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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

**QWEST CORPORATION'S BATCH HOT
CUT PROPOSAL**

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

Pursuant to Order No. 29375, Qwest Corporation (“Qwest”) respectfully submits this proposal for a region-wide batch loop conversion process. Qwest proposes a single, centrally coordinated ordering and conversion process that would be used in all fourteen of its states whenever a CLEC has the requisite number of qualified lines to convert from Qwest’s circuit switch (both Qwest retail and CLEC UNE-P lines) to the CLEC’s circuit switch. The same process could also be used to convert lines from one CLEC’s circuit

switch. The same process could also be used to convert lines from one CLEC's circuit switch to another's to the extent that sufficient volumes existed to justify use of the batch process.

Qwest's proposal builds on, and makes improvements to, a process for provisioning unbundled loops that already operate at a demonstrably high level of performance. As discussed below, Qwest's current process does not suffer from many of the cost and operational problems that the *Triennial Review Order*¹ identified; Qwest does not have problems with excessive provisioning delays or service outages;² and, Qwest does not levy huge non-recurring charges to perform a hot cut.³ Moreover, unlike some other incumbent LECs,⁴ Qwest actually does have substantial experience migrating large batches of CLEC lines — including thousands in 2003 for one CLEC alone — from UNE-P to stand-alone unbundled loops on a project-managed basis. These batch conversions *are* reflected in Qwest's current performance data, and establish that Qwest has continued to provide these loops to the CLEC at an extraordinarily high level of quality.

Even with this strong performance, in the two and a half months since the *Triennial Review Order's* release, Qwest has worked hard to improve this process even further. Qwest has re-examined every step of its current loop-conversion process to find

¹ Report and Order, *Review of the Section 251 Unbundling Obligation of Incumbent Local Exchange Carriers*, CC Dkt. No. 01-338, FCC 03-36 (rel. Aug. 21, 2003) ("*Triennial Review Order*" or "*TRO*").

² Compare *TRO* ¶ 466 with *infra* at section I(B) (discussion of Qwest provisioning and outage data).

³ Compare *TRO* ¶ 470 with *infra* at section II(D) (discussion of Qwest's current NRCs).

⁴ See *TRO* ¶ 474 & n.1466 (finding that Verizon's procedures for performing project-managed migrations "not sufficiently developed" and noting Verizon's failure to provide any performance data reflecting these project-managed cuts).

the efficiencies that become available when a CLEC works with Qwest to convert twenty-five lines or more in a single batch. Qwest has also used its experience performing large-scale project-managed conversions to identify the steps that can be streamlined or eliminated when the carriers are migrating batches of in-service loops. Qwest's work has paid off: The batch conversion process that Qwest proposes reduces substantially the work times associated with some of the steps within the process, the number of times Qwest has to contact the CLEC, and the process of clearing the order once the work has been completed. While Qwest has not yet completed its detailed cost studies, it appears that in virtually every instance these efficiencies will reduce Qwest's cost of performing a batch hot cut.

Qwest first provides a brief background summarizing the FCC's instructions to the state commissions concerning adoption of a new batch conversion process, as well as the loop-conversion process that Qwest is currently using. Qwest then presents its proposal for a new batch process.

I. BACKGROUND

A. The Triennial Review Order and the FCC's Implementing Rules.

In the *Triennial Review Order*, the FCC determined that "in the large majority of locations" (though not all),⁵ the incumbent LECs' existing processes for migrating in-service loops one at a time from their own switches to their competitors' would "serve as barriers to competitive entry in the absence of unbundled switching" for mass-market customers.⁶ The FCC found that the incumbents' current one-at-a-time conversions, as a general matter, imposed non-trivial one-time costs and service

⁵ TRO ¶ 473.

⁶ TRO ¶ 460.

disruption risks on CLECs, and it questioned whether these processes would be able “to handle the necessary volume of migrations” if mass-market switching is taken off the unbundling list.⁷ The FCC did note that some incumbents had begun to perform larger numbers of loop migrations on a project-managed basis, and that “[t]he record evidence strongly suggests” that managing and performing cut-overs on a batch basis in this manner could yield significant improvements. But based on the specific record before it, the FCC concluded that these project-managed processes were not yet “sufficiently developed or widespread enough to adequately address the impairment created by the loop cut over process.”⁸

The FCC acknowledged that the evidence before it was “not sufficiently detailed” to permit it to evaluate whether these general observations held true for any carrier’s particular hot cut process in any individual market,⁹ and that states might well find in some markets that “existing hot cut practices would be adequate even in the absence of unbundled local circuit switching.”¹⁰ But for all other markets, the FCC directed the states to “approve, within nine months of the effective date of this Order, a batch cut migration process . . . that will address the costs and timeliness of the hot cut process.”¹¹ The FCC’s formal rules implementing the *Triennial Review Order* define a “batch cut process” as “a process by which the incumbent LEC simultaneously migrates two or more loops from one carrier’s local circuit switch to another carrier’s local circuit

⁷ TRO ¶ 459.

⁸ TRO ¶ 474.

⁹ TRO ¶ 473.

¹⁰ TRO ¶ 490.

¹¹ TRO ¶ 488.

switch, giving rise to operational and economic efficiencies not available when migrating loops . . . on a line-by-line basis.”¹² The FCC held that the efficiencies that become available when migrating loops in batches rather than singly would mitigate the economic and operational burdens on which the FCC’s presumptive national finding of impairment for mass-market switching was based: “We conclude that the loop access barriers contained in the record may be mitigated through the creation of a batch cut process by spreading loop migration costs over a large number of lines, decreasing per-line cut over costs.”¹³

The FCC rules implementing the *Order* direct state commissions to make four determinations with respect to the new batch conversion process (beyond determining whether any new process is required in a given market at all¹⁴):

- (1) A state commission shall first determine the appropriate volume of loops that should be included in the “batch.”
- (2) A state commission shall adopt specific processes to be employed when performing a batch cut, taking into account the incumbent LEC’s particular network design and cut over practices.
- (3) A state commission shall evaluate whether the incumbent LEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the incumbent LEC for any requesting telecommunications carrier in a timely manner, and may require that incumbent LECs comply with an average completion interval metric for provision of high volumes of loops.

¹² 47 C.F.R. § 51.319(d)(2)(ii).

¹³ *TRO* ¶ 487.

¹⁴ 47 C.F.R. § 51.319(d)(2)(B) provides, “If a state commission concludes that the absence of a batch cut migration process is not impairing requesting telecommunications carriers’ ability to serve end users using DS0 loops in the mass market without access to local circuit switching on an unbundled basis, that conclusion will render the creation of such a process unnecessary.” The rule specifies the findings that a state must make if it chooses not to require adoption of a new batch process. *See also TRO* ¶ 490.

(4) A state commission shall adopt rates for the batch cut activities it approves in accordance with the Commission's pricing rules for unbundled network elements. These rates shall reflect the efficiencies associated with batched migration of loops to a requesting telecommunications carrier's switch, either through a reduced per-line rate or through volume discounts as appropriate.¹⁵

The paragraphs of the *Order* giving state commissions specific instructions for the nine-month cases contain these same directives.¹⁶

B. Qwest's Current Hot Cut Process.

As just noted, in considering any new batch conversion process, a state commission must "tak[e] into account the incumbent LEC's particular network design and cut over practices."¹⁷ Qwest has already spent considerable time and effort to develop a seamless process for provisioning large quantities of unbundled loops for CLECs at an extremely high level of quality, and to develop TELRIC-compliant rates for that process. The state commissions and the FCC examined Qwest's existing hot cut process at length in the section 271 proceedings and found it adequate. Rather than redescribing the entire process in this document, Qwest attaches the affidavit of William M. Campbell, filed before the FCC in the recent Arizona section 271 docket, which outlines Qwest's current hot cut process. *See Exhibit 1.* To highlight:

- Qwest uses, and must continue to use, the same hot cut process in all fourteen of its states.
- Qwest has a dedicated center in Omaha, Nebraska – the QCCC – that oversees the provision of each and every hot cut throughout the Qwest region.

¹⁵ 47 C.F.R. § 51.319(d)(ii)(A)(1)-(4).

¹⁶ *See TRO* ¶ 489.

¹⁷ 47 C.F.R. § 51.319(d)(ii)(A)(2).

- Qwest has a detailed procedure that defines the hot cut process. **See Exhibit 2.**
- Qwest has trained its technicians on the hot cut process.
- Qwest has provisioned unbundled loops for CLECs using this process at an extremely high level of quality. Qwest's audited and reconciled performance data shows that it is routinely provisioning over 98% of its hot cut commitments across the region on time. **See Exhibit 3.** This percentage varies in individual states, but in general remains within the 95-98% performance level. **See Exhibit 4.** Moreover, only a small fraction of migrated loops experience any trouble in the 30 days following cut-over. Regionally, for example 97.5%-99.99% of loops do not experience installation troubles. **See Exhibits 3-4.**

Qwest uses its current process to provision approximately 1,000 hot cuts per day on average, and has processed up to 1,350 hot cuts in a single day. Importantly, these numbers reflect CLECs' actual order levels, not the maximum number of hot cuts Qwest could perform in a single day.

Qwest has experience working with CLECs to transition very large batches of UNE-P lines to stand-alone unbundled loops simultaneously. Qwest has already worked with one CLEC to migrate thousands of UNE-P lines to the CLEC's own switching using its current form of "batch processing." These numbers continue to mount. Unlike some other LECs whom the FCC specifically considered in the *Triennial Review Order*,¹⁸ Qwest includes the results of this large-scale batch conversion process in its performance data. Thus, the extremely good performance results noted above reflect Qwest's ability to perform hot cuts for its CLEC customers in larger quantities. *See Exhibits 3-4.* The batch conversion process that Qwest proposes in this forum reflects

¹⁸ The FCC noted that Verizon's project-managed large-batch hot cuts were not offered at set rates, were not subject to any performance intervals, and, as a result, were not tracked by Verizon's performance metrics. *See TRO* ¶ 474 & n.1466.

Qwest's actual experience with these types of large-scale cuts and the lessons it has learned regarding what does and does not work.

II. QWEST'S BATCH LOOP CONVERSION PROPOSAL

Qwest presents its proposal for a new batch hot-cut process in terms of the four determinations the FCC instructed state commissions to make.

A. The Minimum "Batch" That Qualifies for the Batch Conversion Process (47 C.F.R. § 51.319(d)(ii)(A)(1)).

As noted above, the very point of adopting a *batch* hot cut process is to capture the operational and economic efficiencies that come from migrating many in-service loops simultaneously rather than singly. The FCC directed the states to consider batch conversions specifically because it "expect[ed] these processes to result in efficiencies associated with performing tasks once for multiple lines that would otherwise have been performed on a line-by-line basis,"¹⁹ and it is the ability to "spread loop migration costs over a large number of lines, decreasing per-line cut over costs" that enables "the loop access barriers contained in the record [to] be mitigated."²⁰ But these per-loop costs drop only if the CLEC converting a high enough quantity of loops to give rise to economies and justify the slightly greater up-front coordination that batch conversions require. The CLEC must also be seeking to convert loops of a kind that actually permit conversion tasks to be consolidated; otherwise, there are no efficiencies to pass through.

For these reasons, the first task the FCC assigned the states was to determine what minimum "batch" of loops a CLEC must be converting in order to

¹⁹ TRO ¶ 489.

²⁰ TRO ¶ 487.

qualify for “batch” conversion. *See* 47 C.F.R. § 51.319(d)(ii)(A)(1); *TRO* ¶ 489. (This is a separate question from the maximum volumes of loops the batch conversion process must be prepared to handle, which is discussed in part C below). Qwest’s preliminary determination is that the necessary economies and efficiencies may be realized when a CLEC is converting twenty-five (25) voice grade lines at a single time in a single central office. The reason why CLECs need at least twenty-five (25) lines *individually* is that some of the significant efficiencies — for example the ability to reduce the number of separate calls between Qwest and the CLEC, and the ability to perform multiple pre-wirings in the same physical locations on the frame — come from performing multiple conversions *for the same CLEC*, not just from doing multiple conversions *per se*.²¹

In addition, batched loops must all be capable of conversion on a consolidated basis. The FCC adopted its batch conversion requirement to assist CLECs in serving the “mass market,” which the FCC defined as “consumers of analog ‘plain old telephone service’ or ‘POTS’ that purchase only a limited number of POTS lines and can only economically be served via analog DS0 loops.”²² A batch conversion process is possible for these analog DS0 loops, which constitute the vast majority of Qwest’s outside plant. But it is not feasible to gain these efficiencies when the underlying facility uses integrated digital loop carrier systems (“IDLC”). The *Triennial Review Order* itself recognizes²³ that IDLC is not unbundled via the same, uniform cut-over process as other loop plant: Each IDLC loop must be examined individually to determine which of the

²¹ *Cf.* *TRO* ¶ 489 (FCC expects efficiencies to come from consolidating pre-wiring and reducing number of communications between ILEC and CLEC).

²² *TRO* ¶ 459.

²³ *See TRO* ¶ 297 (noting that unbundling IDLC loops “may require incumbent LECs to implement policies, practices, and procedures different from those used” to unbundle other kinds of loops); *id.* n.855 (describing a number of different ways that IDLC loops might be unbundled).

several unbundling methods used for such loops (such as finding a metallic pair alternative, hair-pinning, reconnecting the loop to a universal DLC system at the remote terminal, or installing a new central-office terminal) is available or appropriate for that loop. Qwest emphasizes that it will continue to unbundle IDLC lines a very high level of quality; however, such loops (which form the small percentage of Qwest's plant in any event) must be migrated individually using the existing hot cut process.²⁴ See *Exhibit 5*.

Likewise, the FCC expressly defined its batch-cut requirements in terms of developing a process to migrate loops "from one carrier's local circuit switch to another carrier's *local circuit switch*."²⁵ The FCC's definition of a "batch cut process" thus does not include conversions including loop-splitting arrangements that also connect an unbundled loop to a third carrier's *packet switch*. As the Arizona Corporation Commission has properly recognized,²⁶ the FCC directed carriers to pursue line-splitting implementation, not as part of the nine-month switching cases or the development of a batch conversion process, but rather as part of the pre-existing change management process.²⁷ The FCC's decision *not* to include loop splits as part of the batch conversion process makes sense: conversions from UNE-P directly to loop-splitting arrangements

²⁴ See TRO ¶¶ 251-252

²⁵ 47 C.F.R. § 51.319(d)(ii) (defining "batch cut process") (emphasis added). See also 47 C.F.R. § 51.319(d)(ii)(A) (directing state commissions to establish process "for use in migrating lines served by one carrier's local circuit switch to lines served by another carrier's *local circuit switch*") (emphasis added).

²⁶ See Arizona Corporation Commission, Procedural Order, *ILEC Unbundling Obligations As a Result of the Federal Triennial Review Order*, Dkt. No. T-00000A-03-0369 (Nov. 6, 2003) at 5-6 ("[T]he FCC's Triennial Review Order did not require line splitting to be addressed in the nine-month docket and . . . no party could point to another state commission that is addressing line splitting in its triennial review proceedings."); *id.* at 7 ("IT IS FURTHER ORDERED that line splitting will not be addressed in this docket.").

²⁷ See TRO ¶ 252 ("[W]e encourage incumbent LECs and competitors to use existing state commission collaboratives and change management processes to address OSS modifications that are necessary to support line splitting.").

cannot be consolidated into a batch because each loop must be individually checked to ensure it is capable of carrying DSL signals and, if not, conditioned. Just as contemplated by the *Triennial Review Order*, the voice CLEC in a potential line-splitting arrangement will be able to use Qwest's *current* processes to migrate individual lines to stand-alone unbundled loops connected to that CLEC's circuit switch.²⁸

B. The Process Employed (47 C.F.R. § 51.319(d)(2)(ii)(A)(2)).

The FCC's second instruction to the states is to "adopt specific processes to be employed when performing a batch cut, taking into account the incumbent LEC's particular network design and cut over practices."²⁹ Compared to the loop conversion process that Qwest uses today, the new batch hot cut process eliminates many of the repetitive dial tone testing steps, much of the telephonic contact between the two companies, and the need for duplicative entries into Qwest systems in order to update records. The new process also has new business rules associated with it on both Qwest's and the CLEC's part. Each is intended to make the work steps within the new process more efficient and workable for both parties.

1. Process flow.

Exhibit 6 is a process diagram describing the recommended tasks for the new batch hot cut process. As illustrated in this diagram, a CLEC will perform pre-order functions including an initial batch coordination meeting with Qwest. CLEC must submit to Qwest a Local Service Request ("LSR") with a Purchase Order Number ("PON") and a three-letter unique identifier *e.g.*, ("BHC") to designate it as a batch hot cut candidate in order to begin the batch conversion. Once a complete and accurate LSR

²⁸ TRO ¶¶ 251-252.

²⁹ 47 C.F.R. § 51.319(d)(2)(ii)(A)(2). *See also* TRO ¶ 489.

is received, a service order will be generated resulting in a firm order confirmation ('FOC') back to the CLEC. Once the service order is issued, a Qwest project manager, residing in the QCCC, will begin compiling the batch orders on a Central Office ("CO") by CO basis.

Approximately two days prior to due date for the batch, a spreadsheet containing all loops in the batch will be forwarded to both the CLEC and the central office where the work will take place. This batch spreadsheet will contain order related information such as the CLEC Purchase Order Number ("PON") with a three-letter unique identifier ("BHC") describing it as a batch hot cut candidate; the Qwest order number; a Qwest project ID number; and CLEC contact information.

On the due date, the Central Office Technician ("COT") will perform both the pre-wiring and lift and lay activity associated with the conversion order. Prior to performing the lift and lay, however, the COT will perform a dial tone test on both the Qwest switch port and the CLECs facility to verify the existence of dial tone on each facility, and that each facility has the correct number working on it. These tasks will occur before any conversion is conducted. If the COT does not have dial tone on the CLEC's facility on the due date, the QCCC will contact the CLEC via a phone call asking the CLEC to resolve the issue. If CLEC dial tone is present, the COT will monitor the line to ensure an idle state prior to disconnecting the Qwest circuit switch and then reconnecting it to the CLEC's switch. Upon completion of the orders identified on the batch spreadsheet, Qwest will notify the CLEC via email that it has completed the conversions. It remains the responsibility of the CLEC to ensure that each line is triggered for number porting upon completion of the order.

2. Batch Hot Cut Requirements.

Exhibit 7 contains a list of the draft requirements that both Qwest and the CLECs must follow in order to make the conversion process as seamless and efficient as possible. A summary of the most significant of these requirements is as follows:

a. General requirements

The batch hot cut process is applicable to basic installations that will re-use existing facilities; this will avoid the need to dispatch a Qwest technician to the field to change outside plant facilities. Other installation options will remain available during normal business hours to provision other types of unbundled loops. For example, UNE-P loops working on Integrated Digital Loop Carrier systems, or line splitting arrangements will be converted during normal business hours using existing processes because a field dispatch may be required to complete the conversion.

b. Qwest-specific requirements

Qwest will produce and distribute via e-mail a batch spreadsheet for the CLEC documenting all order activity within a given central office, and use this batch spreadsheet to communicate with the CLEC on order status and completion. Unlike the QCCC's current process, to maximize efficiency Qwest will conduct pre-wire work on the due date, not two days earlier, to minimize the number of instances technicians must work on each order.

c. CLEC-specific requirements

The CLEC must provide both email and live contact information on the LSR when it is submitted. The CLEC must provide accurate end-user service address information. The CLEC dial tone must be on their designated CFA

termination prior to the due date. The CLEC must make resources readily available to clear all loops identified on the batch spreadsheet in a timely manner between the hours of 3:00PM CST and 11:00PM CST. This will ensure that the CLEC and Qwest can promptly resolve any issues the COT may encounter (*i.e.*, bad CFA or no dial tone).

C. The Capacity and Timeliness of the Batch Process (47 C.F.R. § 51.319(d)(2)(ii)(A)(3)).

The FCC's third instruction to state commissions is to "evaluate whether the incumbent LEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the incumbent LEC for any requesting telecommunications carrier in a timely manner"³⁰ This requires state commissions to make predictive judgments regarding the volumes of conversions the batch cut process must be able to handle and whether Qwest can continue to provision loops at an acceptable level of quality at those volumes.

The expected volume of conversions turns on five factors: (1) current volumes of stand-alone unbundled loop provisioning, (2) current volumes of new UNE-P orders, (3) the size of the embedded UNE-P base, (4) the fraction of that base and new UNE-P orders that will convert to stand-alone unbundled loops, and (5) the *Triennial Review Order's* schedule for transitioning the embedded UNE-P base to other arrangements. Qwest addresses each factor in turn. The volumes of UNE-P and UNE-L lines CLECs submit monthly are well established in Qwest's performance data. The only unknown is the percentage of UNE-P lines (new and existing) that will convert once switching is no longer available as a UNE.

³⁰ 47 C.F.R. § 51.319(d)(2)(ii)(A)(3). *See also* TRO ¶ 489.

The FCC set a transition schedule for moving the embedded base of UNE-P lines to unbundled loops. CLECs must submit 1/3 of their embedded UNE-P lines for conversion 13 months after the state commission decision; 1/3 of their UNE-P lines 20 months after the state commission decision; and the last 1/3 of their UNE-P lines 27 months after the state commission decision.³¹ Assuming a July 2, 2004 decision from the state commission, that means 1/3 of the embedded base will convert between August 2005 and February 2006; 1/3 of the embedded base will convert between March 2006 and September 2006, and the remainder will convert before April 2007.³² The FCC also stated that state commission decisions eliminating unbundled switching as a UNE will become effective on December 2, 2004.³³

Thus, to calculate the expected monthly volumes in each state, the state commissions should apply the following formulas based on the volumes of UNE-P lines and UNE-L lines in each individual state:

- December 2004 – July 2005: [Inward unbundled loop volume (growth) eligible for the batch hot cut process * percent of UNE-P lines in markets where Qwest is challenging the impairment finding]
- August 2005 – April 2007: [Inward unbundled loop volume (growth) eligible for the batch hot cut process * percent of UNE-P lines in markets where Qwest is challenging the impairment finding] + [Embedded UNE-P base amortized over 21 months * percent of UNE-P lines in markets where Qwest is challenging the impairment finding]

These formulas will provide the expected volumes of unbundled loops that Qwest's must be prepared to provision in each state on a monthly basis.

³¹ 47 C.F.R. §51.319(d)(4)(A).

³² *TRO* ¶ 532.

³³ 47 C.F.R. §51.319(d)(4).

D. Batch Cut Rates (47 C.F.R. § 51.319(d)(2)(ii)(A)(4)).

The FCC's last directive to each state commission is to "adopt rates for the batch cut activities it approves in accordance with the Commission's pricing rules for unbundled network elements," which should "reflect the efficiencies associated with batched migration" ³⁴ The final rate will obviously depend on the precise procedure adopted in this forum.

As an initial matter, Qwest notes it is starting from a better position than many other incumbent LECs in this regard. The FCC found in the *Triennial Review Order* that currently hot cuts are "often priced at rates that prohibit facilities based competition for the mass market,"³⁵ citing ILEC non-recurring charges exceeding \$100 and as high as \$185.³⁶ But Qwest's hot cut charges across its region are not nearly this high. In virtually every state Qwest's current non-recurring charges for a basic hot cut range between \$29.10 and \$65.00.³⁷

The batch conversion process that Qwest proposes above will yield significant additional efficiencies and in most states the CLEC community can expect to experience a significantly reduced rate.

III. CONCLUSION

Qwest hereby presents a viable batch hot cut proposal that will allow CLECs to convert large volumes of DS0 lines to unbundled analog loops, while still ensuring that

³⁴ 47 C.F.R. § 51.319(d)(2)(ii)(A)(4). See also TRO ¶ 489.

³⁵ TRO ¶ 465 (emphasis added).

³⁶ TRO ¶ 470.

³⁷ In two states, Idaho and Minnesota, the nonrecurring rates associated with hot cuts are substantially below this range. In these states, these costs are well below the cost of providing the service even with the new batch hot cut process. As such, it does not set forth these rates as an example.

CLEC end-user customers have minimal service interruption, and minimal installation service problems. In most states, the process will also significantly reduce the non-recurring rate associated with provisioning an individual unbundled loop. Qwest has already demonstrated that the CLEC community can use its existing hot cut process to reach mass-market customers at a high level of quality. This simplified process should do nothing but improve an already strong process. Qwest asks the Idaho Public Utilities Commission to approve its proposed process.

Respectfully submitted this 12th day of November, 2003.

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of November, 2003, I served **QWEST CORPORATION'S BATCH HOT CUT PROPOSAL** as follows:

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Qwest Communications)	WC Docket No. _____
International Inc.)	
)	
Consolidated Application for Authority)	
to Provide In-Region, InterLATA Services)	
in Arizona)	

DECLARATION OF WILLIAM M. CAMPBELL

**Checklist Item 4 of Section 271(c)(2)(B):
Unbundled Loops**

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DECLARATION OF WILLIAM M. CAMPBELL

**Checklist Item 4 of Section 271(c)(2)(B):
Unbundled Loops**

Pursuant to 47 C.F.R. § 1.16, William M. Campbell declares as follows:

1. My name is William M. Campbell. My business address is 1801 California Street, Denver, Colorado. I am Director, Product Marketing – Interconnection Services, at Qwest Corporation (“Qwest”). ^{1/} I am the Product Director responsible for Checklist Item 4 – Unbundled Loops. In that position, I have directed the Qwest Unbundled Loop Product Team developing products and processes for the Qwest Unbundled Loop products and have the responsibility to represent Qwest in formal Section 271 proceedings. As part of Qwest’s work to ensure its compliance with Section 271, I have participated extensively in the state

^{1/} A description of my professional experience and education is attached as Exhibit WMC-LOOP-1 to this Declaration.

proceedings in Arizona, Colorado, Nebraska, Oregon, Washington, and the Multi-state 271 workshops involving Idaho, Iowa, Montana, New Mexico, North Dakota, Utah, and Wyoming. This includes directing testimony in South Dakota and Minnesota.

I. EXECUTIVE SUMMARY

2. Qwest satisfies the requirements of Section 271(c)(2)(B)(iv) of the Telecommunications Act of 1996 (“1996 Act” or “Act”) and Federal Communications Commission (“Commission” or “FCC”) rules that relate to the provision of unbundled loops. Consistent with the Act and Commission precedent,^{2/} Qwest has a concrete and specific legal obligation to provide competitors with nondiscriminatory access to unbundled loops under both its

^{2/} See *New York 271 Order*, 15 FCC Rcd at 3962-63 (¶ 20) (“[T]he Commission must consult with the relevant state commission to verify that the BOC has one or more state approved interconnection agreements with a facilities-based competitor, or a statement of generally available terms and conditions (“SGAT”), and that either the agreement(s) or general statement satisfy the ‘competitive checklist.’”); see also *Texas 271 Order*, 15 FCC Rcd at 18360-61 (¶ 11) (illustrating use of an SGAT, rather than individually negotiated interconnection agreements, to test compliance with the checklist requirements). Once an SGAT has gone into effect pursuant to Section 252(f)(3)(B), every CLEC is entitled to adopt any of the services or terms of the agreement pursuant to Section 252(i). The Commission has held that the “pick and choose” rule of Section 252(i) applies to SGATs. See 14 FCC Rcd at 20984-85 (¶ 167).

Statement of Generally Available Terms and Conditions (“SGAT”)^{3/} and state-approved interconnection agreements.^{4/}

3. Qwest’s unbundled loop offerings comply with Commission requirements.^{5/} Qwest makes available to CLECs all required types of unbundled loops, including analog/voice grade loops, digital subscriber line (“xDSL”) loops, and high-capacity loops. Qwest performs hot cuts for CLECs and, where technically feasible, provides CLECs with access to unbundled loops provisioned over integrated digital loop carrier (“IDLC”) technology. Qwest performs loop conditioning where necessary to allow CLECs to provide digital services. Qwest also provides CLECs with nondiscriminatory access to pre-order loop makeup

^{3/} Qwest’s Arizona SGAT is located at Attachment 5, Appendix B of this Application.

^{4/} Appendix L contains state-approved interconnection agreements that Qwest has entered into with CLECs in Arizona as of August 1, 2003. The Arizona SGAT has been converted to a state-approved interconnection agreement (“SGAT-Based Interconnection Agreement”) as the result of New Edge Networks’ opt-in to the June 28, 2002, Arizona SGAT. Qwest relies on this agreement and the other interconnection agreements filed with the Arizona Commission, in addition to its SGAT, to establish checklist compliance. Unless otherwise noted, references to SGAT language and section numbers also are intended to refer to SGAT-Based Interconnection Agreements.

^{5/} Qwest recognizes that in its Triennial UNE Review proceeding, the Commission modified its requirements with respect to unbundled loops. In the wake of the Commission’s decision, Qwest will continue to ensure that its unbundled loop policies and practices are consistent with applicable federal law.

information.^{6/} Finally, Qwest makes available to CLECs unbundled access to dark fiber loops, to subloops, and to the high-frequency portion of the loop.^{7/}

4. As of May 31, 2003, Qwest had in service 37,719 unbundled loops in Arizona. (These figures represent stand-alone loops only, not those provided as part of a UNE combination.) Specifically, Qwest had in service 30,253 unbundled voice-grade analog loops, 5,578 xDSL-capable loops, and 1,888 high-capacity loops. The volume of unbundled loops in service demonstrates that Qwest is provisioning loops to CLECs in Arizona in a nondiscriminatory fashion.^{8/}

II. QWEST HAS COMPLIED WITH THE COMMISSION'S UNBUNDLED LOOP REQUIREMENTS

5. Section 271(c)(2)(B)(iv) of the 1996 Act requires Bell Operating Companies ("BOCs") wishing to offer in-region interLATA service to provide "local loop transmission from the central office to the customer's premises, unbundled

^{6/} Qwest's loop qualification tools, policies, and practices are discussed in the Declaration of Lynn M V Notarianni and Loretta A. Huff on Operations Support Systems ("OSS").

^{7/} These products are discussed in separate Declarations of Karen A. Stewart on, respectively, Dark Fiber, Network Interface Devices and Subloops, and Line Sharing and Line Splitting.

^{8/} Exhibit WMC-LOOP-2 shows the growth in the number of loops in service in Arizona. Qwest's commercial performance for unbundled loops is described in the Commercial Performance Declaration of Dean Buhler.

from local switching or other services.”^{9/} In the *UNE Remand Order*, the

Commission defined the local loop as:

[A] transmission facility between a distribution frame (or its equivalent) in the incumbent LEC central office and the loop demarcation point at an end-user customer premises, including inside wire owned by the incumbent LEC. The local loop network element includes . . . dark fiber, attached electronics (except those electronics used for the provision of advanced services, such as Digital Subscriber Line Access Multiplexers), and line conditioning.^{10/}

6. Qwest complies with the unbundled loop requirements of the 1996 Act and the Commission’s rules and orders. Qwest has a concrete and specific legal obligation to provide CLECs with access to unbundled loops under its SGAT and state-approved interconnection agreements. Moreover, Qwest provides unbundled loops to CLECs in a nondiscriminatory manner.

7. The loop provisions in Qwest’s SGAT have evolved not only on a state-by-state basis, but across Qwest’s region through workshops and hearings that were part of collaborative processes, conducted on an open basis with active participation by CLECs. Throughout these processes, Qwest attempted to reach consensus with CLECs on SGAT language. When that was not possible, the

^{9/} 47 U.S.C. § 271(c)(2)(b)(IV).

^{10/} *UNE Remand Order*, 15 FCC Rcd at 3772-78 (¶¶ 166-79); *see also* 47 C.F.R. § 51.319(a)(1).

“impasse” issue went to the state regulatory authority for resolution. As a result, Qwest’s SGAT reflects a great deal of CLEC input.

8. In addition to the SGAT, Qwest further defines the specifications, interfaces, and parameters associated with unbundled loops in Technical Reference Publication Nos. 77384 (unbundled loops), 77375 (DS1), 77324 (DS3), and 77346 (OCn), all of which are available on Qwest’s web site.^{11/} Qwest’s Wholesale Product Catalog (“PCAT”), also available on Qwest’s web site, provides CLECs with additional product information.^{12/}

A. Qwest Offers All Required Categories of Unbundled Loops and Related Services

9. Qwest offers CLECs the complete range of unbundled loops. Specifically, Qwest offers (1) 2-wire and 4-wire voice-grade/analog loops; (2) four types of loops that generally can be grouped together in the category of “xDSL capable” loops; and (3) four types of high-capacity loops.^{13/}

1. Voice-Grade/Analog Loops

10. *Basic 2-Wire/4-Wire Analog Loop.* The basic 2-wire/4-wire analog loop is available as a 2-wire or 4-wire voice grade, point-to-point configuration suitable for local exchange type services. This service is a

^{11/} Technical publications can be found at <http://www.qwest.com/wholesale/notices/techPub.html>.

^{12/} The PCAT can be found at <http://www.qwest.com/wholesale/pcat/index.html>.

^{13/} See SGAT §§ 9.2.2.2-9.2.2.3, 9.2.6.1.

transmission path that provides a connection from the Qwest serving central office distribution frame or equivalent to the demarcation point at the end user's location. The actual loop facilities may utilize various technologies or combinations of technologies.^{14/}

2. xDSL-Capable Loops

11. Qwest offers four types of loops that can be classified as "xDSL capable" loops: (1) 2-wire and 4-wire "non-loaded" loops, (2) asymmetrical digital subscriber line ("ADSL") compatible loops, (3) Basic Rate ISDN ("BRI") capable loops, and (4) xDSL-I capable loops.

12. *2-Wire/4-Wire Non-Loaded Loop.* The 2-wire/4-wire non-loaded loop is a metallic facility that provides a transmission path from the Qwest serving central office distribution frame, or equivalent, to the end user's demarcation point. It is a metallic, wire cable pair with no load coils, and, depending on the Network Channel ("NC") and Network Channel Interface ("NCI") codes specified by the CLEC, with, potentially, some limited lengths of bridged tap. Qwest will condition loops at the CLEC's request. The loop conditioning process is described in detail below.

13. *ADSL Compatible Loop.* The ADSL compatible loop is an unbundled 2-wire non-loaded metallic facility that establishes a transmission path between a Qwest serving central office distribution frame and the demarcation

^{14/} SGAT § 9.2.2.2.

point located at the end user's designated premises. This loop will meet the ADSL performance requirements specified in Qwest's Technical Publication No. 77384. If necessary, Qwest will condition the loop at the CLEC's request to meet ADSL technical parameters.

14. *Basic Rate ISDN ("BRI") Capable Loop.* The Basic Rate ISDN capable loop is a Qwest facility with a 2-wire interface that provides a transmission path from the Qwest serving central office distribution frame, or equivalent, to an end user's demarcation point. This loop transports bi-directional, 2-wire signals with a nominal transmission rate of 160 KBPS, meets the performance requirements specified in Qwest's Technical Publication No. 77384, and permits access to 144 KBPS channelized payload bandwidth for transport of services.

15. *xDSL-I Capable Loop.* The xDSL-I capable loop is a 2-wire facility that provides a transmission path from the Qwest serving central office distribution frame, or equivalent, to an end user demarcation point. This loop transports bi-directional, 2-wire signals with a standard transmission rate of 160 KBPS, meets the performance requirements specified in standard technical publications, and permits access to a nominal 144 KBPS unchannelized payload bandwidth for transport of services.

16. Qwest uses the terms "capable" and "compatible" to make it clear that while Qwest provides the loops themselves, CLECs provide the service over those loops. Specifically, "capable" means that Qwest assures that the loop

provisioned complies with industry technical standards. ^{15/} The term “compatible” means that Qwest assures that the loop complies with the ordered NC/NCI codes, but makes no assumptions as to the capabilities of the CLEC’s central office equipment or customer premises equipment (“CPE”). ^{16/} Qwest does not restrict the CLEC’s use of the loop except as expressly permitted or required by existing rules. ^{17/}

17. *Extension Technology.* Qwest provides extension technology, if needed, for Basic Rate ISDN (“BRI”) capable loops and xDSL-I capable loops. ^{18/} Extension technology takes into account, for example, additional regenerator placement, central office powering, and mid-span repeaters, if required, as well as BRITE cards in order to provision the Basic Rate ISDN capable or xDSL-I capable loop. Extension technology may be required to bring the circuit to the technical specifications necessary to accommodate the requested service. Qwest will add extension technology if the circuit design requires it or if requested by a CLEC to meet its specific needs. If the circuit design requires extension technology to meet

^{15/} SGAT § 9.2.2.1.1. For example, ANSI Standards T1.601 and T1.102 specify the ISDN and DS1 interfaces. There are test sets that indicate whether the loop is performing to the established standards. Qwest will build the capable loop using whatever equipment it takes, such as subscriber loop carrier or range extenders, to ensure that the loop meets the standards.

^{16/} SGAT § 9.2.2.1.2.

^{17/} SGAT § 9.1.5.

^{18/} SGAT § 9.2.2.5.

the technical standards, then Qwest will add it at no charge.^{19/} However, if a CLEC requests the addition of extension technology even though the loop conforms to the technical standards, then the inclusion of extension technology will result in a monthly recurring charge to the CLEC.

3. High-Capacity Loops

18. Qwest offers four types of high-capacity loops under the SGAT: (1) DS1-capable loops, (2) DS3-capable loops, (3) OCn loops, and (4) dark fiber loops.^{20/}

19. *DS1-Capable Loops.* The DS1-capable loop is a transmission path between the Qwest serving central office distribution frame, or equivalent, and the demarcation point at the end user location. The DS1-capable loop transports bi-directional DS1 signals with a nominal transmission rate of 1.544 Mbps and meets the design requirements specified in standard industry technical publications.^{21/}

20. *DS3-Capable Loops.* The DS3-capable loop is a transmission path between a Qwest serving central office distribution frame, or equivalent, and a demarcation point at an end user location. The DS3-capable loop transports bi-

^{19/} *Id.*

^{20/} SGAT § 9.2.1.

^{21/} SGAT § 9.2.2.6.1.

directional DS3 signals with a nominal transmission rate of 44.736 Mbps that meets the design requirements specified in standard industry technical publications. ^{22/}

21. For DS1- or DS3-capable loops, Qwest will provide the necessary electronics at both ends, including any intermediate repeaters. In addition, the CLEC will have access to these terminations for testing purposes. ^{23/} Additionally, Qwest permits CLECs to add multiplexing to both DS1 and DS3-capable loops. ^{24/}

22. *OCn Capable Loops.* Qwest also stands ready to provide access to higher capacity loops, including OC3, OC12, OC48, and OC192 loops, where facilities are available. ^{25/}

23. *Dark Fiber Loops.* Qwest's dark fiber offerings are in section 9.7 of the SGAT and are discussed in the Dark Fiber Declaration of Karen A. Stewart.

B. Qwest Complies With the Commission's Spectrum Management Rules

24. Spectrum management is the administration of loop plant to facilitate spectrum compatibility for services and technologies that use pairs in the same cable. Spectrum compatibility, in general, refers to the ability of loop

^{22/} SGAT § 9.2.2.6.2.

^{23/} SGAT § 9.2.2.6.

^{24/} SGAT § 9.2.2.10.

^{25/} SGAT § 9.2.2.3.1.

technology to operate and reside in the same or an adjacent binder group without causing an unacceptable degradation of service from the end user's perspective. ^{26/}

25. In the Arizona proceedings, Qwest's spectrum management policies generated an impasse issue. Qwest modified its Arizona SGAT to reflect the outcome of this issue in the ACC's final order on loops. ^{27/} Qwest's spectrum policies therefore comply with the ACC's final order on loops. Qwest is also in compliance with current federal requirements for spectrum management. As the Commission continues to develop its spectrum management policies, Qwest will revise its spectrum policies as necessary to remain consistent with them.

C. Qwest Policies and Procedures with Respect to Unbundled Loops Demonstrate Qwest's Compliance with Checklist Item 4

26. The following sections describe the steps through which a CLEC obtains unbundled loops from Qwest, including ordering, provisioning, and maintenance and repair. Qwest has well-developed processes in place for provisioning, maintaining, and repairing unbundled loops for CLECs.

1. Ordering Process

27. *The Local Service Request Form.* CLECs order unbundled loops by completing a local service request ("LSR") and submitting it over one of Qwest's

^{26/} *Line Sharing Order*, 14 FCC Rcd at 20988-89 (¶178).

^{27/} *ACC Loops Final Order*, ¶¶ 73-86.

electronic or manual interfaces.^{28/} For each unbundled loop ordered, CLECs must specify the loop type (including the NC/NCI codes), provide the Connecting Facility Assignment (which identifies where the loop should be wired in the central office), specify the desired installation option, and note the desired due date.

28. *Desired Due Dates and Standard Installation Intervals.* CLECs may calculate a due date based on the minimum number of days provided in the SGAT as Qwest's standard installation interval for the specified loop type. A CLEC may also specify a later date (*i.e.*, allow a longer installation interval than the standard interval). The following chart is a summary of Qwest's loop installation intervals in Arizona^{29/}:

^{28/} SGAT §§ 9.2.4.1, 9.2.4.4.

^{29/} Qwest's loop installation intervals are consistent with the ACC's final order. *ACC Loops Final Order*, ¶¶ 27-34.

Loop Type		1-8 loops	9-16 loops	17-24 loops	25+ loops
Analog/Voice Grade Loops	Standard Analog Loops	5 days	6 days	7 days	ICB
	Quick Loop Analog-Conversion ^{30/}	3 days	3 days	3 days	ICB
xDSL-Capable Loops	No Conditioning Required	5 days	6 days	7 days	ICB
	Conditioning Required	15 days	ICB	ICB	ICB
High-Capacity Loops	DS1-Capable	5 days	7 days	9 days	ICB
	DS3-Capable	7 days (1-3 loops)	ICB (4-16 loops)	ICB	ICB
	Fiber/OCn/Other High-Capacity	ICB	ICB	ICB	ICB

29. During the state proceedings, Qwest made a number of CLEC-friendly modifications to the loop installation intervals. For instance, Qwest reduced the interval for xDSL-I loops from 10 days to align with the intervals of 5, 6, and 7 days for xDSL- and ISDN-capable loops. Qwest also created a shorter installation interval for analog loop conversions, called Quick Loop. Quick Loop offers a three-day installation interval for conversion of existing service to a 2-wire analog loop ordered with the basic installation option. ^{31/} Since October 22, 2001,

^{30/} Qwest provides a 3-day installation option, called Quick Loop, for conversion of in-place analog loops that do not require coordinated installation or cooperative testing. Quick Loop is not available for loops served over IDLC technology. As discussed herein, Quick Loop is also offered for loops with number portability. The installation intervals for Quick Loop with LNP are 3 days for 1 to 24 loops and ICB for 25 or more loops.

^{31/} All Quick Loop performance results are reflected in the analog loop performance indicators.

this option has also been available for analog loops with number portability. Few CLECs have utilized the Quick Loop option to date. CLECs do not need a contract amendment to utilize these shortened intervals.

30. *Process for Requesting Loop Conditioning.* Loop conditioning (or line conditioning) is the term used to describe the process of removing load coils and excess bridged tap from existing copper loops that would negatively affect the transmission of a digital signal. In many cases, the data portion of the loop is diminished if there are load coils or certain amounts of bridged tap on the loop. To allow CLECs full use of the loop's capability, Qwest provides CLECs with loop conditioning for xDSL-capable services upon request, consistent with Commission rules.^{32/} The ability to condition loops is not, however, unlimited. The conditioning requirement is subject to a technical feasibility standard the Commission has delineated.^{33/}

31. Although the Commission does not require that Qwest condition loops proactively, in 2000 Qwest voluntarily established a bulk de-loading project to remove load coils from copper loops that are under 18,000 feet in length in selected wire centers and routes in which CLECs and Qwest were providing DSL services.

^{32/} See 47 C.F.R. § 51.319(a)(3)(i) & (h)(5) (ILECs must "remov[e] from the loop . . . any device that may diminish the capability of the loop to deliver high-speed switched wireline telecommunications capability, including xDSL service"); see also SGAT §§ 9.2.2.4 and 9.2.4.9.

^{33/} *Local Competition First Report and Order*, 11 FCC Rcd at 15691-92 (¶ 381).

The CLECs assisted Qwest in prioritizing the project schedule for this work. The de-loading project reduced the occurrence of short copper loops that needed to be conditioned on a one-by-one basis. Qwest provided the CLECs with a web-based tool that identified the wire centers and routes included in the project as well as an expected completion date. Once Qwest de-loaded a route and updated the databases, the route was posted on the web as a completed route. Two hundred ninety-eight wire centers were included in this project regionwide.^{34/}

32. The bulk de-loading project was completed in March 2001 at no cost to the CLECs. As the individual jobs were completed, the conditioned pair status was updated in the loop qualification databases, increasing the available inventory of digital-capable loops. This inventory is available, as with all loops, on a first-come, first-served basis.

33. Qwest's loop qualification tools provide CLECs with information to determine whether loop conditioning will be required.^{35/} When submitting an unbundled loop order, CLECs may indicate that they approve loop conditioning, where needed, by entering a "Y" (for yes) in the space provided for "special

^{34/} Qwest initiated a second bulk de-loading program in 2002. Thus Qwest continues to take voluntary steps to minimize the need for line-at-a-time conditioning.

^{35/} These tools are described in the pre-order section of the OSS Declaration of Lynn M V Notarianni and Loretta A. Huff.

construction authorization” on the LSR form.^{36/} This entry on the LSR provides Qwest with approval to complete any required conditioning. If the LSR form contains the indicator for loop conditioning but conditioning is not required, then the due date can be consistent with the installation interval based on loop type and the number of non-conditioned loops ordered, as described above.^{37/}

34. If the CLEC fails to indicate on the LSR form that loop conditioning is approved, but Qwest determines that conditioning is required, then Qwest will inform the CLEC of the need for conditioning. The CLEC then has a four-hour window to provide positive authorization via a supplement to the LSR. If the CLEC does not respond within four hours, Qwest cancels the order.

35. *Firm Order Confirmation.* Qwest will provide the CLECs with confirmation of the receipt of their LSR and indicate the due date for the service installation via a Firm Order Confirmation (“FOC”). One of Qwest’s performance measures, PO-5, monitors the timeliness with which Qwest returns FOCs to CLECs in response to LSRs. PO-5 requires Qwest to provide the CLEC with a FOC for unbundled analog loops within 24 hours of receiving a valid and complete LSR. For

^{36/} SGAT § 9.2.2.4.

^{37/} SGAT § 9.2.4.9.1.

xDSL- and DS1-capable loops, the PIDs require Qwest to return the FOC within 72 hours.^{38/}

2. Provisioning Process

36. *Facility Assignment.* Although Qwest recommends that CLECs pre-qualify loops prior to placing an order, pre-qualification is not mandatory. Once a valid service order has been received by Qwest, all retail and wholesale orders follow the same facility assignment process.^{39/} The mechanized assignment process searches for compatible facilities and will assign the first compatible facilities that can support the requested loop type. If compatible facilities are not available for DS0-level facilities, Qwest uses a standard 11-step facility assignment process to try to identify compatible facilities. This process includes, but is not limited to, looking for a line and station transfer (“LST”) or recovering defective pairs. The 11-step facility assignment process is presented in Exhibit WMC-LOOP-6.

37. *Provisioning Process.* When Qwest provisions an unbundled loop, a central office technician must be dispatched to run jumpers connecting the unbundled loop to the CLEC’s connecting facility assignment (“CFA”) as specified on the LSR by the CLEC. Additionally, a field technician may need to be

^{38/} As a result of a trial conducted during the Colorado workshops, Qwest and CLECs agreed to support revising the FOC interval in the PO-5 PID for xDSL and DS1 loops from 24 to 72 hours. The ROC TAG approved that modification, and Qwest notified CLECs of the change through the Change Management Process. Qwest’s performance under PO-5 is discussed in the Commercial Performance Declaration of Dean Buhler.

dispatched to perform cross connect work at the feeder distribution interface (“FDI”), pedestal, or network interface device (“NID”). Exhibits WMC-LOOP-7 and WMC-LOOP-8 delineate the tasks Qwest personnel perform to install an unbundled loop.

38. *Installation of Loops Provisioned with IDLC Technology.* The Commission requires Qwest to unbundle loops that are provisioned over integrated digital loop carrier (“IDLC”) technology. However, the Commission acknowledged in the *UNE Remand Order* that unbundling loops provisioned over IDLC is difficult and may even be impossible in some circumstances.^{40/} Qwest is committed to providing CLECs access to unbundled loops, even when IDLC technology is deployed, whenever technically feasible.^{41/} Qwest has continuously provided loops on this type of facility since early 1999, long before Qwest offered an IDSL solution to Qwest’s retail end users in April 2000. Throughout 2000 and 2001, Qwest worked through the difficulties inherent with the provisioning of loops for DSL generally, and loops provisioned with IDLC specifically. IDLC technology was the subject of discussion in state 271 workshops, and numerous CLEC meetings focused on identifying provisioning alternatives. Qwest worked cooperatively with CLECs to clear loop orders that were held due to IDLC provisioning issues by identifying

^{39/} SGAT § 9.1.2.1.1.

^{40/} *UNE Remand Order*, 15 FCC Rcd at 3788-89 (¶ 204, n.390).

^{41/} SGAT § 9.2.2.2.1.

viable engineering solutions. Further, Qwest established a specialized team within the Qwest CLEC Coordination Center (which is described in paragraph 48 of this Declaration) to focus specifically on supporting CLEC unbundled loop orders over IDLC. Qwest developed and utilizes an engineering decision tree, depicted in Exhibit WMC-LOOP-5, to determine the best method to provision unbundled analog, ISDN, and xDSL-I loops served by IDLC.

39. To assist the CLEC considering future market opportunities, Qwest provides access to its ICONN database.^{42/} The ICONN database, available on Qwest's external website, provides information at a wire center level. Information includes number of total lines available, lines in service, and lines served by universal or integrated DLC.

40. Qwest also makes available wire center makeup information in the Wire Center Raw Loop Data Flat File.^{43/} This flat file is comma delimited and downloadable to an Excel type spreadsheet that allows the CLEC to manipulate and analyze the data. CLECs may also use Qwest's electronic interfaces, IMA-GUI and IMA-EDI, to obtain individual loop makeup information.^{44/}

^{42/} The ICONN database is located at <http://www.qwest.com/iconn>.

^{43/} CLECs must obtain a digital certificate in order to use this tool. Qwest's OSS web site, <http://www.qwest.com/wholesale/systems>, includes instructions for obtaining a digital certificate and for using the Wire Center Raw Loop Data Flat File.

^{44/} These tools are described in the OSS Declaration of Lynn M V Notarianni and Loretta A. Huff.

41. *Process for Conditioning Loops.* Qwest provides for loop conditioning to ensure that CLECs can obtain a copper loop without load coils and excessive bridged tap. Conditioning requires an engineering job to be issued and a construction technician is dispatched to the field to cut away from the load coil cable stub and re-splice the loop together. For efficiency, CLECs may request both line conditioning and installation on the same LSR.

42. Two loop conditioning issues reached impasse in the Arizona Section 271 proceedings. The first involved a question of whether Qwest must reimburse a CLEC for conditioning costs if the CLEC loses the customer within a certain period of time, as the CLECs presumed that such a loss would be due to Qwest's actions. The ACC ordered a change to SGAT section 9.2.2.4.1, providing for a credit of conditioning charges if Qwest does not meet a due date for line conditioning or does not perform conditioning in accordance with the standards applicable under the SGAT.^{45/}

43. The second loop conditioning issue involved a question of whether Qwest may charge CLECs for conditioning lines of less than 18,000 feet in length. The ACC affirmed that the *UNE Remand Order* permitted such charges and required no change to the SGAT language on this issue.^{46/}

^{45/} *ACC Loops Final Order*, ¶¶ 70-72.

^{46/} *Id.*, ¶¶ 66-67.

44. *Installation Options.* Qwest's SGAT offers CLECs five installation options, all of which are available for both the conversion of existing customer lines to unbundled loops and the installation of new unbundled loops.^{47/} These options are: (1) basic installation; (2) basic installation with performance testing; (3) basic installation with cooperative testing; (4) coordinated installation; and (5) coordinated installation with cooperative testing. In addition, Qwest offers an enhancement to the standard installation options called project coordinated installation, which is available for high-volume orders and other special orders.^{48/} Regardless of the installation option chosen, Qwest notifies the CLEC when the installation work is complete. Qwest also coordinates the activities associated with installation of unbundled loops and number portability, as depicted in Exhibit WMC-LOOP-4. Qwest's installation options are described in further detail below.

45. *Basic Installation Options.* CLECs may select from among three options for basic (*i.e.*, non-coordinated) installation. First, the Qwest central office technician and field technician execute basic performance tests and perform the installation.^{49/} If a CLEC selects basic installation with performance testing, Qwest technicians conduct performance tests and provide the results to the CLEC

^{47/} SGAT §§ 9.2.2.9.1 - 9.2.2.9.5.

^{48/} SGAT § 9.2.2.9.7.

^{49/} SGAT § 9.2.2.9.1.2.

after the tests are concluded. ^{50/} Qwest has implemented a process to e-mail the test results to CLECs within two business days so that CLECs have a written record of the tests Qwest performs. ^{51/} For the basic installation with cooperative testing option, after the Qwest technicians conduct their performance tests, they contact the CLEC with the results, and the CLEC performs its own loop back acceptance test. The CLEC then accepts the loop, and the parties exchange demarcation information. ^{52/} If Qwest fails to perform cooperative testing due to Qwest's fault, Qwest will waive the non-recurring charge for the installation option. ^{53/}

46. *Coordinated Installation Options.* Coordinated installation and testing are often needed by the CLEC in order to have a seamless installation for the end-user customer. The coordinated installation options allow the CLEC to designate a specific appointment time on the date when Qwest will begin the installation of an unbundled loop. The CLEC may request installation outside the standard business hours of 8:00 a.m. to 5:00 p.m. on business days, but additional charges apply. CLECs most often request a coordinated installation to coordinate work between Qwest and the CLEC when the service is associated with an existing

^{50/} SGAT §§ 9.2.2.9.2.1-9.2.2.9.1.3.

^{51/} SGAT § 9.2.2.9.3.2.

^{52/} SGAT § 9.2.2.9.5.1.

^{53/} SGAT § 9.2.2.9.5.3.

working line, although coordinated installation is also available for new customer lines.^{54/} Coordinated installation enables the CLEC and its customer to plan ahead for minimal service interruption.

47. Qwest has established a control center, the Qwest CLEC Coordination Center ("QCCC"), to coordinate all loop installations. Qwest created the QCCC to improve the level of service on hot cuts. After observing the best practices of other ILECs and customizing for Qwest use, Qwest invited the CLEC community to review and suggest modifications to the QCCC's business processes.^{55/} The QCCC continues to improve performance through focused operational analysis, continued CLEC feedback, and proposed Change Request ("CR") activity.^{56/} Approximately 100 Qwest employees work at the center, all having completed unique and focused training. After the establishment of the

^{54/} Exhibit WMC-LOOP-7 is the process flow for coordinated installation of new loops, which includes a description of the tasks performed for these types of installations. Exhibit WMC-LOOP-8 is the process flow for the coordinated installation of an existing customer, commonly called a "hot cut." Page two of the Exhibit defines the tasks, and page three is a sample of the data collected by Qwest implementers to track the coordinated installation.

^{55/} Qwest invited the CLEC community to a forum dedicated to reviewing the new hot cut procedures in the QCCC. The May 2001 session was a constructive two-way dialogue modifying and clarifying the resulting processes for the QCCC operation.

^{56/} CR# 5548229 is an example of a CLEC-submitted CR. This CR, accepted and implemented by Qwest, allows CLECs to verbally change Connecting Facility Assignment ("CFA") on an order to resolve CLECs' CFA assignment issues without renegotiating a new due date. CR# 5548229 can be found on Qwest's web site, at <http://www.qwest.com/cmp/changerequest.html>.

QCCC in March 2001, Qwest's performance for providing coordinated installations improved significantly, as Exhibit WMC-LOOP-10 shows. In April 2002, the QCCC assumed all control responsibility for installing unbundled loops.

48. On the order due date at the appointment time specified by the CLEC, a QCCC coordinator coordinates activities between the CLEC and Qwest. A call is placed to the CLEC to determine if the CLEC is ready for the service to be transferred. If the CLEC is ready, Qwest central office and field work is performed. If the CLEC indicates that it is not ready, Qwest will wait up to 30 minutes from the appointment time. If the CLEC is still not ready, then a new appointment (date and time) is scheduled. If Qwest misses the appointment time by 30 minutes or fails to perform cooperative testing, due to Qwest's fault, Qwest will waive the non-recurring installation charge. If Qwest fails to perform testing, Qwest will reschedule the test at no charge to the CLEC if the CLEC still wishes to perform cooperative testing.^{57/}

49. The first coordinated installation option is coordinated installation without cooperative testing. On the due date, at the CLEC-designated appointment time, the QCCC coordinator contacts the CLEC to ensure that they are ready for the installation. The Qwest technicians complete the installation and

^{57/} SGAT §§ 9.2.2.9.3, 9.2.2.9.4.

work with the Qwest implementor/tester to complete the required performance tests. The CLEC is verbally advised that the installation is complete. ^{58/}

50. The second option is coordinated installation with cooperative testing. This option permits the CLEC to request an appointment time as well as joint testing with Qwest. When a CLEC requests a coordinated installation with cooperative testing, Qwest will perform testing with the CLEC to ensure connectivity between a CLEC's collocated equipment and its network demarcation point. ^{59/} Cooperative testing is performed after the Qwest installation and testing. The cooperative test is requested by the CLEC, and Qwest will assist in these tests at the CLEC direction. As with basic installation with cooperative testing, Qwest provides CLECs with an option to receive the Qwest test results via e-mail.

51. Qwest also offers project coordinated installation. This highly synchronized form of coordinated installation permits the CLEC to obtain a coordinated installation for unbundled loops with or without number portability where the CLEC orders unbundled DS1-capable loops, DS3-capable loops, or 25 or more DS0 unbundled loops. Because of the increased collaboration between Qwest and the CLEC with a project coordinated installation, Qwest and the CLEC must negotiate the date and time for the installation in advance. Project coordinated

^{58/} SGAT §§ 9.2.2.9.4.1-9.2.2.9.4.2.

^{59/} SGAT § 9.2.2.9.3.

installation was negotiated during the state workshop processes and can be added to any CLEC interconnection agreement in Arizona. ^{60/}

52. To perform a coordinated installation, both companies must be ready at the same time on the scheduled due date. The activities that occur on the due date are critical to the success of an “on time” installation. In order for a coordinated installation to be considered on time, Qwest must perform the following due date activities: contact the CLEC prior to starting the installation; complete the Qwest physical work within a specified time period; and call the CLEC when the job is completed.

53. When coordinated installations involve existing customers, they are often referred to as “hot cuts.” A hot cut involves a “lift and lay” procedure in the central office: a Qwest technician removes the customer’s line from a Qwest switch and attaches it to a CLEC switch. At the QCCC, Qwest employs “hot cut coordinators” who review hot cut orders for accuracy and are responsible for events on the hot cut due date, including final verification of the order, calls to the central office and the CLEC, the lift and lay, dial-tone verification, and notification of completion. Qwest’s commercial performance with respect to hot cuts has been excellent and is discussed in the Commercial Performance Declaration of Dean Buhler.

^{60/} SGAT § 9.2.2.9.7.

54. *Installation of Loops If No Compatible Facilities Exist.* Qwest's policies with respect to the construction of UNEs in Arizona are fully consistent with the ACC's final order on unbundled loops.^{61/} If a CLEC orders an unbundled loop and compatible facilities are available, Qwest will perform incremental facility work (*i.e.*, conditioning, placing a drop, adding a network interface device, adding a card to existing equipment in the central office or remote locations, adding central office tie pairs, or adding field jumper cross-connects) if necessary to complete the order. If the CLEC requests an unbundled loop and compatible facilities are not available, the following process takes place:^{62/}

- If an engineering job is pending that satisfies the request, Qwest will accept the LSR and inform the CLEC of the ready-for-service date.
- If the LSR is requesting a loop to provide an end user with primary voice grade service that would fall under Qwest's Provider of Last Resort ("POLR") or Eligible Telecommunications Carrier ("ETC") obligation, Qwest will accept the order and build the new facility.
- If the request is for the unbundling of a loop supported by IDLC technology, Qwest will accept the LSR and process it according to the process described above for IDLC loops.
- If the LSR does not fall into one of the above categories, Qwest holds the order for 30 business days and continues to attempt to assign compatible facilities.^{63/} If a facility becomes available during the 30 business day period, the order will be released and installed for the retail or wholesale order. The availability of

^{61/} ACC Loops Final Order, ¶¶ 56-62.

^{62/} SGAT §§ 9.1.2.1.3, 9.1.2.1.3.1, 9.1.2.1.3.2.

^{63/} SGAT § 9.2.2.16.

facilities is on a first-come, first-served basis. The CLEC must approve the activity prior to installation of the CLEC order. If after 30 business days compatible facilities still are not available, Qwest will reject the order and inform the CLEC that no compatible facilities exist.^{64/} At any time, the CLEC has the option to request the facilities according to the construction process outlined in the SGAT.^{65/}

55. In a petition for enforcement filed in WC Docket No. 02-314, CLECs recently raised concerns about Qwest's construction policies as they apply to DS1 loops.^{66/} CLECs have raised the same concerns in Arizona and other states in Qwest's territory. In response, Qwest has agreed to provision DS1 loops to CLECs where existing DS0 facilities can be used to construct new DS1 facilities. This policy will remain in effect until rates for the construction of DS1 loops from existing DS0 facilities can be developed. Any remaining CLEC concerns relating to DS1 loops will be addressed in separate proceedings at the Commission and in the states.

3. Maintenance and Repair Process

56. Consistent with Commission requirements,^{67/} Qwest maintains unbundled loops utilizing a defined maintenance and repair flow.^{68/} A CLEC can

^{64/} After 30 business days the CLEC may submit a second order, and Qwest will continue to attempt to assign compatible facilities for another 30-day period.

^{65/} SGAT § 9.19. In addition, Qwest provides notification of major facility builds through the ICONN database. SGAT § 9.1.2.4.

^{66/} *Petition for Enforcement Pursuant to Section 271(d)(6) of the Act*, WC Docket No. 02-314 (filed July 29, 2003).

^{67/} See, e.g., *Second Louisiana 271 Order*, 13 FCC Rcd at 20692 (¶ 145).

report repair problems by issuing repair tickets or by calling Qwest's repair center. Qwest creates a trouble ticket, which is processed using the same systems that are used to process trouble tickets for Qwest retail services. The trouble ticket is passed to the appropriate groups to analyze, test, and repair any Qwest problems that are identified. The repair technician closes the ticket when the CLEC is notified that the trouble is resolved. Qwest will also advise the CLEC if no trouble is found or if the problem is not in the Qwest network.

57. Exhibit WMC-LOOP-9 is a flow chart that delineates the tasks Qwest personnel perform to maintain unbundled loops. This Exhibit also includes a matrix that describes each of the work tasks identified in the flow chart.

58. Qwest charges CLECs for trouble isolation only if the trouble is isolated to the CLEC side of the Loop Demarcation Point or as otherwise provided for in the CLEC's contract.^{69/}

59. *Commercial Volumes.* As of May 31, 2003, Qwest had in service 37,719 unbundled loops for 14 CLECs in Arizona. (These figures represent stand-alone loops only, not those provided as part of a UNE combination.) Specifically, Qwest had in service 30,253 unbundled voice-grade analog loops, 5,578 xDSL-capable loops, and 1,888 high-capacity loops. Qwest's performance in provisioning

^{68/} SGAT § 9.2.5.

^{69/} SGAT §§ 9.2.5.1-9.2.5.3.

and repairing these loops has been outstanding and is described in the Commercial Performance Declaration of Dean Buhler.

III. THE ARIZONA COMMISSION HAS THOROUGHLY REVIEWED QWEST'S UNBUNDLED LOOP OFFERINGS

60. The ACC has thoroughly reviewed Qwest's provisioning of unbundled loops in an open and collaborative process. The first unbundled loop workshop was held on March 5, 2001. In addition to Qwest, parties participating in the workshops included AT&T, MCI WorldCom, Sprint, Electric Lightwave, Inc., e.spire, Eschelon Telecom, and Allegiance Telecom. Parties filed testimony and comments between July 2000 and March 2001. An additional workshop was held on May 14, 2001. Through the workshop process, all but eleven disputed unbundled loop issues were resolved, with the appropriate changes made to the Arizona SGAT.

61. On February 20, 2002, ACC Staff filed a Final Report on Qwest's Compliance with Unbundled Loops. After another round of comments by the parties and a recommendation by an administrative law judge, the ACC issued its final order on unbundled loops on May 17, 2002.^{70/}

62. Most of the significant impasse issues relating to unbundled loops are described in this Declaration. However, two issues relating to loop qualification are discussed in the pre-ordering section of the OSS Declaration of Lynn M.V. Notarianni and Loretta A. Huff. Although other impasse issues arose in

^{70/} ACC Emerging Services Final Order.

the workshop processes relating to unbundled loops, they are not significant for purposes of examining Qwest's Section 271 compliance, and Qwest is in full compliance with the ACC's resolutions of each of them. ^{71/}

IV. SUMMARY AND CONCLUSION

63. Qwest satisfies the unbundled loop requirements of Section 271(c)(2)(B)(iv). Qwest provides unbundled loops in a nondiscriminatory manner to CLECs in Arizona. This Commission should therefore find that Qwest has satisfied Checklist Item 4.

64. This concludes my Declaration.

^{71/} These issues are: 1) allegations of cooperative testing failures, on which the ACC approved Qwest's position; 2) allegations of anticompetitive behavior by Qwest employees, for which the ACC required a change to the SGAT that Qwest promptly made; 3) reciprocity of trouble isolation charges, which the ACC determined had been closed already, and 4) redesignation of interoffice facilities as loop facilities, on which the ACC approved Qwest's policies but required a clarification of those policies in the SGAT. *ACC Loops Final Order*, ¶¶ 87-104, 111-17.

VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct. Executed on 08/22, 2003.



William M. Campbell

BHCP – EXHIBIT 2

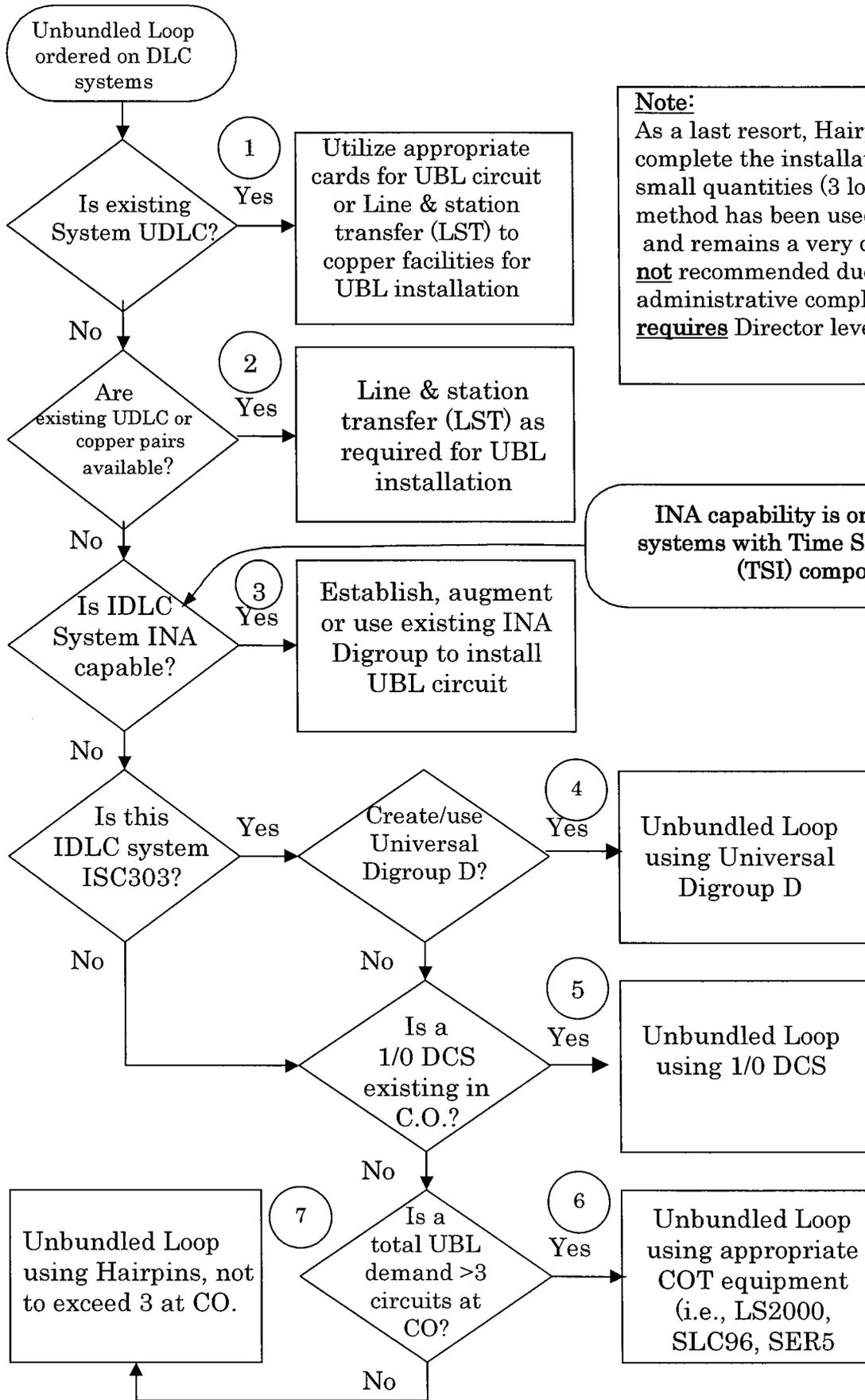
EXHIBITS 3, 4, 5

DIAGRAMS _ SEE FILE

DIAGRAMS NOT SCANNABLE

SEE CASE FILE

BHCP – EXHIBIT 5



Note:
 As a last resort, Hairpins can be used to complete the installation of UBLs in very small quantities (3 loops or less). This method has been used by Qwest in the past and remains a very difficult method, although **not** recommended due to several severe administrative complications. Use of Hairpins **requires** Director level approval to proceed.

INA capability is only possible in systems with Time Slot Interchange (TSI) components.

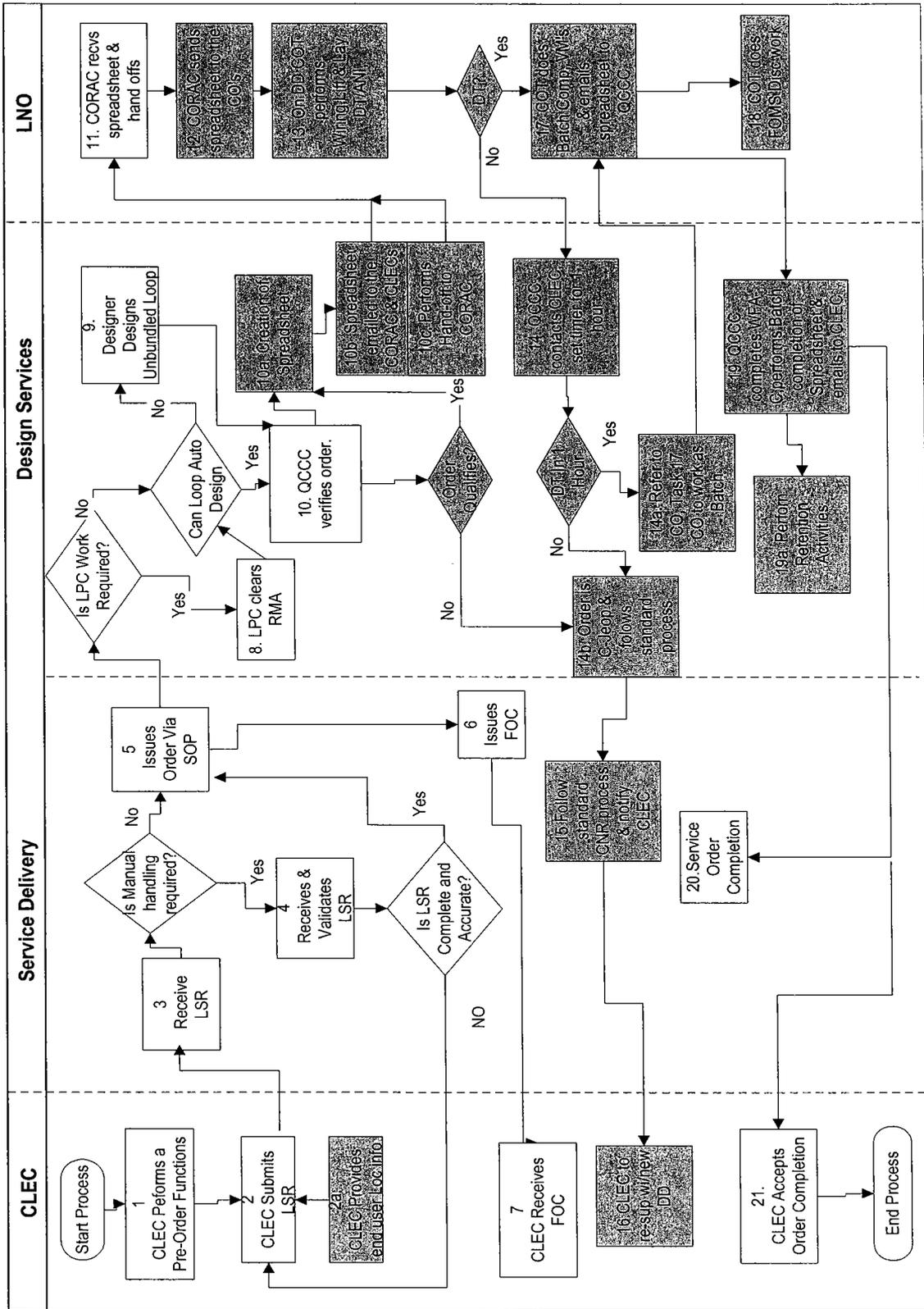
Note:
 Manufacture Discontinued (MD) COT equipment should be obtained from Reuse stock

Legend for IDLC Flow

Solution provisioning intervals:

- 1) UBL circuit cards – 5 days
LST – 5 days**
- 2) LST – 5 days**
- 3) INA Digroup (D4 Channel Bank, dedicated DS1) – 5 days if span capacity**
- 4) Order COT – 90 days – 120 days**
- 5) 1/0 DCS (Adtran BR110) - 90 days – 120 days**
- 6) LS 2000, SLC 96, Series 5 - 90 days – 120 days**
- 7) Hairpin – 15 days after approval**

PROPOSED BATCH HOT CUT PROVISIONING FLOW



Proposed Batch Hot Cut Process Task List

1. CLEC performs per-order loop functions.
2. CLEC submits Local Service Request (LSR) to Qwest.
- 2a. CLEC provides accurate end user service address information to Qwest via LSR.
3. Qwest receives LSR from CLEC.
4. If LSR does not flow through, Qwest validates LSR for completeness and accuracy.
5. If LSR is flow through the service order is automatically created in the Service Order Processor (SOP).
If LSR is not flow through, the Service Delivery Consultant (SDC) issues the service order into the SOP upon completion of Task 4..
6. Qwest issues the Firm Order Confirmation (FOC) to the CLEC.
7. CLEC receives FOC.
8. If necessary, the Loop Provisioning Center (LPC) must clear RMA.
9. Circuit design is created based on the service request. A Word Document is generated and sent to the central office (CO) and field technicians with the information necessary to wire the circuit.
10. QCCC verifies the order for completeness and accuracy. If order does not qualify for the Batch Hot Cut Process, QCCC will follow the standard Customer Not ready (CNR) process (Go to Step 14b).
- 10a. QCCC project manager will create the Batch Hot Cut spreadsheet. Spreadsheet will include: PON#, order #, TN, DT validation, order completion validation.
- 10b. QCCC project manager will email Batch Hot Cut spreadsheet to the CORAC and CLECs.
- 10c. QCCC performs hand-offs to the CORAC for due date activities.

Proposed Batch Hot Cut Process Task List

11. CORAC receives work requests for the handoffs and the spreadsheet. CORAC loads appropriate LNO personnel.
12. CORAC sends spreadsheet to the Central Office.
13. On DD, the COT performs wiring, 'lift and lay', DT/ANI. If NDT, the COT will notify the QCCC.
14. QCCC contacts the CLEC to advise of NDT, QCCC sets a 1 hour timer for CLEC callback to confirm DT now available.
- 14a. CLEC now has DT, QCCC refers the order back to the CO for Batch - go to Step 17.
- 14b. If there is no callback from CLEC or still NDT, QCCC follows the standard process the order(s) is C-Jeop'd.
15. Service Delivery follows standard Customer Not Ready (CNR) process and performs jeopardy notice back to CLEC.
16. CLEC reissues the LSR.
17. COT does Batch completion, voice mails the QCCC, and emails the Batch spreadsheet to QCCC.
18. COT does FOMS disconnect work.
19. The QCCC completes the order in WFA-C, performs completion of spreadsheet and emails to CLEC, billing information flows to the SOP.
- 19a. QCCC follows the standard Record Retention Process.
20. The service order is completed and distributed to other downstream systems such as billing.
21. CLEC accepts order completion.

Batch Hot Cut Process (BHCP) Requirements - Draft

General:

- IDLC, OSP facilities with an EX designation and Line Splitting circuits will not be candidates for the Batch conversions.
- Batch conversions will utilize existing UNE-P, CLEC or Retail facilities.
- Basic Installation only on batch conversions
- Coordinated and/or basic installation is still offered for business as usual activities – for example – requests not identified as part of the conversion or a part of a project managed hot cut.

Qwest Impacting:

- Qwest will continue to perform a line verification test and issue a trouble ticket if trouble is found to exist on the circuit prior to the conversion to UNE-Loop.
- 100 orders (total) per Central Office per day is the limit. (100 is the maximum per office while 25 per central office is the minimum)
- RCMAC – Translations completed on Due Date (“DD”)
- UNE-P with line splitting (511 in AZ, CO, MN, OR, WA) will not be included in the batch conversion – Qwest will provide a list of those TNs (CLEC specific) where line splitting has been deployed by the CLEC and these orders will be scheduled during normal business hours.
- Once an LSR is submitted to Qwest, Qwest will produce a spreadsheet that contains the following information: CLEC PON with 3 letter identifier (e.g., “BHC”), Qwest order number, TN, Qwest project ID #, valid CLEC CBR information

CLEC Impacting:

- CLEC will interface with a Qwest representative(s) to negotiate order entry and the prioritization of the Batch Hot Cut activity.
- CLEC will be responsible for submitting LSR to Qwest - LSR must contain contact information including CLEC contact number and email address.
- PON number assigned will end in “BHC” to identify that the order is a part of the Batch Hot Cut Process.
- CLEC industry standard dial tone needs to be at the ICDF prior to DD.
- If industry standard Dial Tone (“DT”) is not present when a technician is ready to perform the lift and lay, the order will be referred to the CLEC via a phone call for the CLEC to resolve. The CLEC will have one hour to provide industry standard DT. If not resolved by the end of conversion shift or tour, the order, and all lines associated with that specific order, will be jeoped back to the CLEC and will have to be resubmitted following the normal process flow.
- Batch clearing/closing of orders is via the Qwest provided spreadsheet and will be sent to the CLEC provided email address.
- CLEC must complete activation of their subscription for number porting upon notification of order completion.
- If CLEC experiences trouble on the newly converted UNE-Loop within the first 30 days, the CLEC should contact the QCCC for resolution through the warranty group.

Proposed changes to the current hot cut process:

- **CLEC requirements:**
 - CLEC must provide/copy accurate end user service address ..
 - If industry standard dial tone is not available on DD, CLEC will have one hour to resolve the issue or the order will be dropped from the BHCP.

- **Qwest Requirements**

- Qwest will pre-wire the CLEC jumper on due date not on DVA date (DD-2).
- Qwest would submit a spreadsheet to the CLEC of the conversions by CO, by end user, etc. within 24 hours of receipt of the FOC.
- Qwest will not perform the 48 hour pre-due date industry standard DT test in the CLEC's switch terminations.
- Qwest will only notify the CLEC of a no industry standard DT condition on the due date. CLEC will be notified of the No DT condition on the DD (notification is by phone call) and update in TIRKS OSSLOG once the order is jeep'ed to new date.
- DT/ANI test on CLEC switch termination and existing UNE-P terminations will take place on the DD with COT updating TIRKS records upon order completion.
- No email distribution of test results.
- COT will no longer call to RCMAC to work the disconnect of the UNE-P.
- The Central Office process will change to do the FOMs disconnect work the day after the DD.
- Central Office will only call the QCCC if translations are not completed.
- QCCC performs batch close out of CLEC orders using the Qwest generated spreadsheet via email. Close out is completed and is sent to CLEC designated email address.
- LNP activation is verified by both Qwest and CLEC..
- A failure of one order within the batch does not constitute the failure of the entire batch cut.