear to be a solution. |
| 10 | Cliff Dinwiddie | | • Check wil Christine Mailloux on the Y-Splice / Half-tap issue. | 10/29/99 #6 | 12/17/99<br>No status<br><br>12/22/99 **CLOSED**<br>Per Cliff Dinwiddie, Northpoint requests item be closed. |

| | | | | | |
|---|---|---|---|---|---|
| 11 | Caryn Anderson | | • Given that the dates on the Gap Matrix moved to timeframes acceptable to the CLECs, is it still necessary to define the difference between a bridge lift and a splitter and determine whether it can it be used here?<br><br>**NOTE:**<br>**USW is inventorying POTS Splitters with the Legacy system SWITCH on an interim basis as miscellaneous equipment. This provides similar inventory results, on the interim, as bridge lifter theory.** | 11/12/99 #3 | 12/17/99<br>The format that USW will use on an interim manual basis does resemble the bridge lifter assignment structure in SWITCH.<br><br>12/30/99<br>No update now. Item will probably be closed by next meeting.<br><br>01/07/00<br>No status this week.<br><br>01/14/00<br>Per Cliff Dinwiddie item can be closed. **CLOSED** |
| 12 | Barb Brohl, Jerry Shypulski, & Kevin Stover | | • Make a list of the documents provided during the Operational Impact Review and determine how to get them to the team (investigate e-mail or website) | New | 12/17/99<br>No status..still under investigation<br><br>12/30/99<br>No status at this time.<br><br>01/07/00<br>No status this week<br><br>01/14/00<br>Barb and Jerry will provide status next week.<br><br>01/21/00<br>Barb Brohl advised that the list of documents has been developed:<br>• Action Items List<br>• Process Flows<br>• OSS Gap Matrix<br>• Priority List of Offices<br>• IMA LSR Modifications<br>• Job Aids<br>• OBF Status<br>• Acronym List<br>• Documents Filed with MPUC on 11/22/99 (possibly, need to check if any proprietary info) |

| | | | | | |
|---|---|---|---|---|---|
| | | | | | Those documents that do not change will be zipped, but those that do change (e.g. action items list, OBF status) will not be zipped.<br><br>Barb advised the group that at this time, the files will e-mailed out on monthly basis. This will be a complete re-fresh. This is in lieu of a secure web site because it was not efficient to have resources work on this rather than the modifications that are necessary to make line sharing work. |
| 13 | Barb Brohl | | • Determine how the request to implement the "standards-based" LSR will be prioritized (through this team or through the CICMP process) | | 12/17/99<br>Barb wants to maintain emphasis on this for future meetings.<br><br>**12/30/99 CLOSED HERE** (see below note)<br>Moved this action item to Pre-Order/Order item number 3 |
| 14 | Barb Brohl, Kevin Stover | | • Discuss long term OSS solution around the Telecordia/ SWITCH and Line Sharing<br><br>• Telecordia Interface Front Development | | 01/14/00<br>New items to Action list. For discussion next week.<br><br>01/21/00<br>Kevin Stover advised that until a contract is signed, there is no official name or number. Once it is, Kevin will advise the group.<br><br>Kevin advised the group that we had no information regarding the Interface Front development effort, and if the CLECs are using it, they need to advise Telcordia who their ILEC partners are so that compatibility can be assured. |

# Firm Order Manager
# FOC Review

FOC Summary for LSR_ID: ***BEGIN CONFIDENTIAL END CONFIDENTIAL***

######## Administration Section ##########################################

CCNA CC PON---- VER AN---------- LSR-NO-- PIA EC-VER
***BEGIN CONFIDENTIAL END CONFIDENTIAL***

INIT---------- D/TSENT-------------
Service Center ***BEGIN CONFIDENTIAL END CONFIDENTIAL***

BAN1------------ LSP-DSGCON LSP-TELNO
***BEGIN CONFIDENTIAL END CONFIDENTIAL***

######## Order Information Section ##########################################

ORDER-REF-NUM ORD------ DD-------- ORD-IND--- AN-------------
***BEGIN CONFIDENTIAL END CONFIDENTIAL***

Circuit Information Section

REF-NUM ECCKT--------------
***BEGIN CONFIDENTIAL END CONFIDENTIAL***

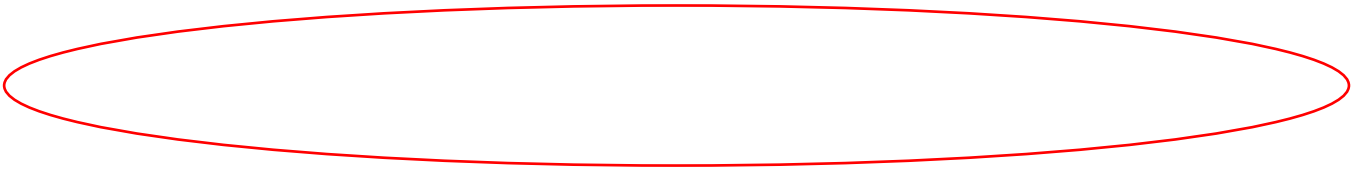
######## Order Information Section ##########################################

ORDER-REF-NUM ORD------ DD-------- ORD-IND--- AN-------------
***BEGIN CONFIDENTIAL END CONFIDENTIAL***

Circuit Information Section

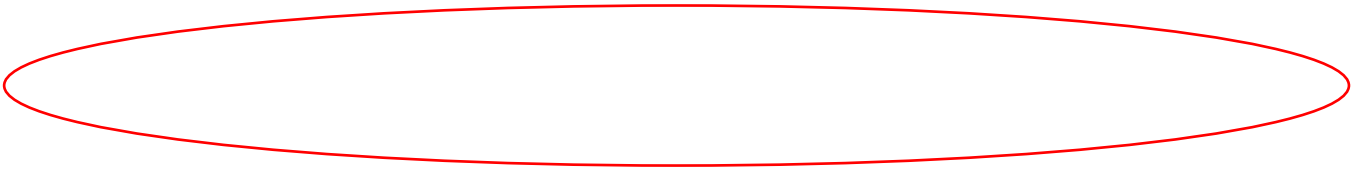
REF-NUM ECCKT--------------
***BEGIN CONFIDENTIAL END CONFIDENTIAL***

#1 #2 #3 #4 #5 #6 #7 #8 #9 #10



Qwest/18
Albersheim/2

#11 #12 #13 #14 #15 #16 #17 #18



Products & Services

Local Business Procedures

Local 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
- Commercial Agreements

# Billing Information - Customer Records and Information System (CRIS) - V28.0

History Log

## Description

Customer Records and Information System (CRIS) is one of the systems Qwest uses to bill various products and services, which are not billable via any other Qwest billing system.

Qwest will bill you for products and services you purchase from Qwest. The system used to format your bill depends on the type of output requested during the Getting Started process and the products and/or services purchased. CRIS is one of the systems Qwest uses to bill various charges.

If you are a new CLEC and are ready to do business with Qwest, view Getting Started as a Facility-Based CLEC or Getting Started as a Reseller. If you are an existing CLEC wishing to amend your Interconnection Agreement or your New Customer Questionnaire, you can find additional information in the Interconnection Agreement.

Customer Records and Information System (CRIS) is one of the Qwest billing systems.

Some of the charges billed by CRIS are:

- Basic Business Services
- Basic Residence Services
- Centrex
- Integrated Services Digital Network-Primary Rate Interface (ISDN-PRI)
- Interim Number Portability (INP)
- IntraLATA Toll
- Local Number Portability (LNP)
- Loops
- Private Line (Digital Switched Services (DSS), Digital Service Level 1 (DS1), Digital Service Level 3 (DS3))
- Unbundled Network Element - Platform (UNE-P) Plain Old

- Commercial Solutions - Customer Questionnaire
- Common Language
- Customer Contacts
- Directory Ordering
- Early Order Opportunity
- Electronic Access
- Expedites and Escalations Overview
- Features - Unbundled
- Forecasting
- Formal Complaint Process
- Interconnection Agreements & Amendments
  - -Negotiations Template
  - -Opt-In Provisions
  - -SGATs
- Local Service Freeze
- Local Service Ordering Guidelines (LSOG)
- Long Distance Carrier Selection
- Maintenance & Repair Overview
  - -Repair Escalation List
- Manual Interfaces
- Migrations and Conversions
- Negotiations Process
- Negotiations Template Agreement
- Ordering Overview
- Pre Ordering Overview
- Proof Of Authorization /

Telephone Service (POTS)

**Availability**
Qwest CRIS billing is offered in Qwest's 14-state local service territory which are organized into three regions (Central, Eastern, Western). They are organized as follows:

| Central Region | Eastern Region | Western Region |
|---|---|---|
| Arizona | Iowa | Idaho (Northern) |
| Colorado | Minnesota | Oregon |
| Idaho (Southern) | Nebraska | Washington |
| Montana | North Dakota | |
| New Mexico | South Dakota | |
| Utah | | |
| Wyoming | | |

Each region has a separate CRIS billing system. There are some regional differences which could cause the bills to look slightly different; however, the basic information appearing on the bill will be the same.

**Bill Formats**
The bill format media is specified on the Qwest New Customer Questionnaire. If you wish to change your bill format media after initial establishment, refer to Getting Started to update your media choice and forward it to the person listed on the questionnaire.

Your CRIS bill can be received in the following media in all Qwest regions:

- Paper - The Qwest Official Bill of Record, unless one of the following electronic media is selected as the Qwest Official Bill of Record.
- EDI via Network Data Mover (NDM) (dedicated circuit)
- EDI via Value Added Network (VAN)
- EDI via File Transfer Protocol (FTP) (dedicated circuit)
- EDI via the Web
- Carrier Access Billing System/Billing Output Specifications (CABS/BOS) format in an Extended Binary Coded Decimal Interchange Code (EBCDIC) file. This format is available for UNE-P POTS and Unbundled Loop type of accounts only.

The following electronic media is available only with the CRIS paper bill as the Qwest Official Bill of Record:

- Diskette (American Standard Code (ASC)II files)
- Compact Disk Read Only Memory (CD ROM) (ASCII files)
- ASCII files via the Web
- eBilling via the Web

**CABS/BOS Format**

Letter Of Agency (LOA)

Provisioning & Installation Overview

Questionnaire - Amendment

Questionnaire - New Customer

Regulatory Commissions

Service Intervals

Single Location Routing Number

Tariff Locations

Technical Publications

Telecommunications Associations

Unauthorized Service Provider Change

USOC/FID Finder

Bill and CSR data provided in the CABS/BOS format is an EBCDIC file available via NDM only. This type of billing format is available on UNE-P POTS and Unbundled Local Loop type billing only. You must indicate on the UNE-P Amendment Questionnaire that you wish this type of format.

Deviations from the CABS/BOS standard are documented on a Differences List. If you have selected the CABS/BOS format in an EBCDIC file, then refer to Qwest's Bill Data Tape (BDT) Differences List.

The CABS/BOS format can be selected as the Qwest Official Bill of Record for UNE-P POTS and Unbundled Local Loop type billing only. When you choose the CABS/BOS format as the Qwest Official Bill of Record, the paper bill can be optionally suppressed.

CABS/BOS is a Telecom Industry Guideline format, which is copyrighted and maintained by Telcordia™. You must contact Telcordia directly in order to obtain the CABS/BOS documentation. Contact Telcordia at 800-521-2673 or http://www.telcordiatechnologies.com/ to order any or all of the CABS/BOS volumes.

The New Customer Questionnaire requires you to provide information concerning the type of bill(s) you will receive.

**Paper Bills**

Unless you otherwise specify, paper bills will be provided for all products and services ordered. The paper bill, unless otherwise specified, is considered the Qwest Official Bill of Record.

**EDI**

Another billing media option is cified, is considered the Qwest Official Bill of Record.

**EDI**

Another billing media option is Electronic Data Interchange (EDI). EDI is a series of standards for transmitting billing data electronically between companies in a structured data format. To receive and process EDI you must utilize the 811 transaction set, and you must have an EDI "translator" to translate the EDI data into a format your system can process. EDI can be delivered using one of the following methods that you select, NDM, FTP, VAN, or Web. More information regarding NDM and FTP can be found at Qwest Interconnect OSS Electronic Access. VANnications provider and then adds something of "value" to the network. It normally acts as a "mailbox" to house data for end-users.

The EDI bill can be selected as the Qwest Official Bill of Record instead of paper. When you choose the EDI bill as your Qwest Official Bill of Record, the paper bill can be optionally suppressed.

**Diskette**
Billing data is loaded onto 3.5-inch high-density diskettes. The diskette is available in a DOS format and allows stacking of multiple accounts within the same bill period. The format is compatible with many existing spreadsheets, relational databases and word-processing software data packages.

**CD ROM**
CD ROM's are produced on CD's. Available to CLECs with more than $10,000 of revenue on a single Summary Billing Number.

Both Diskettes and CD ROM's use an ASCII comma delimited format separated into logical subject areas such as payment, toll, monthly service, etc. If Diskette or CD ROM are ordered, the paper bill is considered the Qwest Official Bill of Record.

**Web**

Electronic bill delivery via the Web, is either EDI or ASCII.

A Customer Guide is available to help explain more about EDI or ASCII.

After the New Customer Questionnaire has been received at Qwest, the Qwest Implementation and Deployment Team will schedule a technical meeting with you. This Qwest group can assist you with technical aspects of receiving your bill. You will be assigned a technical contact within this group, once you are established with Qwest.

Back to Top

## Pricing

**Rates**
Cost Dockets are state-mandated rates, determined by each state Public Utilities Commission (PUC) or state regulatory agencies. You will be notified of Cost Docket rate changes when the rates in a specific Interconnection Agreement are updated. You can request a copy of the updated Interconnection Agreement from your Qwest Service Manager. You will be notified by a second notification at least 15 days prior to the implementation of the new rates in the Qwest billing system.

Back to Top

## Features/Benefits

| Features | Benefits |
|---|---|
| Summary Billing | Allows you to manage your financials at the Summary Billing Level |
| Sub-Account billing | Allows you to identify all rates and charges for services you have ordered for each specific end-user |

Back to Top

## Implementation

**Summary Billing Account Number (BAN) Establishment**

A requirement prior to any Local Service Request (LSR) activity is the establishment of the Summary Billing Account Number (BAN). The Summary BAN will be established 30 to 45 days after the New Customer Questionnaire is completed, any required deposits paid. Once the BAN is established and a Qwest Billing Service Delivery Coordinator (SDC) is assigned to your account, you will be notified of the Summary BAN number and the LSR activity can begin.

**Overview of CRIS Billing**

When you submit a LSR, Qwest will complete the requested work and send the service order(s) information to the CRIS billing system. You will receive a daily report of completed orders.

Once the CRIS billing system receives the completed service order(s), it does the following:

- Rates each Universal Service Order Code (USOC) on the order(s), based on tariff information and/or information from your Interconnection Agreement
- Updates the accounts to ensure all information is correct including end-user toll usage
- Updates the Qwest Customer Service Record (CSR) when the account is processed for billing
    - CRIS will update a Qwest CSR within three to five business days. Exception would be if the service order should error. Errors are manually worked and once the error has been fixed, then the service order will take the three to five business days to post.
    - Some errors, due to system constraints, delay the posting of the service order within the first three to five business days. Some examples of these conditions are:
        - Subsequent Order Activity
            - T&F orders
            - N&D order
            - Multiple Orders on the same Summary Ban posting on the same day that have errored.
        - Rate Table Changes
        - Contract Updates
        - Summary Bill Processing Period

You are billed out of the CRIS billing system on a Summary Bill. A Summary Bill provides one bill and payment document per month for multiple accounts, within the same state (mixed Numbering Plan Areas (NPAs) acceptable). The Summary Bill contains Sub Accounts for each end-user account number and depicts detailed charges associated with each end-user. Your Summary Bill will summarize all the billing data from the end-users accounts.

There is a limit of 6000 Sub Accounts per Summary Bill. If you have more than 6000 end-users in one state, Qwest will establish a new Summary Bill. Your Service Delivery Coordinator (SDC) will notify you a minimum of three business days prior to the new Summary Bill effective date. Once a new Summary Bill account number has been established, any new end-user accounts should not be assigned to an old Summary Bill account number. Your Qwest Billing SDC will advise you when you have reached the limit and will advise you of the new Summary Bill account number. The new Summary account number will be assigned for new services and changes as the order flows into Qwest via IMA.

The components of the Summary Account Number will include NPA, Numeric Numbering Plan (NXX), line number (XXXX), and customer code (XXX). Summary Bill accounts are assigned a unique account number, which varies by region as follows:

- Central Region - The Summary Account Number will contain an alpha character in the NXX area. An example for Colorado would be 303-B11-XXX-XXXX.

The Central CRIS region paper Summary Bills will have the NXX value converted to a numeric value. So B11 would become 111. Because this value is changed, a unique alpha letter precedes the account number and customer code. This is known as an alpha type account. The State Alpha code is assigned by state as follows:

| **STATE** | **ALPHA** |
|---|---|
| Arizona | J |
| Colorado | K |
| Idaho | L |
| Montana | M |
| New Mexico | N |
| Utah | O |
| Wyoming | P |

The account appearance on the paper Summary Bill for Colorado would be i.e., K-303-111-XXX-XXXX.

Summary Bills produced in ASCII would show 303111XXXXXXX K with the Alpha character floated behind any alpha account

Summary Bills produced in EDI would only show the numeric values. Ex: 303111XXXXXXX.

This is also the format used for Central Alpha sub accounts. The following table identifies the NPA values for each Central Alpha and the numeric conversion. Colorado examples are used but would reflect the same Alpha value to Numeric value for each Central state.

| Central only NPA Conversion Values |
|---|
| C = 2 Ex 303-C22 is the same as K 303-222 |
| D = 3 Ex 303-D22 is the same as K 303-322 |
| E = 4 Ex 303-E20 is the same as K 303-420 |
| F = 5 Ex 303-F30 is the same as K 303-530 |
| G = 6 Ex 303-G91 is the same as K 303-691 |
| H = 7 Ex 303-H22 is the same as K 303-722 |
| No I value |
| J = 8 Ex 303-J30 is the same as K 303-830 |

| K = 9 Ex 303-K89 is the same as K 303-985 |
|---|

- Western Region - The Summary Bill account for the Western Region is referred to as a "Z" account ("Z" is the prefix for the Summary Account number). An example of the account appearance for the Western region would be 206 ZXX-XXXX-XXX.
- Eastern Region - The Resale Summary Bill is referred to as an "R" account. The Resale account number consists of the Compressed area code (NPA) followed by "R", then the 2-digit billing date in the NXX field, the line number and customer code, e.g., E-R01-XXXX-XXX.

A UNE Summary Bill is referred to as a "Z" account. The UNE account number consists of the Compressed area code (NPA) followed by "Z", then the 2-digit billing date in the NXX field, the line number, customer code, e.g., E-Z01-XXXX-XXX.

The following Compressed NPA table to can be used to convert the compressed NPA to the full NPA, e.g., E-Z01-XXXX-XXX would be 712-Z01-XXXX-XXX.

| State | NPA | Compressed NPA |
|---|---|---|
| Iowa | 319<br>515<br>563<br>641<br>712 | C<br>D<br>B<br>A<br>E |
| Minnesota | 218<br>320<br>507<br>612<br>651<br>763<br>952 | 1<br>R<br>3<br>2<br>S<br>T<br>U |
| Nebraska | 308<br>402 | W<br>V |
| North Dakota | 701 | F |
| South Dakota | 605 | 9 |

CRIS identifies, formats, rates, and stores all billable call detail records until the time for the calls to be billed on the end-users Sub Account. This only applies as long as Qwest is the underlying toll provider for all toll records of usage by your end-users.

Following usage processing, CRIS produces a Daily Usage File (DUF).

If you have purchased Centrex Plus products, you can elect to receive a Station Message Detail Recording (SMDR) file.

Qwest will establish separate Summary Billing accounts, per state, for the following product groupings:

- Resale (See Note below)
- Unbundled Network Elements (UNE)
- Number Portability
- Public Access Line (PAL)
- Shared Tenant
- Unbundled Network Elements-Platform (UNE-P)

**NOTE:** For the states of Oregon and Washington, the Resale Summary Bills will be separated by Qwest Business accounts and Residence accounts.

CSR data is created when service order activity takes place on a Sub Account. Specific information is created for every main Billing Telephone Number (BTN) and Working Telephone Number (WTN). This includes all bill, listing, service and/or feature information, per line, for each account. CSRs can be requested in either paper or ASCII format (CD ROM/ Diskette/Web). NOTE: Click on the ASCII link to identify the state location. Once your state selection is made, the ASCII reference material will be accessed.

To request paper format CSR's refer to the Pre Ordering Overview.

To request ASCII format CSR's contact your Qwest Service Manager.

If EBCDIC billing files in CABS/BOS format are ordered, CSR information will also be included. Each sub account CSR requested appears in the same CABS/BOS format and will be delivered with the EBCDIC file.

Summary Bills and Sub Accounts must have the same bill date. Each Summary Bill is composed of various sections as follows:

- Common Heading
- Account Summary
- Summary of Accounts

Bills are calculated as follows:

- All Sub Account charges, including recurring, non-recurring, usage, taxes, surcharges, mileage, and adjustments are calculated.
- All charges from associated Sub Accounts are summarized at the Summary Account Level.
- Any payments, adjustments, past due charges, late payment charges if applicable, and/or resend charges are applied.

The following table provides some basic examples of commonly found bill charges. These charges could appear on the Summary Bill or Sub Accounts billing. (NOTE: Refer to either your individual Interconnection Agreement or the tariff for applicable rates and calculations).

| Charge | Basic Description |
|---|---|
| | |

| | |
|---|---|
| Cancellation Charges | • Charge applied when a requested service is cancelled. (Applicable charge will depend upon how far the request for service has progressed in the ordering process) |
| Expedite Charges | • Charge applied when you request services in less than a standard time frame<br>• Does not apply for Unbundled Loop |
| Fractional | Determining the daily rate in all three regions:<br>• When service does not span an entire bill period (e.g., new connect or disconnect), the monthly recurring charge is prorated to bill or credit from the date the service was installed or disconnected. The pro-ration calculation is: rate per monthly recurring charge divided by 30 days equals the daily rate.<br><br>Determining the actual number of days billed:<br>• Calculating the number of days to bill (fractionals) in the Eastern and Western Regions use the actual calendar days. For example, assume using October 29th as a new service connect with a bill date of November 2nd. The billing start date would be October 30th. Counting the actual days, would be October 30th, October 31st and November 1st. The Eastern and Western Regions would bill three days.<br>• Calculating the number of days to bill (fractionals) in the Central Region always assumes a 30 day month. Using the same October 29th new service connect with the same November 2nd bill date, the billing start date would also be October 30th. Based on a 30 day month the days to bill would be October 30th and November 1st. The Central Region would bill 2 days. |

| | |
|---|---|
| Deposit Interest Credits | • Credit assessed on money received in error<br>• Credit assessed on money received to secure service (deposit)<br>• Such credits are based on your Interconnection Agreement or tariff language |
| Late Payment Charges | • Charge assessed when payment for a bill is not received in a specified time frame<br>• Such charges are based on your Interconnection Agreement or tariff language |
| Minimum Billing Period | • The minimum period for which services are provided and for which rates and charges are applicable.<br>• When a service is discontinued prior to the expiration of the minimum period, charges are applicable, whether the service is used or not<br>• Minimum Billing Periods may not apply to all types of services |
| Non Recurring | • A charge for specific work activity (e.g. an installation charge)<br>• Rates are either contained in your Interconnection Agreement or tariffed. |
| Out of Service Credits/ Adjustments | • Credits assessed when a circuit or service is not working.<br>• Such credits can vary from product to product and may not apply in some instances based on your Interconnection Agreement or tariff language |
| Primary Interexchange Carrier (PIC)/Local Primary Interexchange Carrier (LPIC) Change Charge | • Charge assessed to change pre-selected InterExchange Carrier (IXC) or local Toll Provider |

| | |
|---|---|
| Recurring | • Flat rated monthly charges that apply to each bill period or fraction thereof<br>• Rates are either in your Interconnection Agreement or tariffed.<br>• For billing purposes, each bill period is based on 30 days |
| Subscriber Line Charge/ Presubscribed Interexchange Carrier Charge (PICC) | • Charge assessed to your end-user for access to long distance. |
| Surcharges | • Various surcharges accessed by a governing body may be added to the bill, including but not limited to,: 911, Telephone Relay System (TRS), and LNP Cost Recovery |
| Taxes | • Charges assessed by a governing body on services or products provided. Refer to Taxes and Tax Exemptions for more information. |
| Testing Charges | • Charges applied to provide a Qwest technician to perform network testing (refer to specific product to determine if charges apply) |
| Usage Charges | • Charges can be applied on a per minute of use, a per call, or per query basis.<br>• Usage Charges can include the following:<br>IntraLATA Toll (Local Access and Transport Area) Local Measured Service<br>Pay Per Use items (i.e., 3 Way Calling, Last Call Return, 976 Calls) |

**Toll Guide Information**
To ensure correct billing, Qwest uses a Toll Guide record. This record resides within CRIS and is able to identify and ensure that once any type of usage has been processed through CRIS, it is correctly stored and passed to the correct billing number. A Toll Guide is created for each main line and each additional line. Toll Guides may change at times, such as when service orders are issued that add, change, or delete any of the following:

- Telephone number
- Account number
- Calling plan
- The end-user responsible for the account

A Toll Guide is a telephone number and date-based record which reads the billing number and the date of the usage record to identify which account should be billed that usage. This also ensures that accounts, which have changes, are billed for the correct usage. The guide is not time sensitive, only date sensitive.

When a new account is established, the completion date on the service order will be the Toll Guide established date. When a service order has been issued to establish service on a specific date, any toll from that date forward will be guided to that account until a change or disconnect occurs. For example, a new service order completion date is 6-1-01, the account and guide will establish on the same date, 6-1-01, unless the new account is associated with a disconnect on the same day. In this case, the new guide will establish on the next date, 6-2-01.

When a CLEC responsible for a service is changing, the new account information and Toll Guide establish date will be the completion date plus one-day. This allows the system to final out the old account and Toll Guide effective with the service order date. The new account is established along with the guide the following day. For example, if a change of responsibility service order is completed on 6-1-01 the new account information would be established 6-2-01. This allows any usage created for the old account on 6-1-01 to be properly guided and billed to the old account. This applies to all retail and wholesale migration scenarios including the following types of account migrations:

- CLEC to CLEC
- Retail to UNE-P
- Retail to Resale
- Resale to UNE-P
- Resale to Retail
- UNE-P to Resale
- UNE-P to Retail

When disconnect orders are issued, the service order completion date is used as the date of final service for that account. For example, a disconnect is issued with a completion date of 6-1-01, the guide would show an end date of 6-1-01.

**Disputes and Claims**
Once billing has occurred and if you question charges on your bill, you should contact the Qwest Billing SDC assigned to your account. If the Qwest Billing SDC cannot resolve the question, you must submit a written, documented claim for the disputed amount.

The following outlines information you may be requested to supply in your written claim for dispute, if applicable:

- Company Name
- Contact Name, Address, Telephone Number and Email Address
- Date of Claim
- Claim Number/Audit Number
- Product or Service being disputed
- Access Customer Name Abbreviation (ACNA)/Reseller Identification (RSID)
- BAN
- Invoice Number
- Bill Date

- Dispute Reason/Dispute Description
- Dispute Amount
- Dispute From and Through Dates
- Rate Element(s) or USOC(s)
- Jurisdiction
- Factor Information (e.g., Percent of Interstate Usage (PIU), Percent Local Usage (PLU), Border Interconnection Percentage (BIP), other)
- State
- LATA
- Purchase Order Number (PON)
- Telephone Number (TN)
- Exchange Carrier (EC) Circuit ID
- Interexchange Carrier (IC) Circuit ID
- Circuit Location
- Carrier Facility Assignment (CFA)
- End Office Common Language® Facility Identification (CLLI™)
- Usage quantity in dispute

Qwest recommends you pay the total amount due by the Specified Due Date on your bill, even if a claim for dispute exists.

Qwest will provide acknowledgment of your written documented claim of dispute within two business days of receipt. The Qwest Billing SDC will investigate and attempt to resolve the claim of dispute within 30 calendar days. If the Qwest Billing SDC is unable resolve the claim within the 30 calendar days, a status update will be provided to you. Once the claim is resolved, the Qwest Billing SDC will provide the results of the investigation to you in a dispute resolution letter. If a credit is warranted, information regarding an adjustment to the account may be included in the resolution letter.

If the dispute is not resolved in your favor, you could be subject to a Late Payment Charge, if you have not paid the full amount due while the item(s) is in dispute. You should refer to the specifics of your Interconnection Agreement for information concerning Late Payment Charge.

**Rate Validation**
Qwest has a process for validation of rates. When Qwest determines a billed rate correction is necessary, you will be notified by your Qwest Billing SDC at least 10-days prior to the correction being made. The 10-day window will begin when the Qwest Billing SDC sends a detailed Rate Change Notification form to you. The Rate Change Notification form will include information explaining the old and new rates, effective date of the correction, etc.

There are three different Rate Correction Notifications Forms that may be received depending on the product/service that is being corrected. The forms are as follows:

- CLEC Identification (ZCID) Rate Notification Form
- ZCID Rate Notification Form Guide
- Resale Correction Notification Form
- Resale Correction Notification Form Guide
- Usage Rate Correction Notification Form
- Usage Rate Correction Notification Form Guide

You may contact your Qwest Billing SDC regarding any questions you

have regarding the Rate Validation process and/or Rate Change Notification form.

**Bill Resend**
There may be times when you wish to have a copy of a bill resent to you. To do this, you should contact your Qwest Billing SDC.

- Paper Bill - It normally will take 7-10 days for you to receive the requested bill. It is provided by CRIS and there is no additional charge for a paper copy.
- EDI and Web Bill Media - It normally will take two business days for you to receive the requested bill.
- Diskette or CD-ROM - It normally will take seven business days for you to receive the requested bill.

EDI, Web, Diskette or CD ROM may only be available up to 90 days from the bill date. After 90 days there is a potential that the information is no longer available.

When EDI, Diskette or CD ROM resends are requested, you should refer to the specifics of your individual Interconnection Agreement for information regarding the charges for these services.

If you have requested a resend of a bill and the time frame has passed in which you should have received it, you should contact your Qwest Billing SDC.

Back to Top

## Training

Web-based training is available to assist in the interpretation of the various sections of the bill.

**Qwest 101: "Doing Business With Qwest"**

- This introductory instructor-led training 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 billing and support systems, processes for submitting service requests, reports, and web resource access information. Click here to learn more about this course and to register.

**Introduction to Service Requests & Billing for CLECs**

- This multimedia self-directed process and systems training course is designed to provide you with information to identify the required Access Service Request (ASR) and Local Service Request (LSR) forms, and how to complete the forms to request various services from Qwest. Click here to learn more about this course and to register.

Click here for more information and to register for this class.

View additional Qwest courses by clicking on Course Catalog.

Back to Top

## Contacts

Billing Questions, Disputes and Resends

- Assigned Qwest Billing SDC (Refer to the telephone number printed on your bill). If you are not sure whom to contact, you should call your assigned Qwest Service Manager.

Bill Media Technical Questions (Once Established)

- Contact your Qwest Service Manager

Back to Top

## Frequently Asked Questions (FAQs)

**1. What information is NOT included when the bill is produced on disk?**

- OCR Return Document
- Page numbers
- Subtotals
- Major headings
- Logo symbols or carrier names
- Disclaimers, advertising narratives, informational legends
- Line numbers for toll detail
- Anything printed on the back of the bill

A customer guide describing the formats and data content within the diskette is provided to you to assist you in reading the bill.

**2. What is EDI?**
EDI is a series of standards for transmitting billing data electronically between companies in a structured data format. For you to receive and process EDI transmissions you must utilize the 811 transaction set, requiring you to have an EDI "translator" at your end to translate the EDI data into a format your particular system can process. When you order EDI service you will be provided with an EDI Customer Guide.

**3. Can a dispute be issued verbally?**
No, all billing disputes must be submitted in writing.

Back to Top

**Last Update:** July 16, 2004

Resources

CMP

- CMP Home
- CMP Document
- Team Meetings
  - Archive
- Change Requests (CRs)
  - Archive
- CMP Redesign
  - Archive
- Document Review
  - Product/Process Archive & Responses
  - System Archive & Responses
- CMP Oversight Committee
- Escalations/Disputes
  - Initiation
  - Ongoing Escalations
  - Archive
- OSS Hours of Availability
- CMP Points Of Contact (POCs)
- Customer Notification Letter Archive
- CMP Calendars
- OSS Interface Releases
- Team Meetings



# Open System CR SCR100104-01 Detail

## Title: Provide Circuit ID on Billing Outputs for the Shared Loop Family of Products

| CR Number | Current Status Date | Level of Effort | Interface/ Release No. | Area Impacted | Products Impacted |
|---|---|---|---|---|---|
| **SCR100104-01** | Denied 12/6/2004 | - | Wholesale Billing Interfaces/ | Maintenance, Repair, Provisioning | UNE, Line Sharing, Line Splitting, Loop Splitting |

**Originator:** Berard, John

**Originator Company Name:** Covad

**Owner:** Winston, Connie

**Director:** Winston, Connie

**CR PM:** Esquibel-Reed, Peggy

## Description Of Change

Covad requests the circuit id be provided on billing output files such that CLECs can accurately reconcile billing from Qwest. Covad believes Qwest houses the circuit ID but does not pass that information on its billing records. The BTN provided is not sufficient enough for Covad to validate the bills, thus the request for this additional information.

Expected Deliverable:

That Qwest extract the circuit id and provides on all shared loop billing outputs/As soon as possible.

## Status History

| Date | Action | Description |
|---|---|---|

Other System Links

CMP

CMP Home

CMP Document

Team Meetings
Archive

Change Requests (CRs)
Archive

CMP Redesign
Archive

Document Review
Product/Process Archive & Responses
System Archive & Responses

CMP Oversight Committee

Escalations/Disputes
Initiation
Ongoing Escalations
Archive

OSS Hours of Availability

CMP Points Of Contact (POCs)

Customer Notification Letter Archive

CMP Calendars

OSS Interface Releases
Team Meetings

Other System Links

| | | |
|---|---|---|
| 10/6/2004 | Info Received From CLEC | Received Covad's Availability for Clarification Call |
| 10/6/2004 | Clarification Meeting Scheduled | Clarification Meeting Scheduled for October 14, 2004, based on Covad's Availability. |
| 10/19/2004 | Clarification Meeting Held | See Project Meetings Section for Meeting Minutes |
| 10/20/2004 | Discussed at Monthly CMP Meeting | Discussed at the October Systems CMP Monthly Meeting; please see the October Systems CMP Distribution Package, Attachment B |
| 10/1/2004 | CR Submitted | |
| 10/5/2004 | CR Acknowledged | |
| 10/5/2004 | Info Requested from CLEC | Email Sent to Covad Requesting Clarification Meeting Availability |
| 11/17/2004 | Discussed at Monthly CMP Meeting | Discussed at the November Systems CMP Monthly Meeting; please see the November Systems CMP Distribution Package, Attachment I |

## Project Meetings

December 6, 2004 Email Sent to john Berard, Covad: John, Attached is a copy of SCR100104-01 Provide Circuit ID on Billing Outputs for the Shared Loop Family of Products. This attachment contains Qwest's response to the request. Peggy Esquibel-Reed Qwest CMP CRPM Peggy.Esquibel-Reed@qwest.com

-- November 17, 2004 Systems CMP Meeting Discussion: Jill Martain/ Qwest stated that this CR is currently in Evaluation and that Qwest is looking at potential solutions.

-- October 20, 2004 Systems CMP Meeting Discussion: Liz Balvin/Covad stated that the CR is for billing outputs for the Shared Line products. Liz stated that these are in the POTS flow and noted that Qwest validates on the AN Field. [Comment Received from Covad: Liz stated that these are in the POTS flow which as she understands means Qwest validates on the AN Field instead of the circuit id field. Susie Bliss/Qwest stated that she believes that is per the request of the CLECs. Liz Balvin/Covad stated that Qwest is the only ILEC that is tracking the Shared Line products using the BTN. Liz stated that Covad tracks to the circuit id. Liz stated that the bill reflects the Qwest BTN and is not the WTN that was on the order. Liz stated that this causes Covad to be out-of-synch for bill validation. Liz stated that if Qwest houses the circuit id, that it be placed on the bill. [Comment Received from Covad: Liz stated that the bill reflects the Qwest BTN which may or may not be the WTN that was on the order plus the addition of the unique customer code provided only adds additional out-of-synch conditions from order to bill validation. Liz stated that if Qwest houses the circuit id anywhere in their back-end systems, that Covad requests it be placed on the bill.] There were no other comments or

questions. Jill Martain/Qwest stated that this CR will move into Presented Status.

- October 14, 2004 Clarification Meeting

Attendees: John Berard (Covad) Liz Balvin (Covad) Peggy Esquibel-Reed (Qwest) Brenda Kerr (Qwest) Alan Zimmerman (Qwest) Wendy Thurnau (Qwest)

Review Requested (Description of) Change: Peggy Esquibel-Reed (Qwest) reviewed that Covad requests the circuit id be provided on billing output files such that CLECs can accurately reconcile billing from Qwest. Covad believes Qwest houses the circuit ID but does not pass that information on its billing records. The BTN provided is not sufficient enough for Covad to validate the bills, thus the request for this additional information. Peggy stated that the Expected Deliverable is that Qwest extract the circuit id and provides on all shared loop billing outputs/As soon as possible.

Obtain the Business Need from the CR Originator: Peggy Esquibel-Reed (Qwest) asked if the business need that prompted this CR was for bill validation only. John Berard (Covad) stated yes.

Confirmed Impacted Area(s): Peggy Esquibel-Reed (Qwest) asked to confirm that this CR was for Maintenance & Repair and Provisioning. John Berard (Covad) responded yes.

Confirmed Impacted Interfaces: Peggy Esquibel-Reed (Qwest) asked to confirm that this CR was submitted for changes to Wholesale Billing. John Berard (Covad) stated yes.

Obtain Specific Billing Output Files: Peggy Esquibel-Reed (Qwest) asked for which specific Billing Output Files that this request was to include. Liz Balvin (Covad) asked why the question was being asked. Peggy Esquibel-Reed (Qwest) stated that Qwest needs to obtain as much information as we can during the Clarification Call in order to ensure that the request is fully understood and to prevent problems/issues from occurring in the future regarding the implementation of the request. Peggy asked Covad to please identify the Billing Output Files that Covad is requesting that this CR accommodate. Peggy listed the files of ASCII, Paper, EDI, BOS/BDT, and/or Billmate. John Berard (Covad) stated that he believed that Covad received BOS/BDT files and stated that he would need to confirm. Alan Zimmerman (Qwest) stated that Covad may be receiving Billmate or ASCII files. John Berard (Covad) stated that he would check and confirm.

Confirmed Impacted Products: Peggy Esquibel-Reed (Qwest) asked to confirm that this CR is only for the Products listed on the CR: UNE, Line Sharing, Line Splitting, and Loop Splitting. John Berard (Covad) stated yes.

Additional Discussion Regarding the CR: Peggy Esquibel-Reed (Qwest) asked Covad if they had additional information regarding the request. Covad stated that there was no additional information to add. Alan Zimmerman (Qwest) stated that currently these are in the POTS flow, not the design flow and that there is no circuit id in the POTS flow. Alan asked if Covad's intent was to move to the design flow. John Berard (Covad) responded no and indicated that he has seen EDI output in a circuit id format, containing alpha's and numerics. John stated that Qwest may just not call it a circuit id but that is what Covad is looking for. Liz Balvin (Covad) asked Qwest to define a design flow. Alan Zimmerman (Qwest) stated that the circuit ids would be obtained from LFACS and is TN based

inventory; that is the design flow. Alan Zimmerman (Qwest) stated that currently the FOC has a circuit id with the TN format. Liz Balvin (Covad) stated that there is a circuit id on the FOC but what Covad needs captured on the bill is the circuit that is provisioned. Liz stated that is the true validation step. Liz noted that the BTN is the AN plus the customer code. Liz stated that she has seen examples where the TN is not equivalent to what is sent on the orders, on the Loop Order Form. Alan Zimmerman (Qwest) stated that in the design flow the circuit id would be important but in the POTS flow it is not important and is not retained anywhere. Liz Balvin (Covad) provided 2 examples that provided circuit ids. Liz provided PONs, BTNs, and circuit id's received. Liz Balvin (Covad) stated that Covad does not want to move to the design flow, she realizes that it would be a huge effort. Liz Balvin (Covad) stated that if Qwest has the circuit id, Covad would like it on the billing output. Alan Zimmerman (Qwest) asked if Covad did not have the account numbers and stated that the BTNs are included in the FOCs. Liz Balvin (Covad) stated that she has the AN plus the customer code. Alan Zimmerman (Qwest) asked how that information could not be used for bill validation. Liz Balvin (Covad) stated that for every other ILEC, they validate by the circuit id. Liz stated that Covad would like Qwest to be consistent with the other RBOCs as Covad would have to make coding changes in order to accommodate the BTN. Liz stated that Covad does not provide the customer code, that Qwest provides it and Covad strips it off. Alan Zimmerman (Qwest) asked if that is difficult for Covad to do. Liz Balvin (Covad) stated that it would be a significant change since all the other RBOCs go by the circuit id. Alan Zimmerman (Qwest) stated that Qwest understands the request and stated that Qwest would review the request. Peggy Esquibel-Reed (Qwest) asked if there any other comments or questions. There were no additional questions or comments.

Establish Action Plan & Resolution Time Frame: Peggy Esquibel-Reed (Qwest) stated that this CR is due for presentation at the October 20, 2004 Systems CMP Meeting and that Qwest would provide the response/ status in November 2004.

## QWEST Response

Revised Response December 6, 2004

To: John Berard Covad

CC: Jill Martain, Peggy Esquibel-Reed, Connie Winston

RE: SCR100104-01 Provide Circuit ID on Billing Outputs for the Shared Loop Family of Products

SCR Description: Covad requests the circuit id be provided on billing output files such that CLEC's can accurately reconcile billing from Qwest. Covad believes Qwest houses the circuit ID, but does not pass that information on its billing records. The BTN provided is not sufficient enough for Covad to validate the bills, thus the request for this additional information.

Expected Deliverable: That Qwest extract the circuit id and provide it on all shared loop billing outputs as soon as possible.

History: A clarification meeting was held on October 14, 2004 with Covad and Qwest representation. At this meeting the request was reviewed and no further questions were required.

Qwest Response: Below is a high level itemization of the LOE for this request. The complexity and cost for this request spans multiple systems from ordering through billing. In addition to the changes to implement this new functionality, the existing accounts would have to be converted to support the enhancements to the circuit ID.

Consequently, Qwest is respectfully denying your request for SCR100104-01, due to economic infeasibility.

Cost Summary: Changes to Ordering Systems $ 25,500 Changes to Billing Systems 828,500 Process Changes 50,000 TOTAL $904,000

Qwest

- DRAFT RESPONSE

November 5, 2004

RE: SCR100104-01 Provide Circuit ID on Billing Outputs for the Shared Loop Family of Products

Qwest has reviewed the information submitted as part of Change Request SCR100104-01. Based upon research that has been conducted following the Clarification Meeting (held October 14, 2004) and the October 20, 2004 Systems CMP Meeting Qwest is still examining the issue. Qwest will continue to research the problem and provide an updated response at the December Systems CMP Meeting.

Sincerely, Qwest

<Back

**Information Current as of 12/8/2004**

Escalation #SCR100104-01ES33

February 24, 2005

Liz Balvin
Covad Communications

Subject: Covad Escalation on SCR100104-01ES33 associated with Qwest denial of this SCR citing economic infeasibility

This letter and attachment is Qwest's binding response to your February 16, 2005 escalation regarding CLEC Change Request number SCR100104-01ES33 "Provide Circuit ID on Billing Outputs for the Shared Loop Family of Products**"** and Covad's request to implement this SCR.

Qwest has reviewed the formal escalation and maintains its position that the estimated $904K to address the requirements of this SCR are reasonable and accurate. The attached document provides clarification on the how the $904K estimate was developed.

Based on this additional detail, Qwest is continuing to maintain the denial of SCR100104-01ES33. This additional information will hopefully provide the background and rationale for this denial and will make it more understandable.

Connie Winston
Qwest Wholesale
Manager Information Technology

Attachment

ATTACHMENT

# Covad Escalation SCR100104-01
# Qwest Response

**Description Escalation**

Covad requests implementation of change request SCR100104-01 titled "Provide Circuit ID on Billing Outputs for the Shared Loop Family of Products"

**History of SCR100104-01**

Covad's change request was denied for economic infeasibility. An estimated 904K would be the cost for multiple programming changes to multiple systems.

**Qwest response to Escalation**

**Covad**

Covad believes that given the following facts, Qwest's estimated 904K is unreasonable and must be reconsidered;

**Qwest Response**

Qwest believes that the estimated 904K is reasonable and accurate. Qwest would like to provide clarification on the below statements provided by Covad.

**Covad**

1) Qwest provides a TN based circuit ID (state code, service code + 10 digit TN) in the ECCKT field on the shared loop Firm Order Confirmation (FOC) notifications. Covad has requested that this information be passed to our billing output files.

**Qwest Response**

Qwest does provide a form of a TN based circuit ID in the ECCKT field on the shared loop FOC. This TN based circuit ID is derived from the end user's telephone number provided in the AN field of the LSR that the CLEC populates. The cost to pass the TN based circuit ID from a CLEC populated field on the LSR to the CRIS billing output file would be, as previously stated to Covad, an estimated 904K. This estimate specifically covers passing the ECCKT field or some other FID value to the bill, and it does not include costs for changes in bill validation or the non-design provisioning flow for Line Sharing.

**Covad**

2) Qwest CRIS systems house an ECCKT field, available for population of the TN based circuit id for shared loop orders.

**Qwest Response**

The CRIS system utilized by Qwest does not house an ECCKT field for Shared Loop accounts. The CRIS system does include a CKT ID field used for design services. Because Line Sharing is a non-design flow, it does not utilize this field.

**Covad**
3) Qwest billing output files for shared loop services makes available for population the billing circuit ID field.
**Qwest Response**
Qwest billing output files for shared loop do not include any circuit ID information today. To add this information is included in the estimated cost of 904K.

**Covad**
4) Covad has not suggested that Qwest need change their methodology for validating shared loop bills in any way.
**Qwest Response**
Qwest appreciates that Covad has not suggested a change in their methodology for validating shared loop bills. Qwest's estimate does not include a change in their bill validation process.

**Covad**
Business need and impact: Qwest unique billing methodology (tracking to a "Special Billing Number") causes Covad to manual validation its shared loop bills. Covad requests in addition to the SBN, that Qwest provide the TN based circuit ID on our shared loop billing output files to reduce the need for manual intervention.
**Qwest Response**
The billing methodology which utilizes a sub account number has been in place for some time, and is used for Unbundled Loops, on which CLECs ask Qwest to model Line Share processes. Data provided on the FOC may be used by CLECs to cross reference fields such as the ECCKT to the sub-account number.

**Covad**
· Desired CLEC resolution: That Qwest reconsider the changes requested in support of Covad's business needs.
**Qwest Response**
Qwest maintains denial of SCR100104-01. Qwest also maintains the estimated cost of 904K for programming changes to enable the TN based circuit ID to be passed to the Qwest CRIS billing output files. The TN based circuit ID is derived from a state code, service code, and the 10 digit TN that is populated by the CLEC in the AN field on the LSR.

Qwest investigated multiple options to bring the TN based circuit ID forward. Whether Qwest utilizes the existing ECCKT field, or another FID, as described below, it would not diminish the cost estimate. The ECCKT for design services appears behind a 'CLS' FID on design service accounts, and the design circuit is assigned and maintained in our TIRKS system. The purpose of developing a new FID to float the TN based circuit ID used in Line Sharing, is because of programming differences, as it will need to be derived from the LSR instead of TIRKS.

In order to get the TN based circuit ID populated on the Line Share billing Customer Service Record, Qwest would be required to do the following steps listed in the below table.

| **Changes to Ordering Systems $25,500** | |
|---|---|
| FID development & implementation into the Ordering systems | Develop new Telcordia approved Field Identifer (FID) |
| Enhancements to IMA to pass the TN based circuit ID to the ordering system | IMA AN field required to pass TN data to service ordering systems to populate data. |
| Enhancements to service order creation and distribution systems | Programming to populate the TN based circuit ID behind newly created FID. |
| Implementation of edits for downstream accuracy | Edits to prevent formatting errors. |
| System specific testing | Each system impacted conducts testing of changes. |
| End to end testing for all ordering system changes | All ordering systems conduct an end to end testing to ensure ordering components are correct. |
| Regression testing | Execution of a series of test cases to ensure other functionality continues to perform as expected. |
| **Changes to Billing Systems $828,500** | |
| **Updating Existing Line Sharing Accounts:** | |
| Define and code the program(s) to create the new FID data | Create logic to assign state code, service code, and end user's 10 digit TN that was populated on the original AN field of the LSR. |
| Execute program(s) to insert the new FID and the corresponding data to the billing account records for the existing Line Sharing accounts | Update the existing accounts. |
| Create reports to allow for manual intervention for fallout | Assess fallout and address manual intervention to ensure accuracy.* |
| Create new customer account records and update the appropriate systems | Creates new CSRs for these updated accounts. |
| **Enhancements to Support New FID and Data:** | |
| Implement the new FID into the billing systems by region | Implementation of newly developed FID and floated data in billing systems. |
| Enhance service order posting to the billing systems to accept the new FID and associated data from ordering | Bill post updates. |
| Allow for FID retention in the billing account record and make it available for the customer account record | Implement FID and floated data retention on Line Share billing CSR. |
| Allow for CSRs to be updated with the | New FID and data will be on the CSR. |

| | |
|---|---|
| new FID and associated data | |
| Pass the new FID and data to the bill presentation/staging area for bill output | Allows the new FID and corresponding data to be on the bill output at sub account level. |
| Individual billing system testing | Each system impacted conducts testing of changes. |
| End to end testing for all billing system changes | All billing systems conduct end to end testing to ensure billing account and customer components are correct. |
| Regression testing | Execution of a series of test cases to ensure other functionality continues to perform as expected. |
| **Process Changes $50,000** | |
| Internal Documentation Implementation | Qwest documentation and notification |
| External Documentation Implementation | CLEC documentation and notification |
| Internal Training and Development | Qwest training and development |
| | |

* Overall cost may increase due to manual intervention caused by significant fallout

Products & Services

Local Business Procedures

Local 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
- Commercial Agreements

# Geographic Deaveraging - General Information - V18.0

History Log

## Description

Geographic Deaveraging is a method of determining the rate structure based on geographic regions. Deaveraged rates are determined by the distance from the central office to the end-users location or rate zone by wire center. The method of deaveraging and applicable products are determined by each state commission and may vary by state.

Geographic Deaveraging applies to the following products:

- Unbundled Local Loop
- Unbundled Network Elements - Platform (UNE-P)
- Unbundled Network Elements Combinations (UNE-C)
- Sub-Loop

**Availability**
Geographic Deaveraging is applicable throughout Qwest's 14-state local service territory.

Back to Top

## Pricing

**Rates**

Rates and/or applicable discounts are available in Exhibit A or the specific rate sheet in your Interconnection or Resale Agreement.

Upon request, Qwest will send revised rate sheets to identify applicable zones, and associated rates. Contact your Qwest Service Manager to place a request.

To request a copy of the zones for the state(s) in which you are

- Commercial Solutions - Customer Questionnaire
- Common Language
- Customer Contacts
- Directory Ordering
- Early Order Opportunity
- Electronic Access
- Expedites and Escalations Overview
- Features - Unbundled
- Forecasting
- Formal Complaint Process
- Interconnection Agreements & Amendments
  - -Negotiations Template
  - -Opt-In Provisions
  - -SGATs
- Local Service Freeze
- Local Service Ordering Guidelines (LSOG)
- Long Distance Carrier Selection
- Maintenance & Repair Overview
  - -Repair Escalation List
- Manual Interfaces
- Migrations and Conversions
- Negotiations Process
- Negotiations Template Agreement
- Ordering Overview
- Pre Ordering Overview
- Proof Of Authorization /

operating, contact the state utility commissions.

**Tariffs, Regulations and Policies**

Tariffs, regulations and policies are located in the state specific Tariffs/ Catalogs/Price Lists.

Back to Top

## Implementation

In the following states, Geographic Deaveraged rates are determined by the distance from the Central Office to the end-user's location:

- Montana
- Wyoming

You can determine the Geographic Deaveraged rate for the states using distance from the central office to the end-user location by using Address Validation in Interconnect Mediated Access (IMA). The Geographic Deaveraged rate for the address is located in the Rate Zone field (RTZ).

Address Validation returns either a two or four character rate zone. When four characters are returned, the last two characters are always alpha numeric. If only two characters are returned, the address is considered to be in the base rate area for those states that have a base rate zone pricing or Zone 1 for those states that start their deaveraged zone pricing with Zone 1. The last two characters are the zone the address is in and the rate is deaveraged.

Examples:

RTZ 01U2: the U2 indicates the rate is deaveraged for zone 2.

RTZ 02: indicates the address is in the base rate area, no deaveraged zone rate applies.

In the following states, Geographic Deaveraged rates are determined by the wire center:

- Arizona
- Colorado
- Idaho
- Iowa
- Minnesota
- North Dakota
- Nebraska
- New Mexico
- Oregon
- South Dakota
- Utah
- Washington

For additional information on Geographic Deaveraging rate zones by wire center and to obtain the Common Language Location Codes (CLLI™)

Letter Of Agency (LOA)

Provisioning & Installation Overview

Questionnaire - Amendment

Questionnaire - New Customer

Regulatory Commissions

Service Intervals

Single Location Routing Number

Tariff Locations

Technical Publications

Telecommunications Associations

Unauthorized Service Provider Change

USOC/FID Finder

refer to MSA & Geographic Zone Data

If necessary, you can determine the CLLI by using the InterCONNection (ICONN) Database and entering the Numbering Plan Area (NPA) and Numeric Numbering Plan (NXX) using the Central Office Find option. The database will return the CLLI associated with the applicable wire center.

**Pre-Ordering**

General pre-ordering activities are described in the Pre-Ordering Overview.

Requirements for pre-ordering are described in Local Service Ordering Guidelines (LSOG) Pre-Order.

**Ordering**

Refer to your individual product guidelines.

Back to Top

**Billing**

The system used to format your bill depends on the type of products purchased.

Customer Records and Information System (CRIS) billing is described in Billing Information - Customer Records and Information System (CRIS).

Integrated Access Billing System (IABS) billing is described in Billing Information - Integrated Access Billing System (IABS).

Back to Top

## Training

**Qwest 101: "Doing Business with Qwest"**

- This introductory instructor-led training 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 billing and support systems, processes for submitting service requests, reports, and web resource access information. Click here to learn more about this course and to register.

View additional Qwest courses by clicking on Course Catalog

## Contacts

Qwest contact information is available in the Wholesale Customer Contacts.

Back to Top

**Last Update:** October 8, 2004

Products & Services

Business Procedures

Local 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
- Commercial Agreements

# MSA & Geographic Zone Data for Pricing, Density, and Maintenance and Repair Intervals

Qwest provides specific information to aid customers in determining pricing, density, product availability, and provisioning/repair intervals. These are provided in several formats including Geographic Deaveraged Zone Tables, Network Identified Wire Center, Rate Centers Maps by Metropolitan Statistical Areas (MSA) Zones and Rural Statistical Area (RSA) Zones, and Interval Tables for Network Wire Centers.

- Geographic Deaveraged Zones by Wire Center
- Network Identified Wire Center
- Rate Center Maps
- Service Intervals by Network Wire Center

## Geographic Deaveraged Zones by Wire Center

Geographic Deaveraged Zones are applicable to specific product offerings and determined by each state commission. See Geographic Deaveraging - General Information for additional information.

Select the state below to view Geographic Deaveraged Zones by Wire Center:

- Arizona
- Colorado
- Idaho
- Iowa
- Minnesota
- North Dakota
- Nebraska
- New Mexico
- Oregon
- South Dakota
- Utah
- Washington

**Last Update:** October 8, 2004

- Commercial Solutions - Customer Questionnaire
- Common Language
- Customer Contacts
- Directory Ordering
- Early Order Opportunity
- Electronic Access
- Expedites and Escalations Overview
- Features - Unbundled
- Forecasting
- Formal Complaint Process
- Interconnection Agreements & Amendments
  - -Negotiations Template
  - -Opt-In Provisions
  - -SGATs
- Local Service Freeze
- Local Service Ordering Guidelines (LSOG)
- Long Distance Carrier Selection
- Maintenance & Repair Overview
  - -Repair Escalation List
- Manual Interfaces
- Migrations and Conversions
- Negotiations Process
- Negotiations Template Agreement
- Ordering Overview
- Pre Ordering Overview
- Proof Of Authorization /

## Network Identified Wire Center

The Network Identified Wire Center table provides information to relate Qwest's Wire Centers by Metropolitan Statistical Area and Qwest designated zones. The table can be used to determine provisioning and maintenance intervals.

## Rate Center Maps

Rate Center Maps display geographic coverage in Qwest's 14-State Local Service Territory. These wire center maps are displayed as MSA and RSA zones by state.

## Distribution Area (DA) Maps

The Distribution Area (DA) Map is at a wire center level and used to determine which DAs serve a particular area. The DA Map also contains the DA number that is needed on the order form.

Determine service area coverage within Qwest's 14 state local service territory by viewing the Distribution Area (DA) Maps. DA Maps are displayed by selecting a state and a wire center.

## Service Intervals for Maintenance and Repair

The Wholesale Service Interval Guides for Resale, Unbundled Network Elements (UNEs), and Interconnection Services provide details on Qwest's intervals for maintenance and repair based on network wire centers. See the Service Interval Guide for this information.

Letter Of Agency (LOA)

Provisioning & Installation Overview

Questionnaire - Amendment

Questionnaire - New Customer

Regulatory Commissions

Service Intervals

Single Location Routing Number

Tariff Locations

Technical Publications

Telecommunications Associations

Unauthorized Service Provider Change

USOC/FID Finder

SEARCH GO ABOUT QWEST CAREERS AT QWEST

Deaverged Rate Zones by Wire Center Oregon
Wholesale Geographic Deaveraging

# Deaveraged Rate Zone by Wire Center
# Oregon

The following table shows the Geographic Deaveraged Zones by Wire Center:

| Wire Center (CLLI code) | STATE | ZONE |
|---|---|---|
| ALBYOR63 | OR | Zone 1 |
| ASLDOR55 | OR | Zone 1 |
| ASTROR64 | OR | Zone 1 |
| BAKROR23 | OR | Zone 1 |
| BENDOR24 | OR | Zone 1 |
| CNPNOR29 | OR | Zone 1 |
| CRVSOR65 | OR | Zone 1 |
| DLLSOR58 | OR | Zone 1 |
| EUGNOR28 | OR | Zone 1 |
| EUGNOR53 | OR | Zone 1 |
| FLRNOR53 | OR | Zone 1 |
| GRPSOR29 | OR | Zone 1 |
| HMTNOR56 | OR | Zone 1 |
| INDPOR58 | OR | Zone 1 |
| KLFLOR54 | OR | Zone 1 |
| LKOSOR62 | OR | Zone 1 |
| MDFDOR33 | OR | Zone 1 |
| MLWKOR17 | OR | Zone 1 |
| NWPTOR35 | OR | Zone 1 |
| ORCYOR18 | OR | Zone 1 |
| PHNXOR55 | OR | Zone 1 |
| PNTNOR56 | OR | Zone 1 |
| PTLDOR02 | OR | Zone 1 |
| PTLDOR08 | OR | Zone 1 |
| PTLDOR11 | OR | Zone 1 |
| PTLDOR12 | OR | Zone 1 |
| PTLDOR13 | OR | Zone 1 |
| PTLDOR14 | OR | Zone 1 |
| PTLDOR17 | OR | Zone 1 |
| PTLDOR18 | OR | Zone 1 |
| PTLDOR69 | OR | Zone 1 |
| PTLDOR69 | OR | Zone 1 |
| PTLDOR69 | OR | Zone 1 |
| RDMDOR01 | OR | Zone 1 |
| RSBGOR57 | OR | Zone 1 |
| SALMOR58 | OR | Zone 1 |
| SALMOR59 | OR | Zone 1 |
| SESDOR64 | OR | Zone 1 |
| SPFDOR01 | OR | Zone 1 |
| SPFDOR01 | OR | Zone 1 |
| STHNOR40 | OR | Zone 1 |
| WDBNOR59 | OR | Zone 1 |
| WRTNOR64 | OR | Zone 1 |
| ADARORR21 | OR | Zone 2 |
| BURLOR62 | OR | Zone 2 |
| CLVROR01 | OR | Zone 2 |
| CNBHOR64 | OR | Zone 2 |
| CTGVOR53 | OR | Zone 2 |
| FLCYOR58 | OR | Zone 2 |
| GLHLOR55 | OR | Zone 2 |
| JCVLOR56 | OR | Zone 2 |
| JFSNOR63 | OR | Zone 2 |
| JNCYOR51 | OR | Zone 2 |
| LAPIOR52 | OR | Zone 2 |
| LWLLOR53 | OR | Zone 2 |
| MDRSOR52 | OR | Zone 2 |
| MLTNOR56 | OR | Zone 2 |
| NPLNOR62 | OR | Zone 2 |
| PRVLOR53 | OR | Zone 2 |
| RANROR01 | OR | Zone 2 |
| RGRVOR55 | OR | Zone 2 |
| SPRVOR02 | OR | Zone 2 |
| SSTROR01 | OR | Zone 2 |
| STFDOR56 | OR | Zone 2 |
| STHROR58 | OR | Zone 2 |

| Wire Center (CLLI code) | STATE | ZONE |
|---|---|---|
| TOLDOR66 | OR | Zone 2 |
| UMTLOR57 | OR | Zone 2 |
| VENTOR54 | OR | Zone 2 |
| WNTNOR57 | OR | Zone 2 |
| ATHNOR56 | OR | Zone 3 |
| BLBTOR01 | OR | Zone 3 |
| BLRVOR53 | OR | Zone 3 |
| CLCKOR53 | OR | Zone 3 |
| LEBGOR54 | OR | Zone 3 |
| MPTNOR54 | OR | Zone 3 |
| MRCLOR53 | OR | Zone 3 |
| OKRGOR01 | OR | Zone 3 |
| SLTZOR66 | OR | Zone 3 |
| WRSPOR52 | OR | Zone 3 |

CMP

- CMP Home
- CMP Document
- Team Meetings
  - Archive
- Change Requests (CRs)
  - Archive
- CMP Redesign
  - Archive
- Document Review
  - Product/Process Archive & Responses
  - System Archive & Responses
- CMP Oversight Committee
- Escalations/Disputes
  - Initiation
  - Ongoing Escalations
  - Archive
- OSS Hours of Availability
- CMP Points Of Contact (POCs)
- Customer Notification Letter Archive
- CMP Calendars
- OSS Interface Releases
- Team Meetings
- Other System Links

# Archived System CR SCR051403-2X Detail

**Title: Adding Zone information to Bills**

| CR Number | Current Status Date | Level of Effort | Interface/ Release No. | Area Impacted | Products Impacted |
|---|---|---|---|---|---|
| **SCR051403-2X** | Withdrawn 9/19/2003 | - | / | Billing | UNE, Unbundled Loop, 2-Wire Non-loaded Loop, ISDN Compatible Loop, 2-Wire Digital Loop, UNE-P |

**Originator:** Berard, John

**Originator Company Name:** Covad

**Owner:** Winston, Connie

**Director:** Winston, Connie

**CR PM:** Esquibel-Reed, Peggy

## Description Of Change

Revised Request

Currently Qwest does not reflect the Zone information on the Bill. USOC rates vary by Zone. Knowing the Zone is needed in order to reconcile our bills. In addition, Covad requests that all one-time charges on our bill include USOC's.

Original Request

Currently Qwest does not reflect the Zone information on the Bill. USOC rates vary by Zone. Knowing the Zone is needed in order to reconcile our bills.

Expected Deliverables:

As soon as possible.

CMP

- CMP Home
- CMP Document
- Team Meetings
  - Archive
- Change Requests (CRs)
  - Archive
- CMP Redesign
  - Archive
- Document Review
  - Product/Process Archive & Responses
  - System Archive & Responses
- CMP Oversight Committee
- Escalations/Disputes
  - Initiation
  - Ongoing Escalations
  - Archive
- OSS Hours of Availability
- CMP Points Of Contact (POCs)
- Customer Notification Letter Archive
- CMP Calendars
- OSS Interface Releases
- Team Meetings
- Other System Links

## Status History

| Date | Action | Description |
|---|---|---|

## Project Meetings

9-19-03 John Berard agreed to withdraw this CR as SCR061703-03IG has an implementation date of 06-2004.

-- September 11, 2003 Email Sent to John Berard/Covad: John, Per our discussion today SCR061703-03IG encompasses the portion of the USOC work that would be required by your request. Your CR PC051403-2 Adding zone information to Bills, can be withdrawn. I will ask Cindy Macy the CRPM for this CR to place your request in pending withdrawal to be discussed at the September 17th meeting. I understand that your questions regarding zone information were resolved through discussions with Qwest SME's If you have questions or comments give me a call. Kit Thomte 303 896-6776

September 18, 2003 Product/Process Meeting Minutes: Terri Kilker-Qwest advised we have worked with Covad to review the additional products and determined those products are not zone billed so zone information would not be shown on the bills. The outstanding problem on this CR regarding non-recurring USOC charges in Western and Eschelon's CR opened in August of 2000 was reviewed. It was determined that systems CR SCR061703-03IG will take care of this problem. John would like to know the implementation date of the SCR061703-03IG. John didn't want to combine this request with the other request if it would increase the delivery timeframe.

-- Ad Hoc Meeting Minutes PC051403-2 Adding Zone information to Bills CMP Product & Process July 25, 2003 1-877-572-8687, Conference ID 3393947# 10:00 a.m. - 10:30 a.m. Mountain Time

PURPOSE

At the July CMP Meeting, participants agreed to hold a conference call and include CLEC technical experts for a discussion about products beyond UNE-P CLECs desire rate zone and USOC information. The following is the write-up of the discussions, action items, and decisions made in the working session.

List of Attendees: Mike Olser - Covad Candy Davis - Covad John Berard - Covad Lori Mendoza - Allegiance Liz Balvin - MCI Stephanie Prull - McLeod USA Terri Kilker Qwest Crystal Soderlund - Qwest Carl Sear - Qwest

MEETING MINUTES

The meeting began with Qwest making introductions and welcoming all attendees.

Linda Sanchez-Steinke with Qwest provided brief history of the change request and said that Qwest arranged this meeting to discuss what products CLECs desire rate zone and USOC information in their bill. John Berard with Covad said that Covad had found when performing bill reconciliation they are not getting all zone information they need to receive. Candy Davis with Covad said that some states, Colorado, Minnesota, and Oregon are missing the zone on the spreadsheet provided. Carl said that he had investigated the rate zone examples and determined they were Line Sharing examples. Crystal Soderlund with Qwest said that Line Sharing is billed at a flat rate and not rate zoned. There are missing USOCs for non-recurring charges in the western region. Carl is investigating the missing USOCs.

To clear up confusion about why some accounts have USOCs and some don't, Crystal explained that BANs for unbundled loop and line sharing were sometimes combined due to the initial implementation timeframes required for the product. As Qwest finds these BANs they are separated and currently the products are billing on separate BANs.

Candy asked if it would be accurate to say they can get USOC and zone information on electronic as well as paper bills. Carl said yes USOC and rate zone information is provided in both formats and that line sharing is not billed by rate zone but is a flat rated charge. Carl asked if Covad gets EDI or ASCII. Candy answered they receive BOS BDT. Carl will ask the BOS BDT SME if USOCs appear on those bills.

Terri asked that Covad provide examples where they are not getting rate zone and USOC information on other UNE products beside line sharing and Qwest will investigate.

Qwest asked if there were any additional comments. No comments were made.

CMp Meeting 07-16-03

Kilker-Qwest presented the response. She stated that Qwest needed more information from Covad because the product list in the CR description did not include many of the products in the example file Covad provided. Berard-Covad stated that he would send White a comprehensive list of all products Covad wanted this change to apply to. White-Qwest stated that there was an Ad Hoc Meeting scheduled for 7/24 to discuss this change.

========== CMP Meeting 06-18-03

Berard-Covad presented the CR.
==========
Clarification Meeting Tuesday, May 27, 2003

1-877-550-8686 2213337#

Attendees Matt White - Qwest Terri Kilker - Qwest John Berard - Covad Mike Osler - Covad

Introduction of Attendees White-Qwest welcomed all attendees and reviewed the request.

Review Requested (Description of) Change Berard-Covad reviewed the CR. Kilker-Qwest asked if this is specific to any particular service. Berard-Covad stated that it would be for UNE Loops and Line Share Loops. Kilker-Qwest asked if Covad was associating line sharing with the loops or UNE-P. Berard-Covad stated that is was for both. He asked if this was a defect or just not a current service. Osler-Covad stated that Covad receives the information for some states but not others. He stated that he had some examples pulled together. Kilker-Qwest stated that she'd like to see the examples.

Confirm Areas and Products Impacted White-Qwest confirmed that the attendees were comfortable that the request appropriately identified all areas and products impacted.

Confirm Right Personnel Involved White-Qwest confirmed with the attendees that the appropriate Qwest personnel were involved.

Identify/Confirm CLEC's Expectation White-Qwest reviewed the request to confirm Covad's expectation.

Identify and Dependant Systems Change Requests White-Qwest asked the attendees if they knew of any related change requests.

Establish Action Plan White-Qwest asked attendees if there were any further questions. There were none. White-Qwest stated that the next step was for Covad to present the CR at the June Monthly Product/Process Meeting and thanked all attendees for attending the meeting.

## QWEST Response

August 13, 2003

DRAFT RESPONSE For Review by CLEC Community and Discussion at the August 20, 2003 CMP Meeting

John Berard, Covad

SUBJECT: Qwest's Change Request Response - CR # PC051403-2 (Adding Zone Information to Bills)

Qwest amends its earlier acceptance of this change request to now include Unbundled Loop products in addition to UNE-P, based on an Ad-Hoc meeting held on July 25, 2003 with Covad and other interested CLECs.

To briefly recap the events of the meeting, Covad provided a list of additional products for which they were requesting zone and USOC billing detail, in along with the UNE-P products in their original request. The additional products identified were Unbundled Loop (2-Wire Non-Loaded Loop, ISDN Compatible Loop, 2-Wire Digital Loop, ISDN Basic Rate Loop, 2-Wire ADSL) and Shared Loop (Line Sharing.)

In addition to the request for zone and USOC billing detail on the Unbundled Loop and Shared Loop products, Covad clarified that they believe they are currently missing zone or USOC information on some of their Unbundled Loop billing.

Qwest informed Covad and the other CLECs in attendance that Shared Loop (Line Sharing) is not billed based on zones, therefore, zone information cannot be provided. The CLEC representatives in attendance expressed their understanding with Qwest's position on this issue.

After the meeting concluded, Qwest reviewed additional examples of Unbundled Loop bills that Covad maintained were missing zone or USOC information. As a result of this investigation, Qwest did uncover a condition restricted to the Western region where the English description and rate for any nonrecurring USOC appears on the bill, but the USOC does not appear. Trouble ticket number 197112 has been issued on the condition, and as of this date is pending investigation.

Sincerely,

Terri Kilker Process Specialist Qwest

==========
July 9, 2003

REVISED RESPONSE For Review by CLEC Community and Discussion at the July 16, 2003, CMP Product/Process Meeting

SUBJECT: Qwest's Change Request Response – CR # PC051403-2 (Adding Zone Information to Bills)

This is in response to Covad's Change Request CR PC051403-2. This change request asks that zone information be reflected on Qwest billing so that Covad can reconcile its bills. Additionally, Covad requests that Qwest include USOCs for one-time charges on its bills.

Qwest has reviewed examples provided by COVAD and finds that for UNE-P products (which may or may not include line splitting), Qwest is currently providing the zone and USOC information; therefore, Qwest accepts this change request for UNE-P.

As a result of its investigation of the examples provided by Covad, Qwest now believes that Covad may have intended this change request to encompass more than UNE-P products. If Covad confirms that it intended for its change request to extend beyond UNE-P products, Qwest recommends that the change request be moved into evaluation status. Qwest would further recommend that Covad revise its change request to provide a precise list of products for which it desires zone and USOC information, and an ad-hoc meeting be scheduled where all appropriate

subject matter experts at Covad and Qwest can review Covad's requirements.

Sincerely,

Terri Kilker Process Specialist Qwest

<Back

**Information Current as of 3/7/2005**

**CERTIFICATE OF SERVICE**

**ARB 584**

I hereby certify that on the 23rd day of March, 2005, I served the foregoing **QWEST CORPORATION'S REBUTTAL TESTIMONY OF WILLIAM EASTON, KAREN STEWART, RENÉE ALBERSHEIM and MICHAEL NORMAN** in the above entitled docket on the following persons via U.S. Mail, by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at their regular office address shown below, and deposited in the U.S. post office at Portland, Oregon.

| | | |
|---|---|---|
| *Lisa F. Rackner<br>Ater Wynne LLP<br>222 SW Columbia St.<br>Suite 1800<br>Portland, OR 97201-6618 | *Greg Diamond<br>Covad Communications Co<br>7901 Lowry Blvd.<br>Denver, CO 80230 | *Winslow B. Waxter<br>Qwest Corporation<br>1005 17th St. - Suite 200<br>Denver, CO 80209 |

DATED this 23rd day of March, 2005.

**QWEST CORPORATION**

By: _____

ALEX M. DUARTE, OSB No. 02045
421 SW Oak Street, Suite 810
Portland, OR 97204
Telephone: 503-242-5623
Facsimile: 503-242-8589
e-mail: alex.duarte@qwest.com
Attorney for Qwest Corporation