

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Application by Verizon New Jersey)
Inc., Bell Atlantic Communications,)
Inc. (d/b/a Verizon Long Distance),) CC Docket No. 01-____
NYNEX Long Distance Company)
(d/b/a Verizon Enterprise Solutions),)
Verizon Global Networks Inc., and)
Verizon Select Services Inc., for)
Authorization To Provide In-Region,)
InterLATA Services in New Jersey)

DECLARATION OF PAUL A. LACOUTURE

AND

VIRGINIA P. RUESTERHOLZ

1. My name is Paul A. Lacouture. My business address is 1095 Avenue of the Americas, 41st Floor, New York, New York. I am employed by Verizon Services Group as President – Network Services Group. In this capacity, I am responsible for Verizon’s annual capital program and for network planning, engineering, and day-to-day network operations, as well as for Verizon’s Administrative Services, Technology Planning, and Wholesale Marketing, Sales and Operations. I am accountable for the entire declaration.

2. I have more than 29 years experience in the telecommunications industry, in a variety of engineering and operations positions working for NYNEX, Bell Atlantic and now Verizon. Prior to my current position, I served as the chief technology and engineering officer for Bell Atlantic immediately following the merger with NYNEX.

88. Verizon's repeat trouble report rates for CLEC POTS Loops (MR-5-01), when calculated under the new guidelines adopted by the New York PSC for this performance measure, are in parity. *See New York Service Quality Order* at 4 (App. J, Tab 18). The New York PSC concluded that "Verizon's metrics for unbundled network element loop products have been impacted by factors beyond the company's control." *Id.* Specifically, the New York PSC found that "CLECs are responsible for testing and directing Verizon to dispatch its repair technicians either 'in' (to the central office) or 'out' (to the outside plant). On dispatches out, CLECs are also responsible for ensuring the Verizon technicians will have access to end user premises to verify that troubles are not caused by customer premises equipment." *Id.* Based on consensus agreement of the participating parties, the New York PSC modified the guidelines for this performance measure "to eliminate the so-called 'double trouble' phenomenon which occurs when the CLEC misdirects Verizon to dispatch a technician either inside or outside the central office and no trouble is found. In this case, the trouble ticket must be closed and the CLEC must initiate a second ('double') trouble ticket directing dispatch in the opposite direction." *Id.* This performance measure change should likewise be implemented in New Jersey. During August, September and October 2001, Verizon's repeat trouble report rate under the new business rules adopted by the New York PSC was 20.53 percent for CLECs and 18.70 percent for the retail comparison group. *See Attachment 10.* This small difference is not competitively significant.

b. Hot Cuts

89. Verizon uses essentially the same methods and procedures in New Jersey to perform hot cuts as in the other Verizon states the FCC has found to be checklist

compliant. These methods and procedures were reviewed in great detail and found to be satisfactory by the Massachusetts DTE and the FCC. KPMG has reviewed Verizon's hot cut practices, procedures, and methodologies pertaining to Verizon's delivery of collocation services to the wholesale marketplace in New Jersey and found that Verizon satisfied each and every test. *See KPMG Final Report at 232-233 (App. C, Tab 4).*

90. In December 2000, Verizon's hot cut process received ISO 9000 certification from the International Organization of Standardization. As we explained earlier, this independent certification demonstrates that Verizon has a high quality and well developed structure in place for handling hot cuts. Verizon's hot cut process was recertified by ISO in May 2001 and again in November 2001.

91. The hot cut process is designed to move a POTS loop that is in service from Verizon's switch to the CLEC's switch. This requires coordinated work efforts by both Verizon and the CLEC. The CLEC can request that each voice grade hot cut be scheduled for completion during a specific appointment window, with the objective being that the customer be out-of-service for no more than five minutes. Alternatively, if the CLEC wishes to hot cut a large group of lines, the entire group can be handled on a project basis, where Verizon's technician coordinates with the CLEC's technician to cut one loop right after another in a particular central office.

92. The hot cut process includes a number of steps that Verizon and the CLEC must take during the several days preceding the actual hot cut. These steps include pre-wiring a cross-connection from the CLEC's collocation arrangement to Verizon's main distribution frame prior to the actual committed date and time of the migration or cut. During this phase of the process, Verizon has agreed to test for the CLEC's dial tone

because most CLECs do not have the ability to test their own circuits. All of the steps of the hot cut process are set forth in Attachment 11.

93. Verizon has continued to work with the industry since the time of the New York proceeding to make further improvements to the hot cut process. For example, Verizon and several CLECs have developed a process to perform multiple hot cuts on a project basis. This approach helps to eliminate numerous phone calls between Verizon and the serving CLEC, and to ensure end user satisfaction. Verizon has also developed a web-based system to track and manage hot cut orders that virtually eliminates the need to place multiple phone calls between Verizon and the CLEC.

94. Verizon's hot cut performance in New Jersey is excellent. During August, September and October 2001, Verizon completed, on average, 97.42 percent of its hot cut orders on time. *See* Attachment 12.

95. As previously explained, the New York PSC has decided to eliminate average interval completed measures from the Carrier-to-Carrier Performance Reports. These changes will be implemented in Carrier-to-Carrier Performance Reports for New York and Massachusetts beginning with the November 2001 report month and should likewise be implemented in New Jersey. There is no reason for the Commission to consider or rely upon these measures. Nonetheless, these measures show that Verizon is provisioning hot cut loops in a timely manner. During August, September and October 2001, Verizon completed hot cuts in New Jersey within, on average, 6.20 days, which is just slightly longer than the standard six day interval for orders of 1-9 lines. *See* Carrier-to-Carrier Performance Reports (Guerard/Canny/DeVito Decl., Att. 1).

96. The New Jersey Carrier-to-Carrier Performance Reports include a retail comparison group for hot cut average interval completed performance. This retail comparison group is completely inappropriate because it includes orders for feature changes with a standard interval of one or two days. *See* Guerard/Canny/DeVito Decl.

97. Verizon's installation quality performance for hot cuts is not reported on New Jersey Carrier-to-Carrier Performance Reports. Nonetheless, Verizon has calculated its hot cut installation quality performance under the New York guidelines (troubles reported within 7 days of installation) and those calculations show that Verizon's hot cut installation quality performance is excellent. During August, September and October 2001, 0.46 percent of CLEC hot cuts had reported troubles within 7 days of installation. *See* Attachment 13.

c. High Capacity Loops

98. Verizon offers CLECs unbundled access to high capacity (DS-1 and DS-3) loops in New Jersey in the same manner as in the other Verizon states the FCC has found to be checklist-compliant. High capacity loops are available in New Jersey under interconnection agreements. *See* Attachment 1.

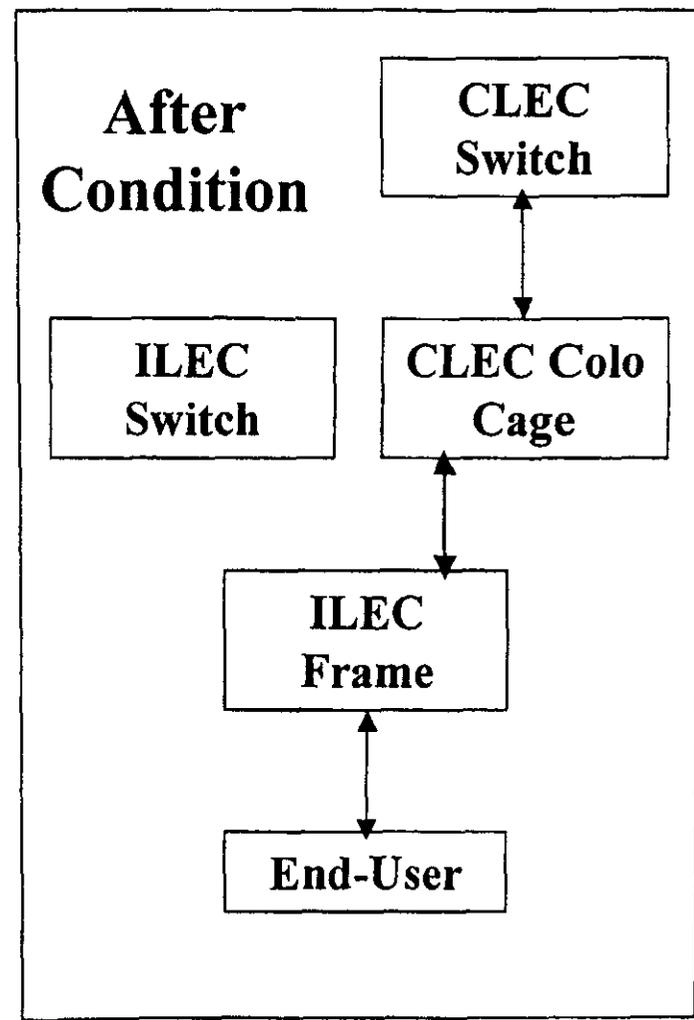
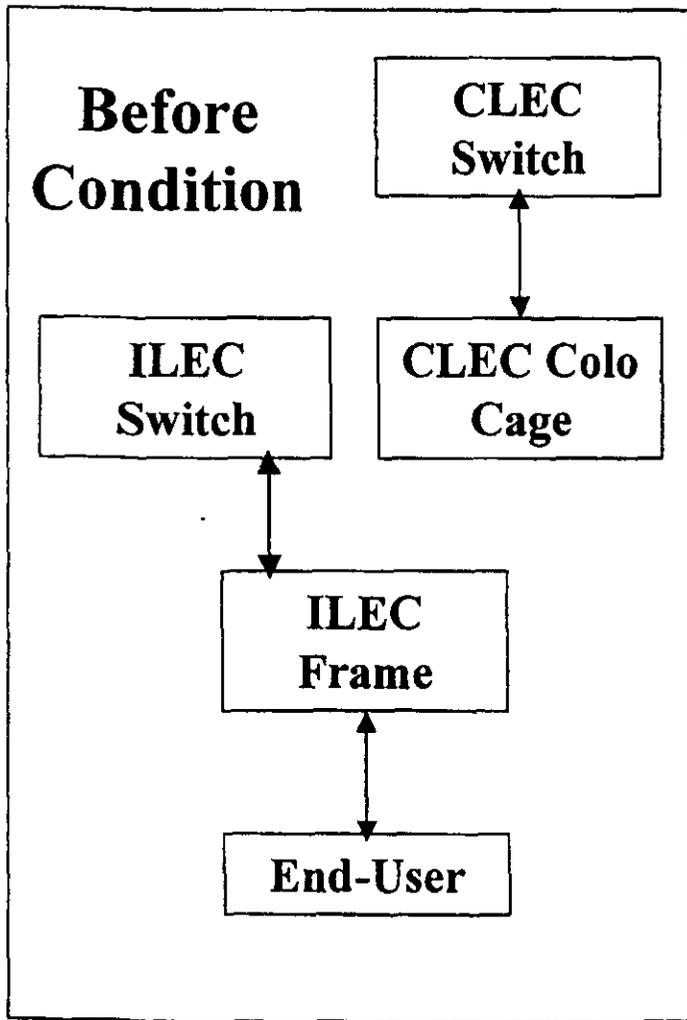
99. As of October 2001, Verizon has provisioned about 190 high capacity DS-1 loops, and no high capacity DS-3 loops in New Jersey. High capacity loops in New Jersey represent only about 0.2 percent of all unbundled loops provisioned to competitors.

100. During August, September and October 2001, Verizon provisioned only about 25 DS-1 loops per month in New Jersey. With so few orders, Verizon's monthly

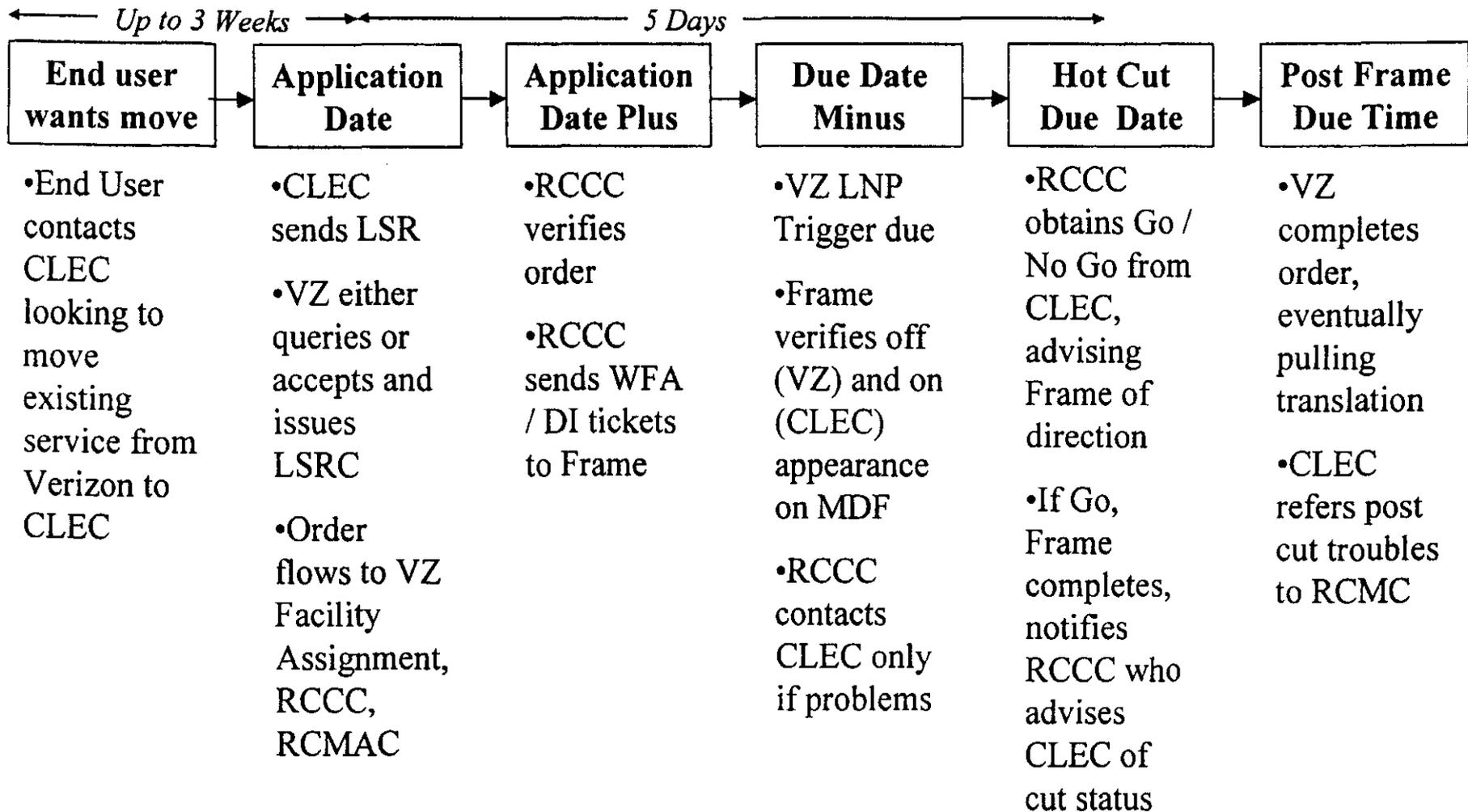
**DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 11

Simplified Hot Cut



Simplified Hot Cut Process



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Hot Cut Guidelines

CO-CL-04-0001/ Rev. 10

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Core Tests to be Performed on all Unbundled Loops

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Core Tests to be Performed on all Unbundled Loops

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Core Tests to be Performed on all Unbundled Loops

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Product Definitions

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Exhibit WMC-LOOP-9

Coordinated Installation "New Unbundled Loops"

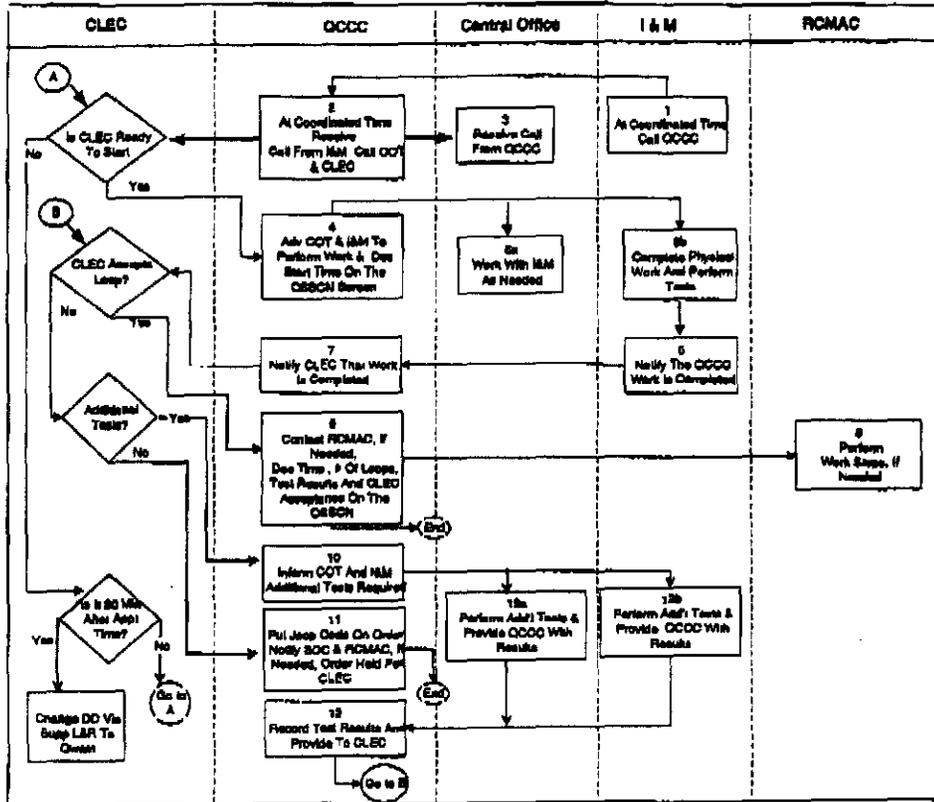


Exhibit WMC-LOOP-9

Coordinated Installation New Loops Process Task List

Task #	Activity
1	At the requested appointment time the Qwest Installation Technician (I&M) contacts the Qwest CLEC Coordination Center (QCCC) to indicate readiness to start the cut.
2	The QCCC contacts the Central Office Technician (COT) and the CLEC to determine readiness.
3	COT on standby alert for testing
4	QCCC tells I&M and COT to start and documents the start time on the OSSCN screen in WFA.
5a	COT performs any tests requested by I&M
5b	I&M completes the wiring at the end user location and performs required tests.
6	The I&M notifies the QCCC that the work is complete and provides the test results.
7	The QCCC documents the stop time and notifies the CLEC that the work is complete.
8	Once CLEC accepts the loop, QCCC contacts RCMAC, if needed, and documents the cut information on the OSSCN screen in WFA.
9	RCMAC completes any necessary work.
10	CLEC does not accept the loop, so a jeopardy code is entered on the order and the Service Delivery Coordinator (SDC) and the RCMAC are notified that the order will not be completed.
11	CLEC wants additional tests so QCCC notifies COT and I&M.
12a	COT participates as needed in additional tests.
12b	I&M participates as needed in additional tests and provides QCCC with the results.
13	QCCC provides results and ensures CLEC has test results via phone call. If the CLEC has purchased Cooperative or Performance Testing, the test results are also forwarded to the CLEC via email within two business days of order completion.

UNBUNDLED LOOP PROVISIONING FLOW

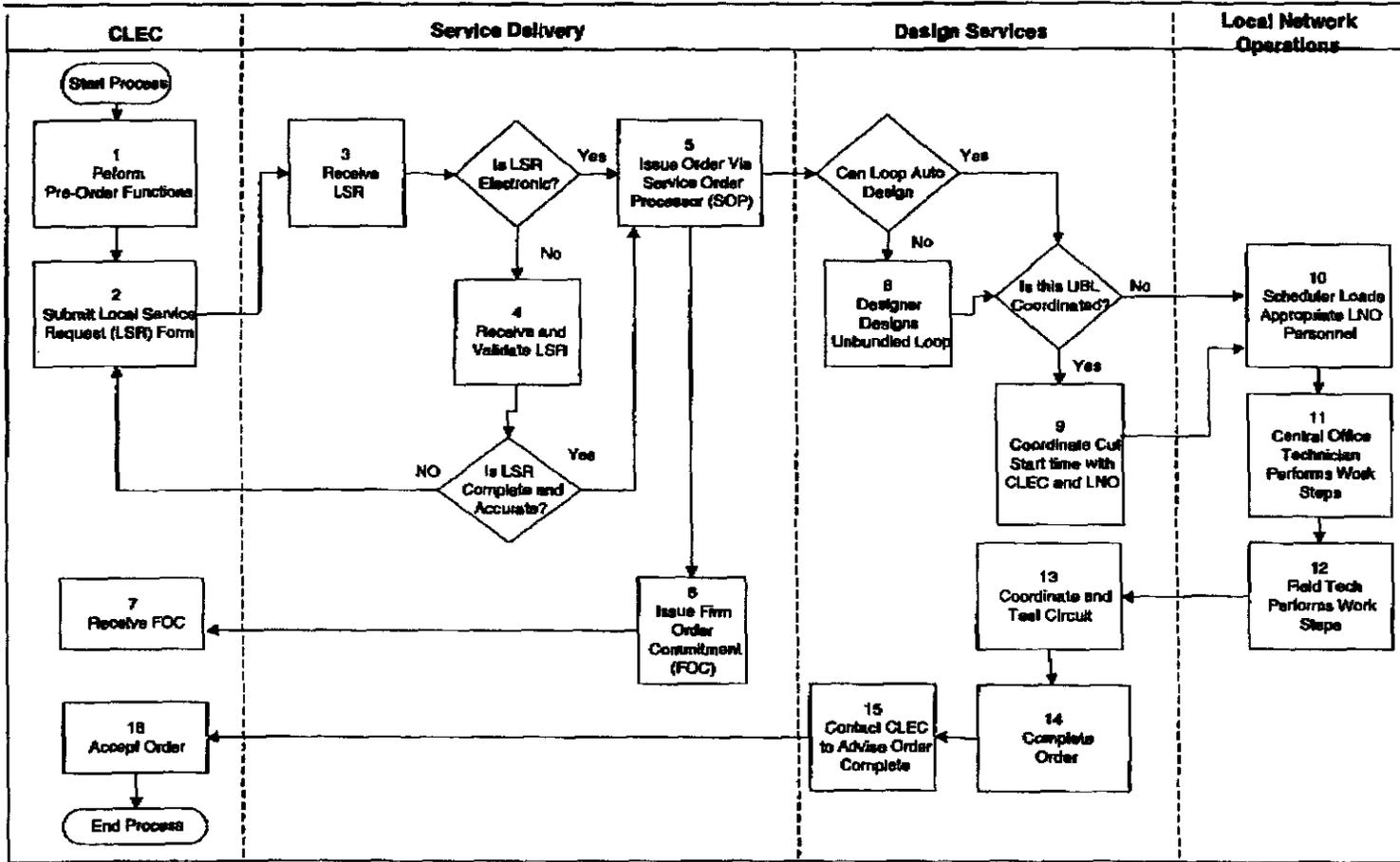


Exhibit WMC-LOOP-4

Unbundled Local Loop Provisioning Task List

Assoc. Task #	Process
2-Wire & 4-Wire Voice Grade Analog	
1	CLEC performs pre-order loop functions. The results will assist the CLEC in determining the best loop to purchase that will meet their specific needs.
2	Local Service Request (LSR) form submitted to Qwest by means of IMA, EDI or faxing
3 and 4	If faxed, Service Delivery Coordinator (SDC) reviews LSR and associated forms for completeness. Verification includes checking: CLEC certification, Letter of Authorization (LOA), Summary Bill Number, CLEC Termination Point, Network Channel (NC) and Network Channel Interface (NCI) codes, CLEC Due date interval and facilities. If sent via IMA or EDI, the LSR is converted to 1 or more service orders and sent to the service order processor (SOP).
5	The SDC issues the Service Order into the Qwest Service Order Processor (SOP). Then the service order is sent to the appropriate work groups including the Design Services Center.
6	The SDC issues the Firm Order Commitment (FOC) and sends it to the CLEC. IMA or EDI will send the FOC to the CLEC when the LSR is processed electronically.
7	CLEC receives FOC
8	On the Record Order Issue Date (RID), the circuit design is created based on the service order request. The design document or Word Document provides the central office and field technicians with the information necessary to wire the circuit.
9	For coordinated cuts the QCCC coordinates the cuts with the CLEC and the Qwest technicians. This step does not take place for non-coordinated cuts.
10	Provisioning work request received in Local Network Operations.
11	On the Design Verified and Assigned (DVA) the central office technician wires the circuit according to the Word Document specifications.
12	On the Plant Test Date (PTD) the field work at end user's premise performed if required. A test from the NID to the wire center is performed in conjunction with the central office technician.
13	For coordinated cuts the field technician calls the design center at the pre-scheduled Appointment Time from the CLEC customer's location. Then the design center calls the Central office and the CLEC. The design service center confirms that the CLEC is ready. The CLEC has the option of staying on line or dropping off. The required tests are performed and the test results are recorded. If the CLEC has purchased cooperative testing, then the test results are forwarded to the CLEC.
14	The design center completes the order.
15	CLEC notified via phone call to accept service.
16	CLEC accepts the circuit.

Qwest

Colorado Non-Recurring Rates Comparison (Loop Installation-First)-SBC

Ln	Rate Element	Source	TX			OK			KS			MO			CO
			Analog	Digital	4-Wire										
Nonrecurring Rate-First															
1	Analog Loop Cross Connect	Rate Sheet	\$ 15.03	\$ 15.03	\$ 15.03	\$ 24.38	\$ 60.61	\$ 28.13	\$ 23.06	\$ 15.03	\$ 47.60	19.55	43.33	\$ 21.58	
2	Cross Connect-Collocation w/o Testing Service Order Charges	Rate Sheet	\$ 6.91	\$ 6.91	\$ 29.56	\$ 35.15	\$ 35.15	\$ 43.78	\$ 13.69	\$ 17.29	\$ 20.45	14.97	14.97	\$ 25.38	
3	Manual	Rate Sheet	\$ 2.58	\$ 2.58	\$ 2.58	\$ 23.38	\$ 95.55	\$ 95.55	11.25	11.25	11.25	\$ 5.00	\$ 5.00	\$ 5.00	
4	Mechanized	Rate Sheet	\$ 5.00	\$ 5.00	\$ 5.00	\$ 3.33	\$ 3.33	\$ 3.33	\$ 2.35	\$ 2.35	\$ 2.35	\$ 5.00	\$ 5.00	\$ 5.00	
Disconnection															
5	Manual	Rate Sheet	\$ 1.22	\$ 1.22	\$ 1.22	\$ 11.69	\$ 52.41	\$ 52.41	\$ 11.25	\$ 11.25	\$ 11.25	\$ 5.00	\$ 5.00	\$ 5.00	
6	Mechanized	Rate Sheet	\$ 5.00	\$ 5.00	\$ 5.00	\$ 3.33	\$ 3.33	\$ 3.33	\$ 2.35	\$ 2.35	\$ 2.35	\$ 5.00	\$ 5.00	\$ 5.00	
Installations-Including Disconnection															
7	Manual	L1+L2+L3+L5	\$ 25.74	\$ 25.74	\$ 48.39	\$ 94.60	\$ 243.72	\$ 219.87	\$ 59.25	\$ 54.82	\$ 90.55	\$ 44.52	\$ 68.30	\$ 56.96	
8	Mechanized	L1+L2+L4+L6	\$ 31.94	\$ 31.94	\$ 54.59	\$ 66.19	\$ 102.42	\$ 78.57	\$ 41.45	\$ 37.02	\$ 72.75	\$ 44.52	\$ 68.30	\$ 56.96	
9	Percent Manual Orders	Assumption	12%	12%	12%	12%	12%	12%	12%	12%	12%	12%	12%	12%	
10	Weighted	L7*L9+L8*(1-L9)	\$ 31.20	\$ 31.20	\$ 53.85	\$ 69.60	\$ 119.38	\$ 95.53	\$ 43.59	\$ 39.16	\$ 74.89	\$ 44.52	\$ 68.30	\$ 56.96 \$ 55.27	
Coordination and Testing															
11	Cross Connect-Collo w/ Testing	Rate Sheet	\$ 4.72	\$ 4.72	\$ 29.56	\$ 30.25	\$ 30.25	\$ 46.51	\$ 17.29	\$ 17.29	\$ 29.56	\$ 26.87	\$ 26.87	\$ 31.22	
12	Cross Connect-Collo w/o Testing	Rate Sheet	\$ 6.91	\$ 6.91	\$ 29.56	\$ 35.15	\$ 35.15	\$ 43.78	\$ 13.69	\$ 17.29	\$ 20.45	\$ 14.97	\$ 14.97	\$ 25.38	
13	Testing Additive Time and Materials Charged for Coordination & Testing	L.11 - L.12	\$ (2.19)	\$ (2.19)	\$ -	\$ (4.90)	\$ (4.90)	\$ 2.73	\$ 3.60	\$ -	\$ 9.11	\$ 11.90	\$ 11.90	\$ 5.84	
14	Basic Time-per quarter hour	Rate Sheet	\$ 21.44	\$ 21.44	\$ 21.44										
15	Basic Time-per half hour	Rate Sheet / L.14*2	\$ 42.88	\$ 42.88	\$ 42.88	\$ 37.11	\$ 37.11	\$ 37.11	\$ 46.76	\$ 46.76	\$ 46.76	\$ 30.93	\$ 30.93	\$ 30.93	
Basic Installation with Testing (1.5 Hours)															
16	Manual	L7+L13+L.15*3	\$ 152.19	\$ 152.19	\$ 177.03	\$ 201.03	\$ 350.15	\$ 333.93	\$ 203.13	\$ 195.10	\$ 239.94	\$ 149.21	\$ 172.99	\$ 155.59	
17	Mechanized	L8+L13+L.15*3	\$ 158.39	\$ 158.39	\$ 183.23	\$ 172.62	\$ 208.85	\$ 192.63	\$ 185.33	\$ 177.30	\$ 222.14	\$ 149.21	\$ 172.99	\$ 155.59	
18	Weighted	L16*L9+L17*(1-L9)	\$ 157.65	\$ 157.65	\$ 182.49	\$ 176.03	\$ 225.81	\$ 209.59	\$ 187.47	\$ 179.44	\$ 224.28	\$ 149.21	\$ 172.99	\$ 155.59 \$ 142.10	
Total Coordinated Installations (15 Min)															
19	Manual (1)	L7+L.15*.5	\$ 47.18	\$ 47.18	\$ 69.83	\$ 113.16	\$ 262.28	\$ 238.43	\$ 82.63	\$ 78.20	\$ 113.93	\$ 59.99	\$ 83.77	\$ 72.43	
20	Mechanized (1)	L8+L.15*.5	\$ 53.38	\$ 53.38	\$ 76.03	\$ 84.75	\$ 120.98	\$ 97.13	\$ 64.83	\$ 60.40	\$ 96.13	\$ 59.99	\$ 83.77	\$ 72.43	
21	Weighted	L19*L9+L20*(1-L9)	\$ 52.64	\$ 52.64	\$ 75.29	\$ 88.15	\$ 137.93	\$ 114.08	\$ 66.97	\$ 62.54	\$ 98.27	\$ 59.99	\$ 83.77	\$ 72.43 \$ 59.81	
Total Coordinated Cut with Testing (2 Hours)															
22	Manual	L7+L13+L.15*4	\$ 195.07	\$ 195.07	\$ 219.91	\$ 238.14	\$ 387.26	\$ 371.04	\$ 249.89	\$ 241.86	\$ 286.70	\$ 180.14	\$ 203.92	\$ 186.52	
23	Mechanized	L8+L13+L.15*4	\$ 201.27	\$ 201.27	\$ 226.11	\$ 209.73	\$ 245.96	\$ 229.74	\$ 232.09	\$ 224.06	\$ 268.90	\$ 180.14	\$ 203.92	\$ 186.52	
24	Weighted	L22*L9+L23*(1-L9)	\$ 200.53	\$ 200.53	\$ 225.37	\$ 213.14	\$ 262.92	\$ 246.70	\$ 234.23	\$ 226.20	\$ 271.04	\$ 180.14	\$ 203.92	\$ 186.52 \$ 171.87	

Note 1: Incremental testing charges are applied in one half hour increments for OK, KS and MO

Note 2: It is Qwest's understanding that the time and materials charges apply to coordination activities. If not then the coordinated installation rates would = the basic rates.

Changed since original filing of Thompson Exhibit

Based on Qwest interpretation of the rates in the other RBOCs published SGATs

Qwest

Colorado Non-Recurring Rates Comparison (Loop Installation-First)-Verizon

Ln	Rate Element	2 Wire Analog Loop		4 Wire Analog Loop (3)		NY "Hot Cut" (4)	ADSL Compatible (3)	HDSL Compatible (3)	CO All Types
Rate Ordered By NY Commission									
Nonrecurring Rate-First									
1	Provisioning	Rate Sheet	\$ 0.13	\$ 0.13		See Below	\$ 0.13	\$ 0.13	
Cross Connect									
2	Service Connection CO Wiring	Rate Sheet	\$ 39.59	\$ 40.14		See Below	\$ 39.60	\$ 39.60	
Service Order Charges									
3	Manual Intervention	Rate Sheet	\$ 26.56	\$ 26.56	\$ 26.56	\$ 29.09	\$ 29.09	\$ 29.09	
4	Mechanized	Rate Sheet	\$ 9.01	\$ 9.01	\$ 9.01	\$ 10.94	\$ 10.94	\$ 10.94	
5	Composite Assuming 12% Manual	L4+L3*12%	\$ 12.20	\$ 12.20	\$ 12.20	\$ 14.43	\$ 14.43	\$ 14.43	
6	Total Basic Installations	L1+L2+L5	\$ 51.92	\$ 52.47	N/A	\$ 54.16	\$ 54.16	\$ 54.16	
7	Disconnect Simple								
8	Installations-Including Disconnection	L6+L7	\$ 51.92	\$ 52.47	\$ -	\$ 54.16	\$ 54.16	\$ 54.16	\$ 55.27
Coordination and Testing									
9	Installation Dispatch-Testing	Rate Sheet	\$ 114.06	\$ 114.06		\$ 114.06	\$ 114.06	\$ 114.06	
Hot Cut Charges-Replace Basic Charge									
10	Provisioning	Rate Sheet			\$ 107.09				
11	Service Connection CO Wiring	Rate Sheet			\$ 69.44				
12	Basic Installation with Testing	L8 + L9	\$ 165.98	\$ 166.53	\$ -	\$ 168.22	\$ 168.22	\$ 168.22	\$ 142.10
13	Total Coordinated Installations	L5+L10+L11	Note (5)	Note (5)	\$ 188.73	Note (5)	Note (5)	Note (5)	\$ 59.81
14	Total Coordinated Cut with Testing Order		Note (5)	Note (5)	Note (1) & (2)	Note (5)	Note (5)	Note (5)	\$ 171.87
15	Total Coordinated Installations-Compromise (1)		N/A	N/A	\$ 35.00	N/A	N/A	N/A	N/A
16	Total Coordinated Cut w/ Testing Compromise		N/A	N/A	Note (1) & (2)	N/A	N/A	N/A	N/A

Note (1): Verizon agreed to a 3 year reduction in the hot cut rate to \$35 in their regulatory reform docket.

Note (2): Based on the declaration of Paul A Lacouture and Virginia P Ruesterholz the function performed for the \$35.00 rate are identical to the functions performed for the Coordinated Install without Testing rate of \$59.81 for Qwest.

Note (3): The hot cut rate does not apply to HDSL and ADSL compatible loops, 4 wire analog loops or new loop installations

Note (4): The hot cut rate only applies to the transfer of POTS services that are currently up and running (i.e. "hot").

Note (5): Qwest could not identify a separate charge for coordination. Rate appears to be the same as a basic installation with and without testing.

Based on Qwest interpretation of the rates in the other RBOCs published SGATs

[Redacted]

Corrected since original filing.

Qwest

Colorado Non-Recurring Rates Comparison (Loop Installation-First)-Verizon Page 2

Ln	Rate Element		2 Wire Analog Loop	New Jersey "Hot Cut" (3)	xDSL Compatible	2 Wire Analog Loop	xDSL Compatible	CO All Types
Nonrecurring Rate-First								
1	Installation without Premise Visit CCS Design per Order	Rate Sheet	\$ 23.15		\$ 44.02	\$ 3.01	\$ 3.01	
Service Order Charges								
2	Manual Intervention	Rate Sheet	\$ 15.02	\$ 15.02	\$ 15.53			
3	Mechanized	Rate Sheet	\$ 2.31	\$ 2.31	\$ 9.36	\$ 1.06	\$ 1.06	
4	Composite Assuming 12% Manual	L3 +L2*12%	\$ 4.11	\$ 4.11	\$ 11.22	\$ 1.06	\$ 1.06	
5	Access to Operational Support Systems	Rate Sheet			\$	\$ 3.35	\$ 3.35	
6	Total Basic Installations-No Premise Visit	L1+L4+L5	\$ 27.26	N/A	\$ 55.24	\$ 7.42	\$ 7.42	
7	Disconnect Simple	Rate Sheet				\$ 1.34	\$ 1.34	
8	Basic Installations with Disconnection-No Premise Visit	L6+L7	\$ 27.26	\$ -	\$ 55.24	\$ 8.76	\$ 8.76	\$ 55.27
9	Premise Visit	Rate Sheet	\$ 73.36	\$ 73.36	\$ 73.36	\$ 67.66	\$ 67.66	
10	Basic Installations with Premise Visit	L8+L9	\$ 100.62		\$ 128.60	\$ 76.42	\$ 76.42	\$ 55.27
Coordination and Testing								
11	Cooperative Testing-CO	Rate Sheet	\$ 1.60			Note (4)	\$ 31.72	
12	Cooperative Testing-Premise	Rate Sheet	\$ 30.12			Note (4)	\$ 31.72	
13	Coordinated Cutover - No Premise Visit						\$ 3.28	
14	Coordinated Cutover - Premise Visit						\$ 12.25	
Hot Cut Charges-Replace Basic Charge								
15	Installation	Rate Sheet		\$ 157.45				
16	Basic Installation with Testing	L.8 + L.11	\$ 28.86		\$ 55.24		\$ 40.48	\$ 142.10
17	Basic Installation with Testing-Customer Premise	L.10 + L.12	\$ 130.74		\$ 128.60		\$ 108.14	\$ 142.10
18	Coordinated Installations-NJ	L15+L4		\$ 161.56				
19	Coordinated Installations-No Premise Visit-PA	L13 + L8	Note (5)		Note (5)	Note (5)	\$ 12.04	\$ 59.81
20	Coordinated Installations-Premise Visit-PA	L10+L14					\$ 88.67	\$ 59.81
21	Total Coordinated Cut with Testing-No Premise Visit	L11 +L19	Note (5)	Note (2)	Note (5)	Note (5)	\$ 43.76	\$ 171.87
22	Total Coordinated Cut with Testing-Premise Visit	L14 +L12 +L10					\$ 120.39	\$ 171.87
23	Voluntary Reduction-Note (1) & (2)			\$35.00				
24	Total Coordinated Cut w/ Testing Compromise			Note (1) & (2)				

Note (1): Verizon agreed to voluntarily reduce their rate to \$35.

Note (2): Based on the declaration of Paul A Lacouture and Virginia P Ruesterholz the function performed for the \$35.00 rate are identical to the functions performed for the Coordinated Install without Testing rate of \$59.81 for Qwest.

Note (3): The hot cut rate does not apply to HDSL and ADSL compatible loops or 4 wire analog loops or new loop installations

Note (4): There is no Cooperative testing option under the Analog 2-Wire loop portion of the rate sheet

Note (5): Qwest could not identify a separate charge for coordination

Based on Qwest interpretation of the rates in the other RBOCs published SGATs

Corrected since original filing.

Qwest

Colorado Non-Recurring Rates Comparison (Loop Installation-First)-BLS

Ln	Rate Element	Louisiana						Georgia						CO	
		SL1	Analog SL2	4-Wire	ISDN	ADSL	HDSL	SL1	Analog SL2	4-Wire	ISDN	ADSL	HDSL		
Service Order Charge															
1	Mechanized-OSS	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	\$ 3.50	
2	Manual	\$ 15.20	\$ 15.20	\$ 15.20	\$ 15.20	\$ 15.20	\$ 15.20	\$ 18.94	\$ 18.94	\$ 18.94	\$ 18.94	\$ 18.94	\$ 18.94	\$ 18.94	
3	Percent Manual-Qwest Studies	12.00%	12.00%	12.00%	12.00%	12.00%	12.00%	12.00%	12.00%	12.00%	12.00%	12.00%	12.00%	12.00%	
4	Composite Service Order Charge	L2*L3+L1*(1-L3)	\$ 4.90	\$ 4.90	\$ 4.90	\$ 4.90	\$ 4.90	\$ 4.90	\$ 5.35	\$ 5.35	\$ 5.35	\$ 5.35	\$ 5.35	\$ 5.35	
Nonrecurring Rate-First															
5	Loop	\$ 36.54	\$ 102.10	\$ 127.40	\$ 113.34	\$ 117.08	\$ 125.50	\$ 42.54	\$ 104.17	\$ 206.95	\$ 233.38	\$ 44.69	\$ 44.69		
6	Total Basic Installations incld Disconnect	L5+L4	\$ 41.44	\$ 107.00	\$ 132.30	\$ 118.24	\$ 121.98	\$ 130.40	\$ 47.89	\$ 109.52	\$ 212.30	\$ 238.73	\$ 50.04	\$ 50.04	\$ 55.27
Coordination Charge															
8	Coordination Charge-Specific Time	\$ 17.56	\$ 17.56	\$ 17.56	\$ 17.56	\$ 17.56	\$ 17.56	\$ 35.74	\$ 35.74	\$ 35.74	\$ 35.74	\$ 35.74	\$ 35.74	\$ 35.74	
Time and Materials Charged for Coordination & Testing															
9	Basic Time-First Half Hour	\$ 33.17							\$ 78.92						
10	Basic Time-Each Additional Half Hour	\$ 19.28							\$ 23.33						
11	Basic Installation with Testing (1.5 Hours)	L6+L9+L10*2	\$ 113.17	Note (1)	\$ 173.47	Note (1)	Note (1)	Note (1)	Note (1)	Note (1)	\$ 142.10				
12	Total Coordinated Installations	L6+L8	\$ 59.00	\$ 124.56	\$ 149.86	\$ 135.80	\$ 139.54	\$ 147.96	\$ 83.63	\$ 145.26	\$ 248.04	\$ 274.47	\$ 85.78	\$ 85.78	\$ 59.81
13	Total Coordinated Cut with Testing (1.5 Hrs)	L12+L9+L10*2	\$ 130.73	Note (1)	\$ 209.21	Note (1)	Note (1)	Note (1)	Note (1)	Note (1)	\$ 171.87				

Note (1): The rate sheet does not designate whether there is a cooperative test option with this type of installation.

Based on Qwest interpretation of the rates in the other RBOCs published SGATs

Exhibits to Question #10