

“Unbundling”

- A U S WEST enhanced service operation must not use packaged basic network features as part of its enhanced services offering (where the package includes a discount).
- Basic Service Elements and Complementary Network Services must be “unbundled.” That means they are not packaged but rather offered as individual network components at specific rates.
- If an outside provider requests a basic network service that will be used for an enhanced service, U S WEST must provide it as an ONA service if the service meets the specific FCC criteria of utility, sufficient market demand, cost feasibility and technical feasibility. The ONA service request evaluation process must be completed within 120 days. Requests and information provided by an enhanced service provider are proprietary and must not be shared with U S WEST Communications enhanced service operations.

Trials

- Time must be scheduled to train and prepare all channels for technical trials. External enhanced service providers may conduct technical trials of new ONA services at the same time.
- An ONA service must be available for compatibility testing (technical trials) by all outside providers of enhanced services in advance of its use by U S WEST Communications in an enhanced service offering. The time frame for allowing a compatibility test begins when U S WEST Communications file the tariff sheet for the new service. The compatibility test allows an external provider to “trial” the new service, even while U S WEST Communications waits for state tariff approval. U S WEST Communications cannot use that service in its offering until approval is granted.

Disclosure

- If the new service requires a change to the network that may affect other providers of enhanced services or customer premises equipment, U S WEST Communications must inform the enhanced services and CPE industry as soon as a decision is made to change the network.

- U S WEST Communications informs the industry about new basic services through tariffs filed with the FCC and the various states, the *ONA News*, FCC CEI Plan amendments, the InterCONNECTIONS database and Network Disclosure outlets.
- Product managers and developers should be aware that any ONA service planned for use with a U S WEST enhanced service must be included in a CEI Plan or CEI Plan amendment, filed and approved by the FCC. approval takes a minimum of 90 days.

Pricing

- The product must be priced above cost.
- The product must be priced to stimulate development of enhanced service applications and at a rate that optimizes total market demand, not just enhanced service provider market demand.
- ~~Pricing does not advantage U S WEST Communications' internal~~ enhanced service offerings and disadvantage external enhanced service provider offerings (in other words do not price high for a service competing enhanced service providers may need and low for a service which might be used with a U S WEST Communications enhanced service).
- Pricing will be in accordance with all applicable FCC, state and other federal requirements.

APPENDIX 2

Current ONA Services

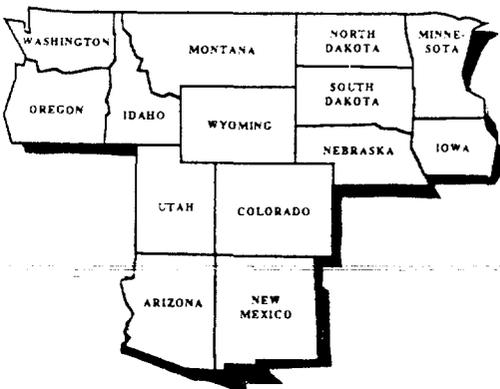
Basic Serving Arrangements (BSAs)	Basic Service Elements (BSEs)	Complementary Network Services (CNSs)
<p>Analog Private Line-D.C. Channel Service</p> <p>Analog Private Line-Low Speed Data Service</p> <p>Analog Private Line-Voice Grade Service</p> <p>Analog Private Line-Audio Service</p> <p>Analog Private Line-Video Service</p> <p>Digital Data Service-64kbps</p> <p>Digital Data Service-64kbps<</p> <p>DS1 Service</p> <p>DS3 Service</p> <p>Packet Switching (x.25)</p> <p>Packet Switching (x.75)</p> <p>Voice Grade-Line-Circuit Switched</p> <p><i>Digital Switched Service-Basic</i></p> <p><i>Feature Group A Service</i></p> <p><i>Flat Rate Line</i></p> <p><i>Foreign Central Office Service</i></p> <p><i>Foreign Exchange Service</i></p> <p><i>ISDN Basic Rate Access (2B+D)</i></p> <p><i>Measured Rate Lines</i></p> <p><i>Message Rate Lines</i></p> <p><i>PBX Trunks</i></p> <p><i>Two-Way Trunk with DID (Analog)</i></p> <p>Semipublic and Shared Coin Lines</p> <p>Simultaneous Voice and Data</p> <p>Voice Grade-Trunk-Circuit Switched</p> <p><i>800 Service</i></p> <p><i>DID Service</i></p> <p><i>DID Switched Access Service</i></p> <p><i>Digital Switched Service-Advanced</i></p> <p><i>Feature Group B Service</i></p> <p><i>Feature Group D Service</i></p> <p><i>ISDN Primary Rate Access (23B+D)</i></p>	<p>Access Service Billing Information</p> <p>ANI Order Entry</p> <p>Alternate Traffic Routing</p> <p>Answer Supervision-Line Side</p> <p>Automatic Loop Transfer (Automatic Protection Switching)</p> <p>Automatic Number Identification (FGB)</p> <p>Automatic Number Identification (FGD)</p> <p>Backup/Redirection (Packet)</p> <p>Bridging</p> <p>CUG Incoming Access Barred (Packet)</p> <p>CUG Outgoing Access Barred (Packet)</p> <p>Call Transfer</p> <p>Call Transfer on DID</p> <p>Called Directory Number Delivery (DID)</p> <p>Caller Identification-Number</p> <p>Caller Identification-Bulk</p> <p>Clear Channel Capability</p> <p>Closed User Group (Packet)</p> <p>COMMAND A LINK</p> <p>DID Trunk Queuing and Basic Announcement</p> <p>Dial Call Waiting</p> <p>Directed Call Pickup</p> <p>Directed Call Pickup with Barge-In</p> <p>Distinctive Alert</p> <p>Fast Select Acceptance (Packet)</p> <p>Flow Control Parameters (Packet)</p> <p>Hunting</p> <p>Improved Transmission Performance</p> <p>Interface Group 6</p> <p>Logical Channel (Packet)</p> <p>Logical Channel Layout (Packet)</p> <p>Make Busy</p> <p>Market Expansion Line</p> <p>Message Delivery Service</p> <p>Message Delivery Service Interoffice</p> <p>Multiple Network Addresses (Packet)</p> <p>Multiple Port Hunt Group (Packet)</p> <p>Multiplexing</p> <p>Network Access Service (960)</p> <p>Nonstandard Window Size (Packet)</p> <p>Permanent Virtual Circuit (Packet)</p> <p>Private Line Conditioning</p> <p>Reverse Charge Acceptance (Packet)</p> <p>Reverse Charge Option (Packet)</p> <p>Secondary Channel</p> <p>Three-way calling</p> <p>Traffic Data Report Service</p> <p>Uniform Call Distribution</p>	<p>Abbreviated Access/Activation (1 or 2 Digit)</p> <p>Auto Call (packet)</p> <p>Call Forwarding-Busy Line</p> <p>Call Forwarding-Busy Line (Expanded)</p> <p>Call Forwarding-Busy Line (Programmable)</p> <p>Call Forwarding-Busy Line/Don't Answer</p> <p>Call Forwarding-Busy Line/Don't Answer (Expanded)</p> <p>Call Forwarding-Don't Answer</p> <p>Call Forwarding-Don't Answer (Expandable)</p> <p>Call Forwarding-Don't Answer (Programmable)</p> <p>Call Forwarding-Variable</p> <p>Call Forwarding-Variable without Call Completion</p> <p>Call Forwarding-Variable Remote Activation</p> <p>Call Rejection</p> <p>Call Trace</p> <p>Call Waiting</p> <p>Continuous Redial</p> <p>Custom Ringing</p> <p>Custom Ringing-Call Forwarding</p> <p>Expanded Answer</p> <p>Hot Line</p> <p>Last Call Return</p> <p>Message Waiting Indication-Audible</p> <p>Message Waiting Indication-Visual</p> <p>Message Waiting Indication-Audible-Visual</p> <p>Priority Call</p> <p>SCAN-ALERT</p> <p>Selective Call Forwarding</p> <p>Single Number Service</p> <p>Speed Calling (8 Number)</p> <p>Speed Calling (30 Number)</p> <p>Voice Dialing</p> <p>Warm Line</p> <p><i>All ONA services used by a U S WEST enhanced service must be outlined in CEI plans or amendments filed with and approved by the FCC during the interim waiver period.</i></p>

APPENDIX 3

Open Network Architecture News

PRODUCT INFORMATION

March 24, 1995



ADVANCED INTELLIGENT NETWORK (AIN) REMOTE ACCESS FORWARDING AND SCHEDULED FORWARDING

Remote Access Forwarding and Scheduled Forwarding are currently offered in the states of Oregon and Washington. Pending individual state approvals, proposed deployment in 1995 includes; Arizona, Colorado, New Mexico, Minnesota, Utah, Iowa, Nebraska, and Idaho. Below is additional information on Remote Access Forwarding and Scheduled Forwarding.

In This Issue

- Advanced Intelligent Network (AIN) Remote Access Forwarding And Scheduled Forwarding
- Revised Availability For Custom Ringing In South Dakota

This publication reviews U S WEST Open Network Architecture activities. It is published for Enhanced Services Providers and ONA Stakeholders.

Service Availability

Due to technical limitations, U S WEST is unable to deploy these services in DMS switches at this time.

Feature Interaction to consider when using these new services:

1. Message Delivery Service (MDS) provisioned Voice Messaging/Mail Systems:

1AESS switch (or 5ESS switch in Oregon and Washington) -

For intra-switch calls: When a call is routed to a shared call forward number of the subscriber's voice mail using Remote Access Forwarding or Scheduled Forwarding, the caller will not receive the subscriber's mailbox, but may instead receive a prompt for their own (the caller's) password, if the caller is also on the same voice mail system.

For inter-switch calls: When a call is routed to a shared call forward number of the subscriber's voice mail system the caller will receive a generic message requesting the caller to reenter the dialed telephone number.

continued on Page 2

**Advanced Intelligent Network (AIN) Remote Access Forwarding and Scheduled Forwarding
Continued from Page 1...**

A 5ESS office has no interaction problems. DID provisioned voice messaging services are not affected by the activation of Remote Access Forwarding or Scheduled Forwarding in 1AESS or 5ESS switches.

2. Call Forward Variable

If a new subscriber to Remote Access Forwarding/Scheduled Forwarding currently subscribes to Call Forward Variable, the Call Forward Variable service will generally be removed from the subscriber's account. U S WEST will allow a customer to have both AIN Remote Access Forwarding/Scheduled Forwarding and Call Forward Variable if the customer is aware of, and understands the feature interactions and limitations. When activated Remote Access Forwarding/Scheduled Forwarding will always take precedence over Call Forward Variable. No matter how many changes are made to Call Forward Variable, Remote Access Forwarding/Scheduled Forwarding will predominate. However, if Remote Access Forwarding/Scheduled Forwarding is deactivated, Call Forward Variable will function normally. Both services must be activated and deactivated independently.

3. Hunting

Remote Access Forwarding/Scheduled Forwarding should be used only on the lead number of the hunt group or on stations with independently addressable terminating numbers. The forwarding service will not be encountered during hunting.

In the February 9, 1995, edition of the *ONA News* we announced that U S WEST planned to make Remote Access Forwarding and Scheduled Forwarding available in Idaho, Iowa, and Nebraska during the third quarter. ~~We plan to move up this~~ schedule to offer the services during the second quarter, pending necessary State Utility's approvals. If you would like to obtain a copy of the February 1995 *ONA News*, please call Linda Williams at 206 345-8477.

Proposed Filing and Rate Structure

Tariffs and price lists are planned to be filed in April and May. The proposed rates are:

	Monthly Rates		Installation Rates	
	Business	Residence	Business	Residence
Colorado				
Remote Access Forwarding	\$7.95	\$7.95	\$10.00	\$8.50
Scheduled Forwarding	\$8.95	\$8.95	\$10.00	\$8.50

continued on Page 3

EDITOR'S NOTES

If you have additions, changes, or deletions to the mailing list, contact Linda Williams at 206 345-8477. Please provide Linda with your company's name, the spelling of your name, a complete mailing address, and return telephone number.

*Advanced Intelligent Network (AIN) Remote Access Forwarding and Scheduled Forwarding
Continued from Page 2...*

	Monthly Rates		Installation Rates			Monthly Rates		Installation Rates	
	<u>Business</u>	<u>Residence</u>	<u>Business</u>	<u>Residence</u>		<u>Business</u>	<u>Residence</u>	<u>Business</u>	<u>Residence</u>
Idaho - South					Nebraska				
Remote Access					Remote Access				
Forwarding	\$8.45	\$8.45	\$12.00	\$12.00	Forwarding	\$7.95	\$7.95	\$10.00	\$6.00
Scheduled					Scheduled				
Forwarding	\$9.45	\$9.45	\$12.00	\$12.00	Forwarding	\$8.95	\$8.95	\$10.00	\$6.00
Iowa					Utah				
Remote Access					Remote Access				
Forwarding	\$6.95	\$6.95	\$22.00	\$13.00	Forwarding	\$6.95	\$6.95	\$11.00	\$8.00
Scheduled					Scheduled				
Forwarding	\$7.95	\$7.95	\$22.00	\$13.00	Forwarding	\$7.95	\$7.95	\$11.00	
Minnesota									
Remote Access									
Forwarding	\$7.60	\$7.60	\$10.00	\$6.00					
Scheduled									
Forwarding	\$8.60	\$8.60	\$10.00	\$6.00					



*To obtain further technical information, please contact the
Interconnect Services Center (formerly known as the Vendor Service Center)
ONA Consultant for your area.*

CUSTOM RINGING FOR SOUTH DAKOTA

Due to the sale of several U S WEST Communications exchanges in South Dakota the service availability that was addressed in the February 9, 1995, issue of *ONA News* has been revised. U S WEST Communications will offer Custom Ringing in the following cities: Aberdeen, Huron, Rapid City, and Sioux Falls.



Effective April 10, 1995, U S WEST will offer free installation for 60 days through June 10, 1995. The installation charge is \$6.00 for residence and \$11.00 for business subscribers.

If you would like to obtain a copy of the February 1995 issue, please contact Linda Williams at 206 345-8477.



**U S WEST Vendor Service
Center ONA Consultants**

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800 373-6152

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602 235-8773

Oregon, Washington

Bill Woodworth
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800 420-8986



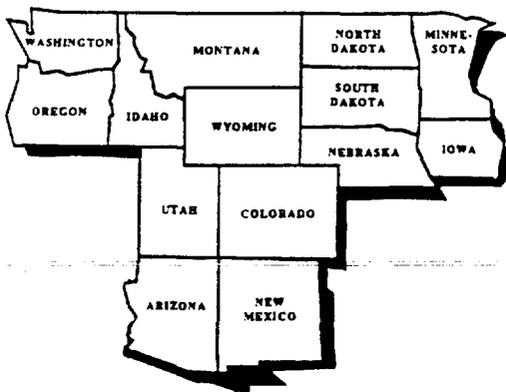
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Open Network Architecture News

PRODUCT INFORMATION

January 24, 1999



U S WEST PLANS TO CHARGE SEPARATE RATES FOR HUNTING SERVICES IN SOUTHERN IDAHO

In This Issue

- U S WEST Plans To Charge Separate Rates For Hunting Services In Southern Idaho
- U S WEST Seeks Volunteers For Subscriber Programmable Ringing Trial
- Free Installation Charges Are Planned For Call Waiting And Caller ID In Selected States

This publication reviews U S WEST Open Network Architecture activities. It is published for Enhanced Services Providers and ONA Stakeholders.

Customers who are served by U S WEST in Southern Idaho may soon be charged separately for "Hunting" services. A filing is planned for early to mid-February to allow for a separate charge for hunting, which is consistent with other U S WEST states. In addition, the filing introduces two new Hunting options: Circular Hunt, and Preferential Hunt.

Currently, the Hunting feature is included with the purchase of a multiline or multitrunk arrangement, regardless of whether it is used. Under the terms of the proposed filing, multiline and multitrunk customers will no longer automatically have the Hunting feature included with their service. Hunting will be ordered and charged separately from the access service. This pricing approach allows customers to have greater control over what services they pay for.

Monthly rates may actually decrease for multiline or multitrunk business customers who do not use the Hunting feature. The amount of the decrease will vary depending on the type and number of access services purchased. Residential customers will not experience a decrease in their rates.

*U S WEST Plans To Charge Separate Rates For Hunting Services In Southern Idaho
Continued from Page 1..*

Service Descriptions.

- **"Hunting"** is simply a feature that permits calls coming in to a busy line or trunk to overflow to other available lines or trunks.
- **Circular Hunt** is an optional feature that allows the incoming call to start at the dialed number and continue in ascending order to the last number in a hunting group of lines or trunks. Once the last number in the group is reached, hunting then proceeds to the first number of the group and continues through each line or trunk until an available line is reached, or the number just preceding the dialed number is reached.
- **Preferential Hunt** enables incoming calls to hunt to a specific number within a hunt group using a unique hunting sequence of lines. The unique hunting sequence is different from the one encountered when a caller dials the first telephone number in the hunt group. Lines or trunks must also be equipped with the basic Hunting feature. This service is available only to business service subscribers.

Service Rates and Availability. Only multiline and multitrunk serving arrangements are affected by the rate change. Services such as single-line access arrangements, DSS, and NARS are not affected.

The basic Hunting feature is currently available in all switched Central Offices. Circular Hunt is available in all Central Offices except the step-by-step or cross-bar switches. Preferential Hunt is limited to the 1AESS serving Central Offices.

In addition to the multiline or multitrunk charge, which is to be reduced for business customers, the following rates are proposed for business and residential subscribers of Hunting services:

	<u>Monthly</u>	<u>Installation</u>
Hunting per line/trunk*	\$8.00	\$12.00
Circular Hunt-per hunt group	\$3.00	\$12.00#
Preferential Hunt-per line/trunk	\$1.00	\$12.00#

This filing will also include a request that Hunting be categorized as a Title 62 (deregulated) product. The description and rates for Hunting will replace Multiline Service language under the Southern Idaho Exchange and Network Services Catalog A5.2.5.

Questions concerning this filing and proposed rates can be answered by your Vendor Services Center ONA Consultant.

* Does not include last line.

Does not apply, if ordered at the same time as hunting by same customer on the same line/trunk.



*To obtain further technical information, please contact
the Vendor Service Center ONA Consultant for your area.*

**U S WEST SEEKS VOLUNTEERS FOR
SUBSCRIBER PROGRAMMABLE RINGING TRIAL**

US WEST will conduct a technical trial of a new Call Forwarding Don't Answer function called Subscriber Programmable Ringing. Subscriber Programmable Ringing builds on the existing Call Forwarding Don't Answer capability. By dialing a two digit access code, subscribers can specify a forwarding interval between 2 and 9 rings. The interval between each ring is six seconds. Increasing the number of rings gives the subscriber more time to answer the phone and is a convenience to incoming callers when the subscriber is not available to answer. The subscriber can redefine the ringing interval at any time at their discretion.

U S WEST is seeking to find current subscribers to Call Forward Don't Answer who obtain their service in Tempe, Arizona, to participate in the trial.

The trial will last 60 days from February 8 - April 8, 1995. The Tempe central office switch serves customers with the following prefixes:

350	829	929
693	858	965
731	894	966
784	902	967
804	921	968

If you want any of your customers who use Call Forward Don't Answer to participate in the U S WEST trial, please call Mike Goebel on 206 346-9125.



EDITOR'S NOTES

If you have additions, changes, or deletions to the mailing list, contact Linda Williams at 206 345-8477. Please provide to Linda your company's name, the spelling of your name, a complete mailing address, and return telephone number.

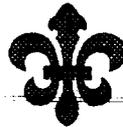
**FREE INSTALLATION CHARGES ARE PLANNED FOR
CALL WAITING AND CALLER ID IN SELECTED STATES**

From February 27 to April 9, 1995, U S WEST will be running a promotion on Call Waiting and Caller ID services in Arizona, Colorado, New Mexico, Oregon and Washington.

Free installation will be offered to new customers of Call Waiting in all five states.

New Caller ID customers will also receive free installation in all five states. In addition, Arizona and New Mexico will be offered a 30 day free trial of the Caller ID display unit.

For more information about this trial, contact your regional Vendor Services Center Consultant.



**U S WEST Vendor Service
Center ONA Consultants**

Iowa, Minnesota, Nebraska, North Dakota, South Dakota

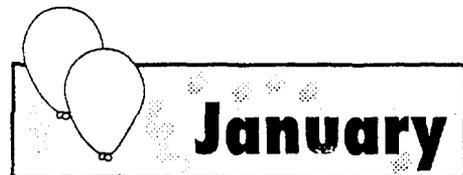
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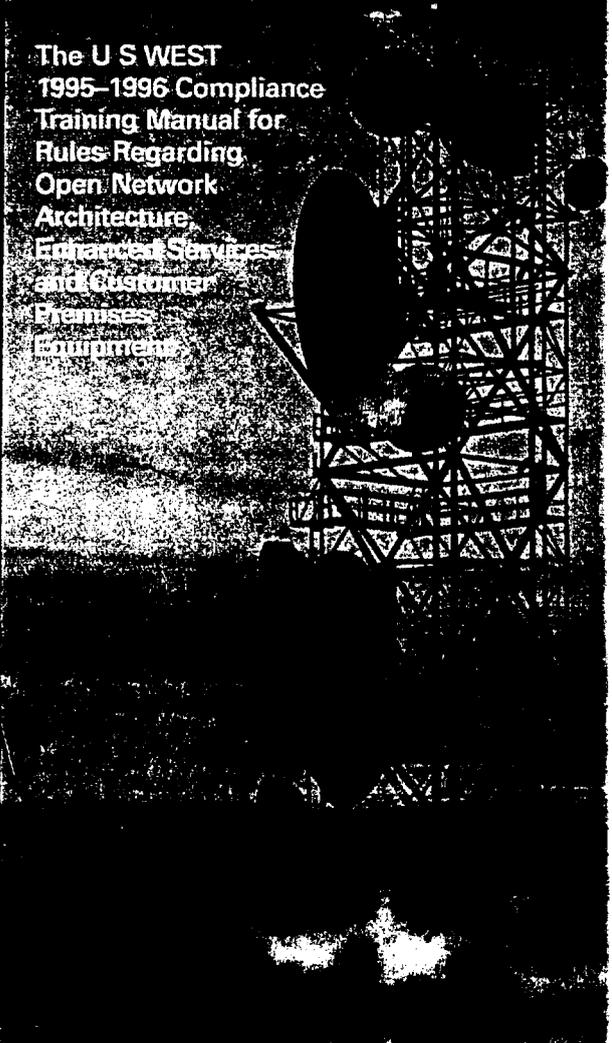
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APPENDIX 4

A high-contrast, black and white photograph of a hand holding a computer keyboard. The hand is positioned in the upper right quadrant, with fingers gripping the keyboard. The lighting is dramatic, highlighting the texture of the hand and the individual keys of the keyboard against a dark background.

Open Network Architecture

A high-contrast, black and white photograph of a satellite dish antenna mounted on a metal lattice tower. The dish is pointed towards the upper right. The background is dark and grainy, suggesting an outdoor setting at night or in low light.

The U S WEST
1995-1996 Compliance
Training Manual for
Rules Regarding
Open Network
Architecture,
Enhanced Services
and Customer
Premises
Equipment

USWEST

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Inside This Open Network Architecture Booklet

This booklet is a brief summary about the Federal Communication Commission's rules concerning Open Network Architecture (ONA), our joint obligation to comply with these rules, and the significance of these rules in today's rapidly changing—and highly competitive—marketplace.

Open Network Architecture (ONA) is a result of the FCC's Computer Inquiry III which provides the ground rules for U S WEST and the other Regional Bell Operating Companies (RBOCs) to “unbundle” the telephone network in innovative ways to benefit consumers. Although called ONA, the scope is enhanced services and allowing consumers to have their network service needs met. ONA provides the regulatory framework in which the RBOCs can compete in the \$500 billion industry of “enhanced services” and “customer premises equipment.”

But with that privilege of competing come strict obligations, as a result of U S WEST and the other RBOCs' dual role in the industry as both a supplier and a competitor in the areas of enhanced services and customer premises equipment. (“Enhanced services” are those which employ computerization in order to bring a variety of information to users over the telephone communications network. Customer premises equipment is customer telecommunications equipment such as telephone sets, modems, answering machines.)

In sum, because the RBOCs control the local telephone network yet also are competitors, the FCC created special rules in order to ensure fair competition to all.

As the FCC has stated and courts have agreed, competition in the enhanced services industry will help create a dynamic network for consumers that will be the foundation of the knowledge-based economy of the 21st century.

On October 18, 1994, the Ninth Circuit Court of Appeals issued an order reversing the FCC's decision permitting U S WEST and other RBOCs to offer integrated enhanced services. Even after this decision takes effect, it is important to comply with the rules set forth in this booklet. This is true for two reasons:

- 1) U S WEST will be permitted, by waiver, to continue to offer enhanced services (e.g., voice messaging) on an integrated basis subject to these rules;
- 2) The Court decision does not prevent the integrated offering of customer premises equipment, which is likewise subject to these rules.

In fact, the Court decision will result in heightened scrutiny of U S WEST's compliance capabilities. The decision should result in increased, not decreased, compliance efforts.

On January 11, 1995, the FCC issued an order outlining the conditions for offering new and existing enhanced services by U S WEST and the other RBOCs during remand proceedings. The terms of this limited waiver are:

For *existing* enhanced services, such as voice messaging, BOCs may continue to provide them under approved Comparably Efficient Interconnection (CEI) plans. These are product-specific plans for enhanced services offerings which ensure nondiscriminatory behavior by U S WEST and the availability of specified basic network services to other enhanced service providers. If new basic services are used to provide or transport these enhanced services, or major changes are made in the enhanced service, the BOCs must file amendments to the CEI plans within 60 days.

For existing enhanced services *not* covered by CEI plans, we must file these plans within 60 days (by March 13, 1995). These plans will be placed on

comment cycles and will be considered approved in 90 days unless the Commission notifies us otherwise. We may continue to provide these enhanced services while the FCC reviews them.

For new *enhanced services*, BOCs must file CEI plans. New enhanced services, however, cannot be provided to customers until the plans are approved by the FCC. New enhanced services are defined as any enhanced service that is not being offered to customers as of January 11, 1995.

For existing *market and technical trials*, BOCs may continue activity. However, market trial notifications for these services must be filed within 60 days of the release of the order (March 13, 1995). Market trials must follow the requirements of the BOC Market Trial Order for any proposed new market trials. Market trials will be deemed approved in 90 days unless the Commission notifies the BOCs otherwise.

For our *video dialtone* enhanced services, we will need to file a service-specific CEI plan.

ONA plan amendments will not be required during remand proceedings. Instead, all basic services proposed for use with our own enhanced service must be outlined in the CEI plans for that service.

U S WEST and the RBOCs must continue to comply with all the safeguards outlined in this booklet. For further information on CEI plan requirements and market trial notification requirements, please see the Appendix in this booklet.

The FCC set forth "nonstructural safeguards" which require compliance by U S WEST and its employees, especially those individuals who deal with enhanced services and customer premises equipment or with the underlying network services that support them. These principles can be remembered as:

-
- 1** Equal Network Interconnection
 - 2** No Preferential Treatment
 - 3** Information Control
 - 4** Advance Disclosure
 - 5** No Subsidization
-

Section II in this booklet provides explanations of these principles, along with checklists and real-life case studies about how to apply these principles in work situations.

An integral part of U S WEST's participation in the information super highway during the current Computer Inquiry III Remand proceedings is the FCC's requirement that U S WEST develop and implement Comparably Efficient Interconnection Plans. Part of U S WEST's Compliance plan requires that employees affected by ONA undergo intense training. Also required is that each employee, upon completion of the training, sign an Employee Certificate of Understanding.

This booklet is divided into seven sections.

Section I—Inside This Booklet; U S WEST's ONA Training, Compliance and Discipline Plan; Training Summary At-A-Glance.

Section II—ONA Rules At-A Glance; The 5 Principles of ONA.

Section III—ONA Product Rules for Managers and Developers; Timeline for New ONA and Enhanced Services; Overview of ONA's 5 Principles for Sales Employees; ONA Services; Current ONA Services; Answers to Quizzes on ONA's 5 Principles.

Section IV—If You Have Questions About ONA—Contacts, Resources.

Section V—CPE Rules Summary.

Section VI—Appendix—Key Dates and Events; Expanded Interconnection and Collocation; CEI Plan Requirements; Market Trial Notification Requirements; Glossary of Usage.

Section VII—ONA/CPE Supplement to U S WEST Code of Conduct

Keep this booklet handy as a general reference. If you have questions, call the experts, whose job it is to help you do your job well. Compliance managers and other experts are listed in Section IV.

U S WEST's ONA Training, Compliance and Discipline Plan

US WEST has developed a Training, Compliance and Discipline Plan which outlines the policies and procedures U S WEST will implement to ensure fair competition and provide all enhanced services providers the same access to basic network services.

There are five basic elements contained in the plan:

- 1 ONA training
- 2 Employee certification
- 3 Detailed market/service unit and job specific training
- 4 Compliance audit reviews
- 5 Disciplinary plan for ONA rule violations

The purpose of U S WEST developing a plan to address training, compliance and discipline is to inform employees of their individual responsibilities for Open Network Architecture compliance. Knowledge and understanding of the FCC's rules concerning ONA enable U S WEST to continue to compete in the information services industry.

The Plan is based on FCC requirements for U S WEST and other Regional Bell Operating Companies (RBOCs). These requirements include implementation of rules of business practice that prohibit preferential treatment for any U S WEST enhanced services operation. The Plan enables U S WEST to meet FCC requirements without creating separate subsidiaries to prevent the possibility of anti-competitive behavior.

The critical nature of the day-to-day conduct of U S WEST employees in observing the rules of compliance cannot be overstated, according to Sandra Sanchez, Director of ONA Compliance. "Indeed, compliance with the FCC rules is one of the most important things U S WEST will be doing over the next several years if

we're going to stay in this growth business," she adds.

At stake are a number of things.

Failure to respond to competitors' network needs can hurt the company not only in the marketplace but also in courtrooms and legislative chambers, where cases are being decided and debates about the involvement of telephone companies in enhanced services and customer premises equipment continue.

How well U S WEST protects the rights of its competitors will determine whether it will be permitted to remain in the rapidly expanding and profitable enhanced services industry.

As Dick McCormick, chairman of U S WEST, Inc., states, "It's important for us to learn what we can and cannot do. Our future as a company and as individual employees depends on it."

Here are details about the Plan's five elements:

1. Training: Annual training is required for all managers. It also is required for all occupational employees of all U S WEST entities who sell or service enhanced products and customer premises equipment, provision network services and/or have access to customer account information containing customer proprietary network information. Employees requiring initial training should do so within 10 days after assuming new responsibilities requiring training, including persons recently promoted, "acting" positions and certain "contract" positions. ONA training is provided by departmental compliance managers. *If an employee is required to undergo ONA training, failure to do so is an ONA violation and subject to disciplinary action.*

2. Employee Certification: Upon completion of training—either initially or annually—the employee must sign the "U S WEST Code of Conduct Corporate Policy Coverage Acknowledgement." By signing the acknowledgement form, employees are certifying they understand the responsibilities of compliance with ONA/CPE rules. A copy of the "ONA/CPE Supplement to U S WEST Code of Conduct Corporate Policy Coverage Acknowledgement" which outlines these

responsibilities appears in Section VII of this booklet. Failure to sign the certification is an ONA violation, subject to disciplinary action.

3. Detailed Market/Service Unit and Job

Specific Training: Employees who work directly with enhanced information services, customer premises equipment or basic services are required to undergo training to receive detailed information as to how the rules apply to their job function. This training is provided by your Business Unit ONA Compliance Manager or Trainer.

4. Compliance Audit Reviews: U S WEST internal auditing periodically conducts reviews to determine compliance with FCC rules, training quality and understanding by employees of the five principles of ONA, the foundation of the Open Network Architecture.

These audits identify and investigate alleged ONA violations and result in disciplinary action, if warranted.

5. Discipline Plan: Violations of required compliance with the ONA principles generally fall within three areas: Training failures, failure to comply with the ONA principles and attempts to use restricted customer-specific information by those employees involved in the sale, marketing or planning of enhanced services or customer premises equipment. *Disciplinary action includes written reprimands, loss of pay, demotion or dismissal.*

Training Summary At-a-Glance

Safeguard	Definition	Employee Responsibilities
Equal Network Interconnection	Network facilities (access arrangements) and unbundled features and functions. These are individual items with specific rates.	Document all requests for new ONA services from enhanced services providers on the U S WEST ONA Service Request Application. Send Application to the Vendor Services Center.
	All internal and external enhanced services providers pay the same price for ONA services.	ONA product technical liaison contacts enhanced services provider within 10 working days as to status of request.
		When developing business cases and financial plans for enhanced services, assume public rates (tariff/price list) and "off-premises" treatment for all ONA services. Although U S WEST enhanced services equipment is collocated in a U S WEST central office, a minimum of a two-mile access rate must be imputed on distance sensitive access services.
No Preferential Treatment	An equal level of installation, maintenance and repair service in providing basic network services (includes customer service records) can be withheld by customer.	Give no preference or priority to U S WEST enhanced services and CPE operations over external providers and their customers.
		Handle work orders for installation and maintenance of basic network services in a nondiscriminatory manner for all enhanced services and CPE providers.
Information Control	Customer Proprietary Network Information: Individual customer record information about basic network services (includes customer service records) can be withheld by customer.	Enhanced services and CPE personnel cannot access restricted CPNI accounts.
		Network-only employees cannot provide restricted CPNI to unauthorized personnel, specifically, enhanced services and CPE sales and marketing employees.
	Aggregated CPNI: A summary of customers' network services information sufficiently combined so the individual customers cannot be identified.	Refer requests to Vendor Services Center or CPNI coordinator.
		Employees involved in the design, planning, provisioning or sale of enhanced services or CPE cannot use aggregated CPNI without the approval of the CPNI coordinator.
		Use of aggregated CPNI by U S WEST enhanced services or CPE personnel is contingent on it being available to competitors under equal terms.
Advance Disclosure	Information about planned changes to the basic network and interfaces that may affect an enhanced services or CPE provider's use of the network must be disclosed before the change.	Network and product-planning employees must contact the network disclosure coordinator to decide whether the network change requires disclosure.
		Network disclosure coordinator must inform industry at "make/buy" point. Public must be notified 12 months before deployment of market trial or at "make/buy" point. If the make/buy decision is less than 12 months before product introduction or market trial, disclosure must be made to the public and the enhanced services and CPE industries at the same time. No less than six months notice can be given.
No Subsidization	Part 64/32 accounting method that separates costs of regulated and non-regulated activities.	Incorporate Part 64/32 accounting principles when developing financial analysis/business case for each new product.
		Enhanced services and CPE product managers/developers work closely with Part 64 accounting representatives to determine whether changes to the Cost Allocation Manual will be required.
		All time and expenses associated with planning new nonregulated services must be tracked under Part 64.
		Allow at least 60 days to prepare Cost Allocation Manual for filing with the FCC. After the filing, another 60 days must pass before the new enhanced service can be used.
		Part 32 accounting applies to affiliate transactions and asset transfers between U S WEST Communications and affiliates.

ONA Rules at a Glance

The FCC has instituted five rules governing Open Network Architecture with which U S WEST and its employees must comply. U S WEST must offer all enhanced services and CPE in accordance with these rules.

Briefly, these five FCC rules of "ONA" are:

1. Equal Network Interconnection
2. No Preferential Treatment
3. Information Control
4. Advance Disclosure
5. No Subsidization

Statement of the Rules:

1. Equal Network Interconnection. U S WEST will make the *same basic network services* available to all providers of enhanced services and customer premises equipment at the same prices and on the *same terms and conditions*.

2. No Preferential Treatment. U S WEST will provide the *same quality and timeliness of basic network services, repair and installation to our competitors* as we do to our own internal enhanced services and customer premises equipment operations.

3. Information Control. *Customers have the right to control access to information about the network services they use.* Customers can decide whether or not they want U S WEST employees who sell enhanced services and customer premises equipment or external providers to access their local telephone service records.

4. Advance Disclosure. *When U S WEST decides to deploy a new product which provides or relies on a new basic network interface or requires a change to an existing network interface, we must promptly disclose to all other providers of enhanced services and customer premises equipment.*

5. No Subsidization. U S WEST *will not subsidize our enhanced services and customer premises equipment businesses with revenues from basic service ratepayers.*

Note to U S WEST employees: Failure to comply with these rules can result in disciplinary action, up to and including dismissal. In addition, U S WEST could be denied its continuing participation in a \$500 billion enhanced services marketplace.

The Five Principles of ONA

Principle 1 Equal Network Interconnection.

U S WEST will make the same basic services available to all providers of enhanced services and customer premises equipment at the same prices and on the same terms and conditions.

First, the terms

Before you can apply Principle 1 you must understand what is meant by "enhanced services" and "customer premises equipment."

"Enhanced services" are those services that involve changing, storing or modifying the information on common carrier facilities. An example is Voice Messaging which is carried on U S WEST's basic common carrier network and stores messages and allows subscribers to retrieve those messages. Other examples of enhanced services: FAX store and forward. On-line data base access. Protocol conversion. Level 2 video dialtone. Point of Sale transactions. Audiotex and audio classified services. On-line data base transactions. These enhanced services are in contrast to "basic services," which are "pure transmission" common carrier services. The FCC drew a "bright line" to distinguish between basic and enhanced. Therefore, it is important you understand the distinction. "Customer premises equipment" is simply basic customer telecommunications equipment, for example, telephone sets, PBXs, modems and answering machines.

The reasons behind Principle 1

Principle 1 stands for equality. Equal network interconnection allows other enhanced services providers to have the same access to network services as U S WEST's own enhanced services operations. The ONA model allows for the "unbundling" of features and functions from the underlying network transport. That means they are offered as individual network components at specific rates. All basic network services provided to external enhanced service providers must provide the same quality, functionality and technical

standards as those used to provide a U S WEST enhanced service.

Before ONA, if an enhanced services provider wished to create an enhanced service, the provider often was limited to buying tariffed network services from U S WEST. And, some of those network services that the provider needed were pre-packaged with services the provider didn't want or need.

Now, when an enhanced services provider requests new or existing network features, U S WEST looks at developing those features. Often the providers want the services in a simpler functional form at a lower rate than the tariff may initially provide. This principle allows providers who rely on the network to transport their information services to their customers to buy the services a la carte in order to build their enhanced service.

ONA Services are divided into three categories:

- ◆ Basic Serving Arrangements (BSAs) or transport
- ◆ Basic Service Elements (BSEs) or features and functions
- ◆ Complementary Network Services (CNSs) or end user features

For more details, please see Section III.

A critical part is ONA basic network service

Whenever a basic network service is used to provide an enhanced service, either by U S WEST or another company, that basic service is defined as an "ONA service" and must follow certain

*Note to U S WEST employee: Failure to comply with Principle 1, Equal Network Interconnection, can result in dismissal and potentially grave injury to U S WEST's business operations.