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IDAHO PUBLIC
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF IPUC RESPONSE TO FCC
ORDER ON REVIEW OF SECTION 251
UNBUNDLING OBLIGATIONS OF INCUMBENT
LOCAL EXCHANGE CARRIERS (CC DOCKET
NO. 01-338)**

Case. No. GNR-T-03-23

**JOINT MOTION FOR ADOPTION OF
BATCH HOT CUT FORUM**

**NINE-MONTH REVIEW OF ECONOMIC AND
OPERATIONAL IMPAIRMENT REGARDING
ACCESS TO SPECIFIC UNES**

Qwest Corporation (“Qwest”), AT&T of the Mountain States, Inc. (“AT&T”), and WorldCom, Inc., on behalf of its regulated subsidiaries (“MCI”) (the “Parties”) jointly propose the following process and framework for addressing the batch hot cut requirements of the FCC’s Triennial Review Order (“Order”):

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Overview:

The Parties agree that a single, uniform batch hot cut process for all states within the Qwest region provides the most efficient and effective operating environment for both Qwest and CLECs. The Parties also agree that it is appropriate for the industry participants (ILECs and CLECs) to the extent possible, to attempt to reach agreement on a batch hot cut process prior to submitting a process to Commissions for review and approval. Toward that end, the Parties propose a multi-state forum with participation by both industry (ILECs and CLECs) as well as state commission personnel and other interested persons. The Parties further agree it is essential for state commissions to endorse this process. To the extent all of the states do not agree to endorse the process, the Parties reserve the right to withdraw this proposal and proceed on a state-by-state basis.

Industry participation

The Parties agree that the forum should be structured and conducted in a manner that encourages participation by as many CLECs as possible. The Parties propose to hold the first face-to-face meeting in Denver, Colorado with the option for participants to participate via a conference bridge in the event they are unable to travel to Denver. Should the forum participants determine that additional face-to-face meetings are required, the Parties propose that subsequent meetings be held in Seattle, Washington, and Phoenix, Arizona, to minimize the travel burdens that may be experienced by any one CLEC. Participation by conference bridge will also be available for any subsequent meetings.

All discussions conducted in the forum will be transcribed by a licensed court reporter and be made a part of the record in any state's 9-month proceeding. Qwest will assume the administrative role of creating the agenda for, and documenting the results of, each meeting. All

agreements reached by participants during the forum will be documented and will be binding upon the parties that entered into such agreements. Impasse issues concerning the batch hot cut process remaining at the conclusion of the forum process will also be documented and will be litigated before the State Commissions for resolution during the 9-month proceedings in each of the states. CLECs and other participants will have an opportunity to comment on, and/or revise, written materials indicating agreement, disagreement or other with the content of Qwest's documentation of the issues.

All proposals and materials to be discussed at the forum will be provided to participants electronically two (2) business days in advance of any face-to-face meetings or conference calls. In addition, the proposals, transcripts of prior meetings, and any other applicable materials will be posted on the Qwest website at: www.qwest.com/wholesale/guides/index.html.

Timelines

Given the rigorous timelines set forth by the FCC in its Order for the state proceedings regarding a batch hot cut process, the Parties propose the following schedule for the forum and the subsequent incorporation of the results of the forum into the 9-month proceedings in each state:

ACTIVITY	DUE DATE
Commission Notice to all CLECs within respective states regarding batch hot cut forum	November 5, 2003
Qwest submits its batch hot cut proposal which will include a detailed description of the process, including, but not limited to, capacity, Pre-order, Ordering and Provisioning, the proposed cost for the batch hot cut activities, and the intervals.	November 11, 2003
CLECs submit comments/counter proposals to Qwest's batch hot cut proposal	November 18, 2003
Initial Forum – Denver, Colorado	December 1-3, 2003

Weekly conference calls on batch hot cut proposal, if useful. Face-to-face meetings as necessary (in Seattle, Washington & Phoenix, Arizona)	December 4, 2003 - January 15, 2004
Simultaneous filing of direct testimony on impasse issues regarding the batch hot cut process and filing of a Stipulation among parties on areas of agreement/consensus items.	January 20, 2004
Simultaneous filing of rebuttal testimony	February 15, 2004
Hearings & Commission Decision	Per each state's procedural order in the 9-month dockets

Notice

The Parties propose each state commission issue a Notice to all CLECs within its respective state advising that it endorses the multi-state forum, adopts the schedule and procedural requirements described above, and strongly encourages interested parties to actively participate in the multi-state forum. The parties further request that such notice be issued by November 5, 2003, to all CLECs and other interested parties.

In the interest of making this filing on an expedited basis, the undersigned is authorized to state that AT&T and MCI concur in this proposal and is further authorized to sign and file this pleading on behalf of AT&T and MCI.

Respectfully submitted this 31st day of October, 2003.

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CERTIFICATE OF SERVICE

I hereby certify that on this ____ day of October, 2003, I served the foregoing **JOINT MOTION FOR ADOPTION OF BATCH HOT CUT FORUM** follows:

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