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September 9, 2002

Ex Parte **REDACTED - FOR PUBLIC  
INSPECTION**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., TW-B204  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Application of Qwest Communications International, Inc.  
To Provide In-Region InterLATA Services in the States of Colorado,  
Idaho, Iowa, Nebraska and North Dakota. WC Docket No. 02-148

Application of Qwest Communications International, Inc.  
To Provide In-Region InterLATA Services in the States of Montana,  
Utah, Washington & Wyoming. WC Docket No. 02-189

Dear Ms. Dortch:

Today Nancy Lubamersky, Andrew Crain, Michael Williams, Loretta Huff, Peter Rohrbach and the undersigned participated on behalf of Qwest in a conference call with John Stanley, Elizabeth Yockus, Gail Cohen, Marcy Greene, Pam Megna and Jon Minkoff of the Wireline Competition Bureau to discuss how UNE-P Star performance results are captured.

Qwest explained that whether submitting requests to convert Retail accounts to Resale or UNE-P<sup>1</sup>, the LSR process is very similar. Both requests would use the same LSR forms, including the Resale form, with all the same fields being populated such as customer name, address, telephone number and the differentiation between existing and new features.

When no changes are required, conversion from Retail to Resale can be submitted as "conversion as is". However, the use of conversion-as-is is extremely limited because it is common for features or PIC/LPICs to change at the time of conversion.

Because UNE-P services have a different class of service than their equivalent retail products, conversion-as-is from Retail to UNE-P is not available. To support the ease of conversion under the conversion-as-specified scenario, the IMA GUI provides a "recap"

<sup>1</sup> CLECs currently ordering UNE-Star use the interim process mirroring Resale. The long-term process, not implemented by either CLEC, follows the UNE-P process.

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function that provides all the features that exist on the account being converted.<sup>2</sup> Therefore, the level of effort difference between creating a conversion-as-is LSR versus a conversion-as-specified LSR is not significant.

Qwest highlighted the process by which the ROC Technical Advisory Group (TAG) approved PID changes to capture UNE-Star performance results in UNE-P categories as opposed to resale categories, and noted that the process history is detailed on pages 36-39 of Qwest's July 19, 2002 ex parte in this proceeding.

Qwest pointed out that the terms, conditions and rates for the UNE-Star products that Qwest has provided to CLECs are memorialized in amendments to CLEC interconnection agreements. These interconnection amendments were filed under Section 252 and approved by the commissions for each state currently subject to a Qwest Section 271 application.

Qwest also provided the following data:

- (1) Total UNE-P, UNE-P Star and traditional UNE-P volumes for the five ROC I states (attached).
- (2) For the CLECs discussed, of 7,867 completed LSRs converting from Retail (or possibly from another CLEC Resale) to UNE P-Star March-May 2002, 1.55% were converted as is. In March, 2.6% were converted as is, in April, 0.9% were converted as is and in May 1.6% were converted as is. All others were converted as specified.
- (3) Confidential PID results for January through June, 2002 with all CLECs' UNE-P (POTS) and UNE-P (CTX); McLeod's UNE-Star alone, Eschelon's UNE-Star alone and all CLECs excluding McLeod and Eschelon.

Separately, Qwest notified the Commission that it expects to fully automate its paper and electronic bill matching process by November 15, 2002. As explained in earlier filings in these dockets, Qwest uses the same CRIS data source to create both paper and electronic bills.<sup>3</sup> Qwest also employs as an additional safeguard a mechanized process to ensure that the bill totals on paper and electronic bills are the same.<sup>4</sup> If the electronic and paper bill totals do not match, Qwest's mechanized processes pull the electronic bill from distribution, and Qwest personnel then compare the electronic bill to the paper bill, correct

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<sup>2</sup> EDI CLECs, through pre-order/order integration, can develop equivalent functionality using the parsed CSR information Qwest makes available.

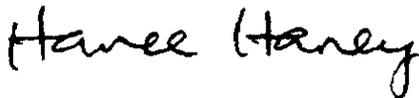
<sup>3</sup> See Qwest ROC I OSS Declaration at ¶ 500; Qwest ROC I OSS Reply Declaration at ¶ 191; Qwest ROC II OSS Declaration at ¶ 483, n.698; ROC II OSS Reply Declaration at ¶ 288.

<sup>4</sup> *Id.*

any discrepancies, and load the correct bill for electronic transmission to the CLEC.<sup>5</sup> Initially, Qwest expected this process to be supplanted by a fully automated system on September 9, 2002.<sup>6</sup> This fully automated system utilizes new technology that requires extensive validation before deployment. The nature and complexity of the enhancements to the EDI bill validation performed by Qwest requires Qwest to err on the side of caution to ensure quality and accuracy. A delay in its implementation therefore has arisen due to unforeseen difficulties in deploying a new data interchange format utilizing Extensible Markup Language (XML). As a result, the current mechanized processes will remain in place until it is supplanted by the fully automated system on November.

The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,



cc: M. Carowitz            P. Baker            J. Stanley  
E. Yockus                C. Post             S. Vick  
G. Remondino            P. Fahn             J. Orchard  
R. Harsch                B. Smith            C. Washburn  
J. Jewel                  J. Myles            S. Oxley

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<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

**UNE-P in service**

<b>Colorado</b>	<b>Feb-02</b>	<b>Mar-02</b>	<b>Apr-02</b>	<b>May-02</b>	<b>Jun-02</b>	<b>Jul-02</b>
Total UNE-P	79,268	79,406	78,749	82,350	81,527	84,780
UNE-P POTS STAR	21,480	21,688	21,020	20,462	19,029	15,891
UNE-P CENTREX STAR	53,191	52,328	50,899	50,796	45,426	42,717
UNE-P minus Star	<b>4,597</b>	<b>5,390</b>	<b>6,830</b>	<b>11,092</b>	<b>17,072</b>	<b>26,172</b>

<b>Idaho</b>	<b>Feb-02</b>	<b>Mar-02</b>	<b>Apr-02</b>	<b>May-02</b>	<b>Jun-02</b>	<b>Jul-02</b>
Total UNE-P	11,289	11,438	11,434	11,344	11,091	10,515
UNE-P POTS STAR	10,900	11,048	11,061	11,037	10,877	10,370
UNE-P CENTREX STAR	0	0	0	0	0	0
UNE-P minus Star	<b>389</b>	<b>390</b>	<b>373</b>	<b>307</b>	<b>214</b>	<b>145</b>

<b>Iowa</b>	<b>Feb-02</b>	<b>Mar-02</b>	<b>Apr-02</b>	<b>May-02</b>	<b>Jun-02</b>	<b>Jul-02</b>
Total UNE-P	111,175	110,471	107,373	105,243	103,018	98,878
UNE-P POTS STAR	130	130	117	118	118	116
UNE-P CENTREX STAR	109,741	108,796	105,667	103,347	100,857	96,549
UNE-P minus Star	<b>1,304</b>	<b>1,545</b>	<b>1,589</b>	<b>1,778</b>	<b>2,043</b>	<b>2,213</b>

<b>Nebraska</b>	<b>Feb-02</b>	<b>Mar-02</b>	<b>Apr-02</b>	<b>May-02</b>	<b>Jun-02</b>	<b>Jul-02</b>
Total UNE-P	3,552	4,446	4,298	4,378	4,087	4,055
UNE-P POTS STAR	1,278	1,283	1,256	1,223	1,069	1,043
UNE-P CENTREX STAR	0	0	0	0	0	0
UNE-P minus Star	<b>2,274</b>	<b>3,163</b>	<b>3,042</b>	<b>3,155</b>	<b>3,018</b>	<b>3,012</b>

<b>North Dakota</b>	<b>Feb-02</b>	<b>Mar-02</b>	<b>Apr-02</b>	<b>May-02</b>	<b>Jun-02</b>	<b>Jul-02</b>
Total UNE-P	21,784	21,149	20,787	20,380	20,191	20,078
UNE-P POTS STAR	21	19	21	20	19	23
UNE-P CENTREX STAR	19,281	18,575	18,038	17,529	17,188	16,884
UNE-P minus Star	<b>2,482</b>	<b>2,555</b>	<b>2,728</b>	<b>2,831</b>	<b>2,984</b>	<b>3,171</b>

<b>5 State Total</b>	<b>Feb-02</b>	<b>Mar-02</b>	<b>Apr-02</b>	<b>May-02</b>	<b>Jun-02</b>	<b>Jul-02</b>
Total UNE-P	227,068	226,910	222,641	223,695	219,914	218,306
UNE-P POTS STAR	33,809	34,168	33,475	32,860	31,112	27,443
UNE-P CENTREX STAR	182,213	179,699	174,604	171,672	163,471	156,150
UNE-P minus Star	<b>11,046</b>	<b>13,043</b>	<b>14,562</b>	<b>19,163</b>	<b>25,331</b>	<b>34,713</b>