

Qwest & Escheloo Meeting

IT issues relating to Eschelon UNE-E (UNE Star, UNE-P)

Held March 28, 2001

Action Items:

1. When will Eschelon be able to review the list of USOC's included in our UNE-E product? Kathy Rein planned to get the list to IT on Friday March 30<sup>th</sup> and Escheloo should receive it by April 20<sup>th</sup>, 2001. *Action: never receive list.*
2. Best case scenerio was that UNE-E would be implemented in IMA 7.01 and Eschelon would begin ordering resale products differently. *Action: Not clear what will happen with IMA 7.01 as it relates' to Eschelon ordering.*
3. Jeff Thompson to explain how **we** are going to track originating LD for UNE-E lines. *Qwest and Eschelon have agreed to engage in mutual audit with Price Waterhouse/Arthur Anderson - waiting for Audrey McKenney to execute.*
4. Escheloo needs to know how to do an audit of the local MOU or 525 minutes per line. *Qwest and Eschelon have agreed to engage in mutual audit with Price Waterhouse/Arthur Anderson - waiting for Audrey McKenney to execute.*
5. Kathy Rein to provide a flow chart of the ordering activity for UNE-E. *No word on this yet.*

Kathy Rein to check on why Eschelon does not receive complete completion report information. *Action: No word on this yet.*

-----Original Message-----

From: Clauson, Karen L.  
sent: Wednesday, May 23, 2001 6:54 PM  
To: 'Mark Routh': 'ppennin@uswest.com'; 'krein@Qwest.com'; 'jltthomp@uswest.com'; Powers, F. Lynne  
Subject: IT call today/summary

Here is a summary from today's call. Please let me know if I have inadvertently misstated anything. Also, please pass along to Dennis. I do not have his email address. Thanks.

Qwest Participants: Mark Routh, Jeff Thompson, Dennis M., Freddi Pennington. Kathy Rein  
Eschelon Participants: Lynne Powers, Karen Clauson

*Cutover Issues:* Lynne said that we lost 30 cuts today due to Qwest's ASMS system, which connects to SPAC, being down. Denver knew about the problem, but Omaha did not and went ahead. Lynne said that this happens at least one day a month and is costing us customers.

*Action Items* from March 28, 2001 meeting:

1. **When** will Eschelon be able to review the list of USOC's included in our UNE-E product? Kathy Rein planed to get the list to IT on Friday March 30<sup>th</sup> and Eschelon should receive it by April 20<sup>th</sup>, 2001. Action: never received list.

Kathy Rein said that she has the list. Freddi and Kathy indicated that some of the USOCs will be the same as those currently used for resale orders and others will be new for "UNE-STAR." Kathy said that the list will be a complete list of the USOCs for UNE-E. Action: Kathy agreed to provide the USOC list to Lynne and Karen by COB on May 24, 2001.

2. Best case scenerio was that UNE-E would be implemented in IMA 7.01 and Eschelon would begin ordering resale products differently. Action: Not clear what will happen with IMA 7.01 as it relates to Eschelon ordering.

Jeff asked about "UNE-E." Kathy and Freddi indicated that Qwest considers UNE-E and UNE-STAR as the same thing. Jeff said that Eschelon should wait to implement UNE-E until Qwest changes its back end legacy systems to bill for UNE-STAR (rather than changing ordering when 7.01 is released). Lynne indicated that we need notice of when that will happen and training before it is implemented. Eschelon clarified that when the parties use the term-"embedded base," they are referring to Eschelon's customers/lines before the move to ordering UNE-E (after the back end legacy systems can bill for UNE-E). Therefore, the longer it takes to start using the new ordering procedures, the longer/larger the embedded base will be, 'Freddie said that is Qwest's understanding as well. Action: Freddi agreed to provide a schedule of the dates for implementation of CRIS billing, IMA, conversion from resale to UNE-STAR (when base is converted to ZSID). availability of documentation on products and

ordering, and availability of training on products and ordering by COB on May 25, 2001.

Eschelon indicated that Qwest's comments regarding the availability of web-based training, UNE-E and UNE-STAR being the same, etc., suggested that the release notices, product information, and training would be the same for Eschelon as for other CLECs. Eschelon asked whether there would be any issues unique to Eschelon/UNE-E. Action: Jeff agreed to send Lynne and Karen an email, after talking with Sue McNae, as to whether training and information will be the same or different in some respects for UNE-E.

3. Jeff Thompson to explain how we are going to track originating LD for UNE-E lines. Qwest and Eschelon have agreed to engage in mutual audit with Price *Waterhouse/Arthur* Anderson - waiting for Audrey McKenney to execute.. Issue for Audrey McKenney/not this call.

4. Eschelon needs to know how to do, an audit of the local MOU or 525 minutes per line. Qwest and Eschelon have agreed to engage in mutual audit with Price *Waterhouse/Arthur* Anderson - waiting for Audrey McKenney to execute. Issue for Audrey McKenney/not this call.

5. Kathy Rein to provide a flow chart of the ordering activity for UNE-E. *No word on this yet.* Kathy forwarded a flow chart to Lynne and Kacen after the call.'

6. Kathy Rein to check on *why* Eschelon does not receive complete completion report information. Action: *No word on this yet.*

Kathy said that Qwest is currently experiencing trouble with Centrex that involves the difference in using telephone and station numbers. Qwest is working on it. Jeff said that the changes will be part of the changes made to the legacy systems

With respect to Eschelon's pending CR on clarity and completeness of loss and completion reports, Jeff said that Qwest will need to confirm whether changes made will be made as to UNE-STAR. Lynne said that she will get more information about the issues we are having and work with Steve (account rep) to resolve them.

#### *Additional Issues/Follow Up to Previous Discussions on Embedded Base:*

Eschelon observed that the information provided today, such as changing the RSID to ZSID, etc., seems to assume actions being taken as to the embedded base. Rick Smith, from his discussions with Audrey McKenney, however, has an understanding that the base will not be "touched," particularly in the sense that Eschelon's customers will not be adversely affected. Freddi said that, to provide switched access to Eschelon, Qwest will make some actual changes. She said that, rather than Eschelon submitting LSRs for each order in

the embedded base to make these changes, Qwest is developing a tool to do the work on its side, Lynne referred to her previous letter to Audrey on this issue in which Eschelon discussed the need to ensure that Eschelon's customers aren't affected when Qwest does so. For example, we had previously discussed whether feature packages would convert and, if not, ensuring that customers didn't lose features or service as a result. Kathy said that all feature packages will convert from resale to UNE-STAR in tact. Kathy said that only some line USOCs and packages associated with USOCs such as Custom Choice will not. Lynne asked for a written explanation as to what changes are being made and how Qwest will ensure that Eschelon's customers don't suffer. Lynne said that Qwest needs to have some skin in the game to ensure that this goes smoothly. Jeff said that he can describe the changes but that Audrey would need to deal with the economic consequences of things not going smoothly. Eschelon asked that Jeff provide enough detail that the issues would be clear to Audrey and Rick and so that Eschelon can estimate the number of Eschelon customers that the non-billing only changes may involve.

Action: Jeff agreed to provide a written description of the two types of activities/results that will occur: (1) changes to billing systems only, where no information flows to the switch and thus customers are not affected; and (2) changes that are not to billing systems only, so data will flow to the switch, and changes will be made to customer's lines/service, by COB on June 1st.

**Karen L. Clauson**  
Director of Interconnection  
Eschelon Telecom, Inc.  
730 2nd Ave. South, Suite 1200  
Minneapolis, MN 55402  
Phone: 612-436-6026  
Fax: 612-436-6126



RESPONSE TO SPECIFIC FACTUAL ALLEGATIONS

THE ESCHELON AGREEMENTS

A *The UNE Star Platform*

7. Eschelon and McLeodUSA are the only two CLECs that operate in Minnesota that have selected an unbundled network element platform called UNE Star (also known as "UNE-E" when provided to Eschelon, and "UNE-M" when provided to McLeodUSA). Qwest provided this platform because, among other things, these wholesale customers wanted to receive a weighted average rate for UNE-P elements for their business customers, and flat-rate tiered pricing for certain interconnection usage elements, and were willing to pay for these selected features at the rates negotiated in interconnection agreements subsequently approved by this Commission.

8. Qwest offered the UNE Star platform to CLECs at a price and on terms that reflected the costs associated with developing, implementing, and providing the platform. Qwest also required CLECs wishing to purchase the UNE Star platform to make total and annual minimum purchase commitments over a multi-year minimum term; it imposed a significant penalty if the CLEC did not meet those minimum commitments; it required "Bill and Keep" for reciprocal compensation, including internet-bound traffic ("ISP traffic"); it required a one-time, lump sum conversion charge to convert the embedded base; it restricted the offering to business customers; and it required updated forecasts by the CLECs for purposes of adjusting price points to be in alignment with ordered rates.

9. Eschelon agreed to purchase the UNE Star platform by an agreement dated November 15, 2000. In this agreement, Eschelon agreed to purchase a minimum of \$150,000,000 in Qwest telecommunications products over five years, to pay Qwest \$10,000,000

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this \_\_\_ day of March 2002, a true and correct copy of Qwest's Answer was served, by U.S. mail and hand delivery, on

QWEST CORPORATION

---

Jason D. Topp  
200 South Fifth Street, Room 395  
Minneapolis, Minnesota 55402

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STATE OF MINNESOTA  
OFFICE OF ADMINISTRATIVE HEARINGS

PUC DOCKET NO: P-421/CF-01-1375  
OAH DOCKET NO: 12-2300-14490-2  
In the Matter of the Commission's Review and  
Investigation of Qwest's Unbundled Network Elements  
(UNE) Prices.

Minnesota Public Utilities Commission  
Suite 350, Metro Square Building  
121 Seventh Place East  
St. Paul, Minnesota

Rec. pursuant to Notice, at 9:00 in the  
morning on May 21, 2002.

BEFORE: Judge Steve Mihalchick  
REPORTER: Janet Shaddix Elling, RPR

1 APPEARANCES: (Continued)  
2 LESLEY JAMES GERR, Senior Attorney,  
3 538 Summit Avenue, St. Paul, Minnesota 55105,  
4 appeared for and on behalf of WorldCom.  
5 GREG MERZ, Attorney at Law,  
6 Gray, Blanc, Moody, Moody & Bennett, 1400 City  
7 Center, 11 South Sixth Street, Minneapolis,  
8 Minnesota, 55402, appeared for and on behalf of  
9 AT&T and WorldCom.  
10 JOY GULLIKSON, Director of External  
11 Affairs, 10405 Sixth Avenue North, Plymouth,  
12 Minnesota, 55441, appeared for and on behalf of  
13 Onvoy.  
14 J. JEFFREY OXLEY, Attorney at Law,  
15 730 Second Avenue South, Suite 1200, Minneapolis,  
16 Minnesota 55402, appeared for and on behalf of  
17 Eschelon Telecom, Inc.

COMMISSION STAFF:  
Marc Fournier

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APPEARANCES:

JASON TOPP, Attorney at Law, Qwest  
Corporation, 200 South Sixth Street, Room 393,  
Minneapolis, Minnesota, 55402, and JOHN DEWANEY,  
Attorney at Law, and KELLY CAMERON, Attorney at  
Law, Becklin Cole, 607 14th Street N.W.,  
Washington, D.C., 20005, appeared for and on  
behalf of Qwest Corporation.

LINDA JENSEN, Assistant Attorney  
General, 525 Park Street, Suite 200, St. Paul,  
Minnesota 55101-2106, appeared for and on behalf  
of the Department of Commerce.

K. MEGAN DOBERNECK, Attorney at Law,  
7901 Lowry Boulevard, Denver, Colorado, 80230,  
appeared for and on behalf of Covad  
Communications.

DAN LIPSCHULTZ, Attorney at Law,  
400 South Highway 139, Suite 750, Minneapolis,  
Minnesota 55426, appeared for and on behalf of  
McLeod USA.

MICHAEL BRADLEY, Attorney at Law,  
and CECILIA RAY, Attorney at Law, Moss & Barnett,  
90 South Seventh Street, Suite 1800, Minneapolis,  
Minnesota 55402, appeared for and on behalf of the

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Q If Qwest, and the CLEC in this circumstance that I'm talking about, have a bill and keep arrangement for local traffic, would any SS7 charges be assessed by Qwest?

A Yes. SS7 charges are still assessed. If they have a bill and keep arrangement that's just for reciprocal compensation.

Q I believe you stated in response to a question by Ms. Gullikson that the SS7 charges apply to all calls, not just local calls; do you recall saying that?

A I do, yes.

Q I think you also said that long-distance SS7-related charges were charged under the FCC tariff?

A I just really speculated, I don't really know that for a fact. Ms. Gullikson asked me the question, what the tariff, how the tariff differed from the charges we were asking here, and I really probably responded when I shouldn't have because I do not know.

Q In the cost study that you submitted to support the SS7 charges, how did the cost study deal with the issue of local versus long-distance SS7 calls?

A I'm not the cost witness and I do not know the answer to that. Mr. Brigham probably could have responded to that question.

Q Isn't your name listed as the witness by 9.14, common channel signaling/SS7 charges?

A Yes, it is, and the purpose of that is to let you know what products I discuss. But I don't have anything to do with the cost studies, the analysis of the costs, how the pricing is done, anything related to that at all.

Q Okay, I'm not saying that you should, I'm just saying that's what I was thinking when I looked at the chart there. Well, let me ask you this, if you know, do you think it would be relevant in determining the appropriate SS7 charges, if any, for local traffic, that cost recovery of SS7 for long-distance calls be dealt with?

A I don't know.

Q Okay, I believe yesterday Mr. Bradley discussed, I think he called them AN features, and then defined it as artificial intelligence something. I would like to ask if you're familiar with AN as advanced intelligent network features?

A I've heard of the product, yes.

1 provided to CLECs like Eschelon and McLeod under  
2 their UNE-Star or UNE-E agreements? ONE-M would  
3 be for McLeod, but as I understand it, UNE-Star,  
4 UNE-E, UNE-M, all refer to exactly the same  
5 thing.

6 A And I'm not familiar with those agreements.

7 Q Does Qwest anticipate providing any CLECs with  
8 access to AN Features when they purchase  
9 unbundled switching from Qwest?

10 A My understanding is that at this point in time we  
11 haven't had any real requests for the service. We  
12 would provide the platform to the AN, but not  
13 anything more than the platform.

14 Q You discuss the availability of a number of UNE  
15 platform products, correct?

16 A Yes.

17 Q And in that listing of products I didn't see  
18 WE-Star or UNE-E or UNE-M; is that correct?

19 A That's correct.

20 Q Is it Qwest's position that UNE-Star, UNE-E or  
21 UNE-M are not available to other CLECs?

22 A Those are -- I thought you said those were  
23 agreements. What I'm describing in the UNE-P is  
24 the products that Qwest offers. And I don't --  
25 those products are probably encompassed somewhere

1 in those agreements, but we would not refer in our  
2 product offering to any company specifically.

3 Q Do you understand that Qwest has an obligation to  
4 provide element combinations to CLECs upon  
5 request?

6 A Yes, I do.

7 Q And your testimony, correct me if I'm  
8 misinterpreting it, but did you testify that if a  
9 CLEC wanted a combination other than the standard  
10 products that you listed in your testimony, the  
11 CLEC had to submit a bona fide request to Qwest?

12 A That's correct. We have a list of just generic  
13 standard offerings that we do for ONE  
14 combinations. If there's something outside of our  
15 current list, the CLEC is asked to submit a  
16 request, and we'll be more than happy to review  
17 it.

18 Q So I understand you to be saying that if a CLEC  
19 wanted UNE-Star, they would get that by submitting  
20 a BFR to Qwest?

21 A I wouldn't think so, because I'm not familiar with  
22 this agreement that you're talking to -- talking  
about, but we don't have a product anywhere called  
UNE-Star. If that's an agreement with a company,

1 offering that that company has as a combination,  
2 anybody would be entitled to that same  
3 combination. They wouldn't -- if it's already  
4 been offered as a combinahon, you wouldn't have  
5 to submit a special request for it. But you're  
6 never going to see any offering for like a  
7 UNE-Star if that's the name of an agreement. It's  
8 not the name of one of our products.

9 MR. OXLEY: Just one second, I may be  
10 done.

11 JUDGE MIHALCHICK: Sure.

12 MR. OXLEY: Thank you.

13 THE WITNESS: You're welcome.

14 JUDGE MIHALCHICK: Let's recess until  
15 1:00.

16 (Lunch break.)

17 JUDGE MIHALCHICK: Back on the record.  
18 We discussed the briefing schedule, the parties  
19 briefs will be due June 21, and reply briefs,  
20 June 28.

21 MR. OXLEY: Judge, are you going to set  
22 a page limit or anything like that?

23 JUDGE MIHALCHICK: I've never done that,  
24 but it sure sounds like a good idea. You ought to  
25 be able to do it in 50 pages. And reply briefs

1 JUDGE MIHALCHICK: Okay. Back on the  
2 record. Ms. Jensen?

3 MS. IENSEN: Thank you, Your Honor.

4 CROSS-EXAMINATION

5 BY MS. IENSEN:

6 Q Hello, Ms. Malone.

7 A Good afternoon.

8 Q I have just a few questions left for you since  
9 you've answered most of them already.

10 A Well, good.

11 Q Can you tell me how does -- or do you know how  
12 Qwest proposes that a CLEC provide power to its  
13 equipment at a DA hotel?

14 A No, I don't know.

15 Q Do you know even whether that's included in a UN  
16 or is it a stand-alone or separate UNE?

17 A I know that in the costs here that the access to  
18 the power is included in the cost, but exactly how  
19 that access is acquired. I don't know.

20 Q Okay. I'd like to direct you to, and again I  
21 apologize, my materials are also not paginated,  
22 but it is what I believe is page 5 of your March  
23 18, the direct testimony. I'm sorry -- yes. At  
24 lines 4 to 5.

25 A If you'd just direct me to the question?

1 should just address -- should really be a reply  
2 and ought to be more in the 20-page area, 15- to  
3 20-page area.

4 MS. IENSEN: Your Honor, had you  
5 intended to address the OS and DA questions that  
6 were deferred?

7 MR. MERZ: We have to talk about a  
8 schedule for addressing those remaining issues,  
9 both the OS and DA and CNAM bulk download.

10 JUDGE MIHALCHICK: Right. So have you  
11 got any thoughts?

12 MR. DEVANEY: Judge, can I go back to  
13 address the page number on the reply brief? At  
14 the risk of sounding like I'm lying, we have to  
15 respond to a number of parties in our reply brief,  
16 whereas typically the other parties are just  
17 responding to us. I'm wondering if we could have,  
18 instead of 15, say 20 to 25? It would be  
19 difficult I think for us to reply --

20 JUDGE MIHALCHICK: Actually, that sounds  
21 faint to me, I guess.

22 MR. DEVANEY: Thanks.

23 JUDGE MIHALCHICK: 25 is your  
24 Office record

1 Q This is section 4, called remote collocation, the  
2 question reads, "Please describe remote terminal  
3 collocation." The answer to that question, or  
4 instruction reads, in part, the last sentence,  
5 "The space includes access to AC/DC power, heat  
6 dissipation and access to feeder distribution  
7 interface terminations"; do you see that?

8 A Yes, I do.

9 Q When you made reference to AC/DC power, can you  
10 describe -- I'll use this as a for example, do you  
11 know how many amps would be provided for, say, a  
12 48 volt DC power?

13 A No, I don't. Those would really be more technical  
14 type aspects of the product.

15 Q Okay, When you made reference to the space  
16 including access to AC/DC power, what did you mean  
17 by access?

18 A The way I assume the rate element operates is that  
19 the power is there, and in that charge you are  
20 paying for the access to the power.

21 Q Whatever power needs those might be?

22 A That's correct.

23 Q And I have just one other area, I'd like to direct  
24 you to an area that was inquired into earlier, I





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3

4                           I.       IDENTIFICATION OF WITNESS

5 Q. PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND CURRENT  
6 POSITION.

7 A. My name is Kathryn Malone. I am employed by Qwest as a Manager –Wholesale  
8 Markets. My business address is 1801 California Street, Suite 2360, Denver, Colorado,  
9 80202.

10 Q. PLEASE STATE YOUR WORK EXPERIENCE AND PRESENT  
11 RESPONSIBILITIES.

12 A. I began my career with Qwest (formerly U S WEST) in 1964 in the Denver Operator  
13 Services Department. In 1968, I joined the Network Facilities Department as a  
14 technical assistant. From 1968 to 1978, I held various positions that, involved  
15 responsibility for coordination and design of Outside Plant Facilities.. In 1978, I was  
16 promoted to Budget Manager and was responsible for preparation and forecasting of  
17 both the construction and maintenance budgets in Arizona, Colorado, Montana and  
18 Wyoming.

19 In May 1984, after the divestiture of the Bell System, I accepted a position in the  
20 Revenue Requirements Department In that capacity, I was responsible for cost

1 settlements with local exchange carriers. My responsibilities included analysis of cost  
2 separation studies. In January 1990, I was promoted to Senior Access Manager and had  
3 responsibility for developing and negotiating contractual arrangements for toll access  
4 compensation with local exchange carriers. I accepted my current position as Manager  
5 -Wholesale Markets in 1998 and am responsible for Wholesale advocacy surrounding  
6 interconnection and resale of products and services.

7 II. PURPOSE

8 Q. DOES THIS TESTIMONY REPLACE THE DIRECT TESTIMONY YOU  
9 FILED IN THIS PROCEEDING ON DECEMBER 14, 2001?

10 A. Yes

11 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

12 A. My testimony describes various services that Qwest provides to Competitive Local  
13 Exchange Carriers (CLECs). I will describe and define the applicable elements for  
14 Customer Transfer Charge (CTC), Shared Transport, Local Tandem Switching, Local  
15 Switching, Customized Routing, Common Channel Signaling/SS7, 8XX Optional  
16 Features, UNE Combinations, Unbundled Packet Switching, Local Number Portability,  
17 Directory Assistance, Directory Assistance List Information, Toll and Assistance  
18 Operator Services and Operational Support Systems (OSS). My descriptions include  
19 the pricing structures for these elements, which include recurring and nonrecurring

1 charges, as appropriate Charges associated with each service addressed in my  
2 testimony are listed in Exhibit RHB-1, which is attached to the testimony of Mr Robert  
3 Brigham It is not the purpose of my testimony to analyze or determine the amount of  
4 the rates listed in RHB-1

5 III. CUSTOMER TRANSFER CHARGE (CTC)

6 Q. WHAT IS QWEST'S PROPOSAL FOR APPLICATION-OF THE CUSTOMER  
7 TRANSFER CHARGE?

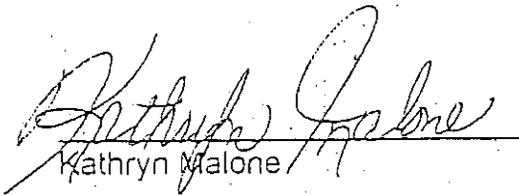
8 A. The Customer Transfer Charge (CTC) will apply when an end-user customer's Private  
9 Line Transport Service, or Advanced Communication Service is transferred from Qwest  
10 to a CLEC on a resold basis. A separate nonrecurring CTC is applicable for each  
11 Qwest account transferred to a reseller or each account transferred between resellers.  
12 The nonrecurring charge applicable to these services is listed in Exhibit RHB-1 of Mr.  
13 Brigham's testimony.

14 Q. PLEASE DEFINE "ADVANCED COMMUNICATIONS SERVICES."

15 A. Advanced Communications Services include Frame Relay, ATM Cell Relay and  
16 Transparent LAN Service.'

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief

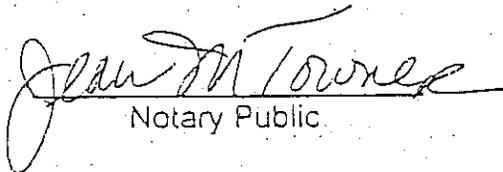
Executed on this 14th day of March, 2002

  
Kathryn Malone

STATE OF COLORADO

COUNTY OF DENVER

Subscribed and sworn to before me this 14<sup>th</sup> day of MARCH, 2002

  
Notary Public

Jean M. Towne  
My Commission Expires  
April 13, 2002

- DSL
- WIRELESS
- INTERNET
- QWESTOEX
- SEARCH



# Wholesale

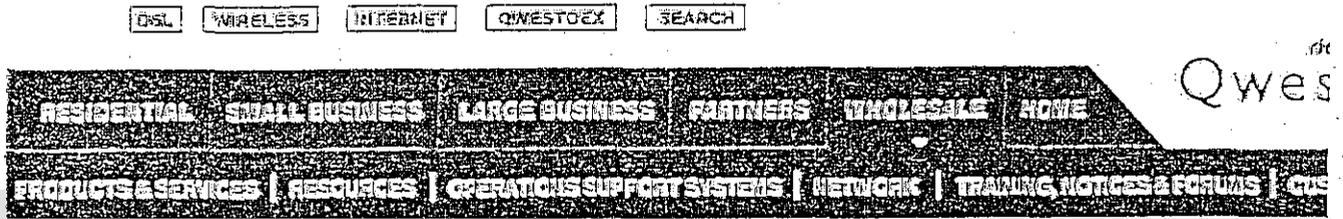
<ul style="list-style-type: none"> <li>Products &amp; Services</li> <li>Product Catalog (PCAT)</li> <li>› Product Description</li> <li>› Pricing</li> <li>› Features/Benefits</li> <li>› Applications</li> <li>› Implementation                             <ul style="list-style-type: none"> <li>› Pre Ordering</li> <li>› Ordering</li> <li>› Provisioning</li> <li>› Maintenance</li> <li>› Billing</li> <li>› Training</li> </ul> </li> <li>› Contacts</li> <li>› FAQs</li> </ul>	<p>Product Catalog (PCAT)</p> <p>Unbundled Network Elements - Platform (UNE-P) General Information - V9.0</p> <p>History Log</p> <p><b>Product Description</b></p> <p>Qwest Unbundled Network Elements-Platform (UNE-P) services are combinations of Unbundled Network Elements (UNEs) provided to end-users on behalf of Competitive Local Exchange Carriers (CLECs) that are functionally equivalent to Qwest's comparable retail service offerings. This product catalog (PCAT) contains general informatron about the UNE-P product family. For specific information on a UNE-P product, refer to that individual product PCAT.</p> <p>UNE-P products are intended for end-user applications, and may not be ordered for your own use. The UNE-P product family includes:</p> <ul style="list-style-type: none"> <li>• UNE-P Centrex - Centrex Plus, Centrex 21, and Centron™</li> <li>• UNE-P Digital Switched Service (DSS)</li> <li>• UNE-P Integrated Services Digital Network (ISDN) Basic Rate interface (BRI)</li> <li>• UNE-P Integrated Services Digital Network (ISDN) Primary Rate Interface (PRI)</li> <li>• UNE-P Private Branch Exchange (PBX)</li> <li>• UNE-P Plain Old Telephone Service (POTS)</li> <li>• UNE-P Public Access Line (PAL)</li> </ul>
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Qwest is available, on behalf of CLECS, for selection as a Local Primary Interexchange Carrier (LPIC) providing intra Local Access and Transport Area (intraLATA) toll service with UNE-P products in all states. When Qwest is selected as the LPIC, Qwest will not maintain a direct relationship with your end-user and you will be billed for *your* end user's intraLATA usage at the wholesale discount rate. IntraLATA toll calling plans are not available with UNE-P. Qwest IntraLATA Calling Cards will be cancelled when you convert existing service to UNE-P service.

**Availability**  
 You may request installation of new UNE-P service or convert existing Qwest retail or resale services to UNE-P services.

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UNE-P products are available throughout Qwest's 14-state local service territory. Check state specific Statements of Generally Available Terms



# Wholesale

<p>Products &amp; Services</p> <p>Product Catalog (PCAT)</p> <p>Product Catalog (PCAT)</p> <ul style="list-style-type: none"> <li>&gt; Product Description</li> <li>&gt; Pricing</li> <li>&gt; Features/Benefits</li> <li>&gt; applications</li> <li>&gt; Implementation             <ul style="list-style-type: none"> <li>&gt; Pre Ordering</li> <li>&gt; Ordering</li> <li>&gt; Provisioning</li> <li>&gt; Maintenance</li> <li>&gt; Billing</li> <li>&gt; Training</li> </ul> </li> <li>&gt; Contacts</li> <li>&gt; FAQs</li> </ul>	<p>Product Catalog (PCAT)</p> <p><b>Unbundled Network Elements - Platform (UNE-P) - Centrex - V5.0</b></p> <p>History Log</p> <p><b>Product Description</b></p> <p>Qwest Unbundled Network Elements-Platform (UNE-P) services are combinations of Unbundled Network Elements (UNEs) that provide Finished services to Competitive Local Exchange Carriers (CLECs) that are functionally equivalent to Qwest's comparable retail service offerings. General information about UNE-P can be found in the Unbundled Network Elements-Platform (UNE-P) General Information Product Catalog (PCAT)..</p> <p>Qwest provides UNE-P Centrex combinations as a finished service to end-users on behalf of UNE-P CLECs. Providing similar Finished service functionality as is provided with Qwest's retail service offerings, UNE-P Centrex provides exchange service between an end-user's premises and the Qwest Central Office (CO). UNE-P Centrex products available are UNE-P Centrex 21, UNE-P Centrex Plus, and UNE-P Centron** which may be ordered as a new combination or converted from existing Qwest resale or retail services.</p>
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UNE-P Centrex is comprised of the combination of the following UNES:

UNE-P Centrex 21:

- 2-Wire Analog (Voice Grade) Loop
- Analog Line Side Port
- Shared Transport Originating Minutes of Use (MOU)
  - Local Switching Originating MOU
  - Optional Features

UNE-P Centrex Plus and UNE-P Centron\*\*:

- 2-Wire Analog (Voice Grade) LOOP
- Analog Line Side Port
- Shared Transport Originating MOU
- Local Switching Originating MOU
- Optional Features
- Common Block
- Network Access Registers (NARs)

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UNE-P Centrex Plus and UNE-P Centron™ are available depending on the facilities and generic feature programs in the CO switches. UNE-P Centrex Plus and UNE-P Centron™ are grandparented and are not available for new installations in some states. To determine state availability refer to the state specific Tariffs/Catalogs/Price Lists.

UNE-P Centrex 21 is furnished only from a suitably equipped digital CO and is offered subject to availability of facilities and applicable generic feature programs. It is not available in a 2BESS CO.

#### Terms and Conditions

Existing resale or Qwest retail services that are grandparented are not available for conversion to UNE-P Centrex service. Any grandparented products and features will be removed from services that are being converted to UNE-P Centrex.

You may order new UNE-P Centrex service or convert existing retail or resale Centrex service to UNE-P Centrex service. Integrated Services Digital Network (ISDN) service is not offered with UNE-P Centrex.

Each UNE-P Centrex must carry Primary [nterexchange Carrier (PIC) and Local Primary [nterexchange Carrier (LPIC) information. More information about selecting a long distance carrier can be found in the Long Distance Carrier Selection Overview.

All UNE-P Centrex Plus and UNE-P Centron™ station lines must be associated with the main switching equipment. A UNE-P Centrex Plus or UNE-P Centron™ system may be either blocked or non-blocked; but it cannot be mixed. Combined station lines terminating at different locations into a single system must be served by the same CD.

It is your responsibility to provide Qwest with accurate end-user location information. For state regulated emergency reasons. Guidelines on how to update the Enhanced 911 (E911) are located in the Access to Emergency Services (911/E911) PCAT.

You may convert existing Qwest retail or resale service with existing Qwest Digital Subscriber Line (DSL)™ to UNE-P Centrex with Qwest OSL™ service. You may also request the installation of new Qwest DSL™ service on an eligible and existing UNE-P Centrex, subject to loop qualification and availability.

Your [nterconnection Agreement must include terms and conditions for purchase of Qwest DSL™ service with UNE-P Centrex. You should contact your Qwest Sales Executive or Qwest Service Manager for additional information or to begin the [nterconnection Agreement process.

For alternative data service arrangements and information with UNE-P Centrex, see the information on Line Splitting.

Once a service has converted to UNE-P Centrex with Qwest DSL™ service, existing and installed Customer Premise Equipment (CPE) (e.g., modems and Filters) will not be maintained or changed by Qwest. For new Qwest DSL™ service with UNE-P Centrex, it is your responsibility to provide your end-users with CPE, CPE installation instructions, and technical support. Additional terms and conditions, rates, and charges can be found for each state in the Tariffs/Catalogs/Price Lists.

MINNESOTA COMMUNITY INVESTMENT FUND - NO DISCOUNTS

Business									
Date	CLEC Num	CLEC Den	CLEC Res	CLEC Sid	Qvest Num	Qvest Den	Qvest Res	Mod Z Scr	Parity Scr
Oct-00			98.36%	12.70%				0.16	-0.9
Nov-00			100.00%	0.00%				-0.75	-1.46
Dec-00			98.21%	13.24%				3.34	1.03
Jan-01			97.62%	15.25%				0.82	-0.5
Feb-01			96.20%	19.11%				2.14	0.3
Mar-01			99.08%	9.53%				0.29	-0.82
Apr-01			100.00%	0.00%				-0.74	-1.45
May-01			99.20%	8.91%				0.21	-0.87
Jun-01			100.00%	0.00%				-0.7	-1.42
Jul-01			100.00%	0.00%				-0.61	-1.37
Aug-01			100.00%	0.00%				-0.77	-1.47
Sep-01			100.00%	0.00%				0.75	-1.46

Business									
Date	CLEC Num	CLEC Den	CLEC Res	CLEC Sid	Qvest Num	Qvest Den	Qvest Res	Mod Z Scr	Parity Scr
Nov-00			100.00%	0.00%				-0.75	-1.46
Dec-00			98.21%	13.24%				3.34	1.03
Jan-01									
Feb-01									
Mar-01									
Apr-01									
May-01									
Jun-01									
Jul-01									
Aug-01									
Sep-01									
Oct-01									

Center 21									
Date	CLEC Num	CLEC Den	CLEC Res	CLEC Sid	Qvest Num	Qvest Den	Qvest Res	Mod Z Scr	Parity Scr
Oct-00			98.70%	11.32%				-0.53	-1.37
Nov-00			100.00%	0.00%				-0.82	-1.5
Dec-00			99.10%	9.43%				-0.44	-1.27
Jan-01			98.36%	12.70%				0.6	-0.64
Feb-01			98.85%	10.66%				0.07	-0.96
Mar-01			100.00%	0.00%				-0.72	-1.44
Apr-01			100.00%	0.00%				-0.73	-1.44
May-01			100.00%	0.00%				-0.33	-1.2
Jun-01			100.00%	0.00%				-0.4	-1.24
Jul-01			100.00%	0.00%				-0.55	-1.34
Aug-01			95.65%	20.39%				0.45	-0.77
Sep-01			100.00%	0.00%				-0.79	-1.18

Center 21									
Date	CLEC Num	CLEC Den	CLEC Res	CLEC Sid	Qvest Num	Qvest Den	Qvest Res	Mod Z Scr	Parity Scr
Nov-00			100.00%	0.00%				-0.82	-1.5
Dec-00			98.10%	9.43%				-0.44	-1.27
Jan-01									
Feb-01									
Mar-01									
Apr-01									
May-01									
Jun-01									
Jul-01									
Aug-01									
Sep-01									
Oct-01									

UNE - P (POIS)									
Date	CLEC Num	CLEC Den	CLEC Res	CLEC Sid	Qvest Num	Qvest Den	Qvest Res	Mod Z Scr	Parity Scr
Oct-00			100.00%	0.00%				-0.26	-1.16
Nov-00			100.00%	0.00%				-0.07	-1.04
Dec-00			100.00%	0.00%				-0.12	-1.07
Jan-01			100.00%	0.00%				-0.05	-1.03
Feb-01			100.00%	0.00%				-0.08	-1.03
Mar-01			100.00%	0.00%				-0.08	-1.05
Apr-01			100.00%	0.00%				-0.05	-1.03
May-01			100.00%	0.00%				-0.05	-1.03
Jun-01			100.00%	0.00%				-0.05	-1.03
Jul-01			100.00%	0.00%				-0.18	-1.11
Aug-01			100.00%	0.00%					
Sep-01			100.00%	0.00%					

UNE - P (POIS)									
Date	CLEC Num	CLEC Den	CLEC Res	CLEC Sid	Qvest Num	Qvest Den	Qvest Res	Mod Z Scr	Parity Scr
Nov-00			100.00%	0.00%				-0.07	-1.04
Dec-00			100.00%	0.00%				-0.12	-1.07
Jan-01			13.73%	13.73%				2.33	0.42
Feb-01			15.11%	15.11%				3.81	1.35
Mar-01			7.56%	7.56%				1.25	-0.24
Apr-01			0.00%	0.00%				0.5	-1.3
May-01			8.28%	8.28%				0.97	-0.41
Jun-01			0.00%	0.00%				-0.49	-1.3
Jul-01			0.00%	0.00%				-0.57	-1.35
Aug-01			13.02%	13.02%				1.06	-0.36
Sep-01			0.00%	0.00%				-0.46	-1.28
Oct-01			0.00%	0.00%				0.68	-1.42

10000105

Ex. 9

Exhibit 9.1 of 2

OP-3C - Installation Comments Met (Percent) - No dispatches

Date	CLEC Num	CLEC Den	CLEC Res	CLEC Sid	Overst Num	Overst Den	Overst Res	Overst Sid	Parity Scr
Oct-00	100.00%	100.00%	0.00%	0.00%	1.61	1.1	-0.92	-1.56	-1.56
Nov-00	100.00%	100.00%	0.00%	0.00%	0.92	0.87	-1.51	-1.51	-1.51
Dec-00	100.00%	100.00%	0.00%	0.00%	1.2	0.74	-1.2	-1.2	-1.2
Jan-01	100.00%	100.00%	0.00%	0.00%	1.16	0.51	-1.16	-1.16	-1.16
Feb-01	100.00%	100.00%	0.00%	0.00%	1.31	0.51	-1.31	-1.31	-1.31
Mar-01	100.00%	100.00%	0.00%	0.00%	N/A	N/A	N/A	N/A	N/A
Apr-01	100.00%	100.00%	0.00%	0.00%	0.66	0.66	-0.6	-0.6	-0.6
May-01	90.00%	90.00%	30.00%	0.00%	N/A	N/A	N/A	N/A	N/A
Jun-01	100.00%	100.00%	0.00%	0.00%	N/A	N/A	N/A	N/A	N/A
Jul-01	100.00%	100.00%	0.00%	0.00%	0.19	0.19	-1.12	-1.12	-1.12
Aug-01	100.00%	100.00%	0.00%	0.00%					
Sep-01									
Oct-01									

Date	CLEC Num	CLEC Den	CLEC Res	CLEC Sid	Overst Num	Overst Den	Overst Res	Overst Sid	Parity Scr
Nov-00	100.00%	100.00%	0.00%	0.00%	0.92	0.92	-1.56	-1.56	-1.56
Dec-00	100.00%	100.00%	0.00%	0.00%	0.92	0.92	-1.53	-1.53	-1.53
Jan-01									
Feb-01									
Mar-01									
Apr-01									
May-01									
Jun-01									
Jul-01									
Aug-01									
Sep-01									
Oct-01									

X

X

Date	CLEC Num	CLEC Den	CLEC Res	CLEC Sid	Overst Num	Overst Den	Overst Res	Overst Sid	Parity Scr
Nov-00	100.00%	100.00%	0.00%	0.00%	0.14	0.14	-1.2	-1.2	-1.2
Dec-00	100.00%	100.00%	0.00%	0.00%	1.16	1.16	-1.31	-1.31	-1.31
Jan-01	100.00%	100.00%	0.00%	0.00%	0.52	0.52	-1.31	-1.31	-1.31
Feb-01	100.00%	100.00%	0.00%	0.00%	0.76	0.76	-0.54	-0.54	-0.54
Mar-01	100.00%	100.00%	0.00%	0.00%	N/A	N/A	N/A	N/A	N/A
Apr-01	100.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
May-01	90.00%	90.00%	30.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Jun-01	100.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Jul-01	100.00%	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Aug-01									
Sep-01									
Oct-01									

October 26, 2001

Eschelon (ATI)

November 26, 2001

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF MINNESOTA

Gregory Scott	Chair
Edward A. Garvey	Commissioner
Marshall Johnson	Commissioner
LeRoy Koppendrayner	Commissioner
Phyllis Reha	Commissioner

In the Matter of a Commission Investigation Into  
Qwest's Compliance with Section 271 of the  
Telecommunications Act of 1996 that the  
Requested Authorization is Consistent with the  
Public Interest, Convenience and Necessity

PUC Docket No. P421/CI-01-1373  
OAH Docket No. 6-2500-14488-2

AFFIDAVIT OF  
ELLEN COPLEY

I, Ellen Copley, being duly sworn, state:

1. I am the Manager of Cost and Revenue Analysis in the Finance  
Department at Eschelon Telecom, Inc.

UNE-P Lines

2. As recently as April of 2002, Eschelon had less than 200 UNE-Platform ("UNE-P") lines in Minnesota. Throughout the states in which Eschelon operates in Qwest territory, at that time Eschelon had less than 350 UNE-P lines, including the UNE-P lines in Minnesota. Since then, Eschelon has started to migrate some of its lines from UNE-Eschelon ("UNE-E") to ("UNE-P"), as well as to order UNE-P lines. On the most recent bill received from Qwest (dated May 28, 2002), Qwest billed Eschelon for less than 655 UNE-P lines in Minnesota. Additional lines may have been migrated but have not yet appeared on the bill.

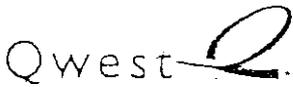
UNE-E or UNE Star Lines

3. The remainder of Eschelon's Off-Net' lines (that are not on UNE-P) in Qwest territory are virtually all priced according to a product that has been referred to as UNE-Eschelon ("UNE-E") or UNE Star. The vast majority of Eschelon's Off-Net lines are UNE-E lines.

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<sup>1</sup> Eschelon has its own switch in Minnesota for providing voice service. When using its switch to serve its customers, Eschelon orders collocation, loops, *etc.*, from Qwest. In some cases (particularly when a customer is outside of the area served by Eschelon's switch), Eschelon also orders UNE-E, UNE-P, or resale from Qwest to serve customers. Eschelon often refers to customers and lines served through Eschelon's own switching facilities as "On-Net" or "On-Switch" and customers and lines served through UNE-E, UNE-P, or resale as "Off-Net." Roughly 40% of Eschelon's lines in Minnesota are Off-Net.





For billing questions, call 1-800-452-9716  
 for service questions, call 1-800-279-8806

SOMERSET COUNTRY  
 Bill Date May 22, 2002  
 Account No 651 [REDACTED]

▼ LOCAL SERVICES

MONTHLY SERVICE-MAY 22 THRU JUN 21 150 58

BASIC SERVICES

These services are **necessary** for you to use your telephone  
 ONE PARTY BUSINESS 36 00

BASIC SERVICES

These services are necessary for you to use your telephone  
 ONE PARTY BUSINESS 36.00

OPTIONAL SERVICES

These services are provided at your request and are not  
 required as part of your basic telephone service  
 HUNTING FEATURE 3.29

BASIC SERVICES

These services are necessary for you to use your telephone  
 ONE PARTY BUSINESS 36 00

OPTIONAL SERVICES

These services are provided at your request and are not  
 required as part of your basic telephone service  
 HUNTING FEATURE

BASIC SERVICES

These services are necessary for you to use your telephone  
 ONE PARTY BUSINESS 36.00

FEDERAL ACCESS CHARGE

FEDERAL CHARGE -SERVICE PROVIDER NUMBER PORTABILITY

OWEST LOCAL SERVICES \$171 86

ADJUSTMENTS

ADJUSTMENTS APPLIED-OWEST LOCAL

APR 24 TRANSFER FROM 320 R22-2600 171 86%

APR 24 TRANSFER FROM 320 R22-2600 1.35%

TOTAL ADJUSTMENTS 173.21%

▼ UNREGULATED SERVICES

DIRECTORY ASSISTANCE 2 70

OWEST UNREGULATED SERVICES CHARGES 52.70

DIRECTORY ASSISTANCE

LESS 10 CALLS  
 4 CALL ALLOWANCE  
 6 CALLS @ \$ 45 PER CALL 2.70

A WHOLESALE DISCOUNT HAS BEEN APPLIED

TOTAL DIRECTORY ASSISTANCE 2.70

August 22, 2002

Eschelon Telecom, Inc.  
730 2<sup>nd</sup> Avenue South  
Suite 1200  
Minneapolis, MN 55402

David Kunde  
Executive Vice President

Dear Dave,

As requested by Eschelon, CGM performed a series of test calls and supporting analysis to determine whether or not all of the appropriate and applicable call records were being recorded and received at Eschelon for the purposes of Carrier Access Billing.

In total, we made and recorded 4,362 test calls. Calls were made in the following product areas: ONNET terminating (usage terminating to Eschelon's switches), UNE-E & UNE-P. The number of test calls by type does not represent the actual mix of calls originated or terminated by Eschelon customers, but the mix of test calls made was established so that a large enough sample could be gathered to perform data analysis. The unmatched percentage by type should be compared to Eschelon's actual call type distribution to estimate the actual missing calls and minutes across the Eschelon base of customers.

The test calling was conducted during April and May, 2002, and since that time, call record data has been received from Qwest and reviewed. The request to perform the test calling and subsequent analysis was done to augment a smaller sample of calling that was performed last year by PricewaterhouseCoopers. The services of three companies were utilized in this project, CCG Consulting, Inc of Riverdale, MD, CSS of Austin TX. and CGM, LLC of Atlanta, GA. All of these companies were experienced in the areas of Access Billing, Process Review and Control as it relates to telecommunications, and test calling. The combined resources assigned to this project have many years experience in telecommunications.

Attached are our findings to date, along with a brief synopsis of the test calling and data analysis process.

**1. Conclusions:**

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Exhibit 39

- a. In general, it is our conclusion that approximately 22% of the calls made for which Qwest was responsible for providing access records still remain unaccounted for at this time. By unaccounted for, we mean that we can't find a suitable match between the test call made by one of the testers and an EMR record submitted by Qwest to Eschelon for billing.
- b. We undertook a detailed review of the process by which Eschelon requests, receives and processes records of these types for billing, and based on this review, we believe it unlikely that an error in the Eschelon processing would account for the missing records. Based on our analysis, we can find no evidence that these calls were sent by Qwest to Eschelon for processing.
- c. Specifically, 15% of originating calls (calls that were originated from "test" numbers) were unmatched while 85% were matched.
- d. Thirty-three percent (33%) of terminating test calls (calls that were terminated to "test" numbers) were unmatched while 67% were matched.
- e. The over all percentage of matched minutes (84%) was consistently higher than the percentage of matched calls (78%). (See table below) This is consistent with the finding that, on average, we were able to find longer duration calls for matching, most notably on terminating calls.
- f. These results are consistent across locations, CLLI's, and Service Types, although:
  - 1. Centrex Plus Non-Matches are 25.3%. as opposed to 20.5% on other Service Types.
  - 2. Intra LATA calls were un-matched at 36.0%, which was approximately twice the un-matched rate of Inter LATA Calls. No test calls were made from or terminated to lines that were pre-subscribed to Qwest IntraLATA toll.
  - 3. Matching varied greatly by Dialing Pattern, as the table below shows:

Dialing Pattern	Percent Of Calls		Percent Of Duration	
	Matched	Un-Matched	Matched	Un-Matched
800 Total	67.0%	33.0%	64.7%	35.3%
1+ Total	78.5%	21.5%	83.3%	16.7%
1010XXX Total	81.1%	18.9%	85.6%	14.4%
Calling Card Total	84.1%	15.9%	93.1%	6.9%
DA Total	36.6%	63.4%	27.3%	72.7%
Operator Total	72.2%	27.8%	84.1%	15.9%
<b>Grand Total</b>	<b>77.9%</b>	<b>22.1%</b>	<b>84.3%</b>	<b>15.7%</b>

**2. Process Overview:**

- a. Test Calls were made from designated test numbers that were ordered and provisioned through normal channels, but which were designated for test calling. These test numbers were identical in configuration to other numbers of similar types of telephone service. A brief summary of the quantity and type of test calls made appears below:

Type	Direction	Test Calls Made
ON-NET	Terminating	478
UNE-E	Originating	1,259
	Terminating	972
UNE-P	Originating	1,367
	Terminating	286
		4,362

- b. Calls were made to and from these test numbers, and the durations of these test calls were recorded with stop watches.
- c. Test Calls were made from multiple locations within a region, and each region represented a different Qwest data processing center region.
- d. At the conclusion of the testing, all calls were assembled into a master database of test calls.
- e. Call Data was then received from Qwest as a part of the normal business process that exists today to facilitate the rating and billing of these types of calls. (In the case where Eschelon was required to submit a list of numbers to Qwest (UNE-E), the test numbers were included in the normal request process.)
- f. The call data received from Qwest was analyzed to see if a corresponding Call record in the test call database could be matched to the incoming call records received from Qwest. The Summary Results of that matching is listed below:
- g. A successful match was one in which call date, from number, to number were, at minimum the same between test and target calls.
- h. Access records were received for the time period April through July to allow for delayed usage to be delivered and analyzed.

2. Test Call Summary:

Call Direction	Total Calls Made		Test Calls Matched		Percent Matched	
	Calls	Minutes	Calls	Minutes	Calls	Minutes
Originating	2,626	3,907	2,230	3,446	84.9%	86.4%
Terminating	1,736	2,786	1,168	2,266	67.3%	81.4%
Total	4,362	6,773	3,398	5,712	77.9%	84.3%

3. Test Call Summary by Provisioning Type:

Provisioning Type	Call Direction	Test Calls			
		Matched	Unmatched	Grand Total	Matched PCT
ON-NET	Terminating	334	144	478	69.9%
<b>ON-NET Total</b>		<b>334</b>	<b>144</b>	<b>478</b>	<b>69.9%</b>
UNE-E	Originating	1135	124	1259	90.2%
	Terminating	638	334	972	65.6%
<b>UNE-E Total</b>		<b>1773</b>	<b>458</b>	<b>2231</b>	<b>79.5%</b>

		Test Calls			
Provisioning Type	Call Direction	Matched	Unmatched	Grand Total	Matched PCT
UNE-P	Originating	1095	272	1367	80.1%
	Terminating	196	90	286	68.5%
<b>UNE-P Total</b>		<b>1291</b>	<b>362</b>	<b>1653</b>	<b>78.1%</b>
<b>Grand Total</b>		<b>3388</b>	<b>864</b>	<b>4252</b>	<b>77.9%</b>

Please do not hesitate to contact me with questions regarding this project.

Sincerely,

Kevin Murphy  
 CGM, LLC  
 President

cc  
 Bill Markert - Eschelon  
 Jack Mungia - Eschelon  
 Jeff Oxley - Eschelon  
 Tim Brown - CCG  
 Gary Comfort - CGM  
 Marnell Robertson - CSS

1. Test Call Locations **Summary**

Test calling was conducted at the locations and to and **from** the **numbers** as listed below:

Location	CLLI	Test Number	Test Service Type	Tests Interval
Bellevue, WA	BLLVWASHDSO	425-289-2630	On-net (Terminating)	4/1-3/2002
		425-378-2725	UNE-E 1FB	4/2/2002
		425-401-7248	UNE-E Centrex+	
		425-378-8355	On-net	4/30/2002
		425-378-2725	UNE-P 1FB	
		425-401-7248	UNE-P Centrex+	
Seattle, WA	STTLWALADSO	206-957-2630	On-net (Terminating)	4/1-3/2002
		206-985-5808	UNE-E Centrex+	4/3/2002
Seattle, WA	STTLWA06DS4	206-957-2631	On-net	4/1-3/2002
		206-621-1537	UNE-E 1FB	4/4/2002
		206-903-1566	UNE-E Centrex 21	
		206-332-9377	UNE-E Centrex+	4/5/2002
		206-332-9378	On-net (Terminating)	5/1/2002
		206-621-1537	UNE-P 1FB	
		206-903-1566	UNE-P Centrex 21	
Seattle, WA	STTLWAWEDSO	206-957-2632	On-net (Terminating)	
		206-923-0176	UNE-E 1FB	4/3/2002
		206-932-2859	UNE-E Centrex 21	
		206-923-0176	UNE-P 1FB	5/2/2002
		206-932-2859	UNE-P Centrex 21	

Location	CLLI	Test Number	Test Service Type	Tests Interval
Tacoma, WA	TACMWALEDS1	253-682-2630	On-net (Terminating)	4/1-2/2002
		253-536-4871	UNE-E 1FB	4/4/2002
		253-536-4871	UNE-P 1FB	4/29/2002
		253-531-5805	UNE-P Centrex 21	
Minneapolis, MN	MPLSMNNDT62G	612-436-2629	On-net (Terminating)	4/15 & 16/2002
		612-339-2411	UNE-E 1FB	
		612-333-7371	UNE-E Centrex 21	
		612-335-9381	UNE-E Centrex+	
		612-339-2418	On-net (Terminating)	5/13/2002
		612-339-2411	UNE-P 1FB	
		612-333-7371	UNE-P Centrex 21	
		612-335-9381	UNE-P Centrex+	
Minneapolis, MN	MPLSMNNDTDS7	612-436-2630	On-net (Terminating)	4/15 & 16/2002
		612-338-5108	UNE-E 1FB	4/16 & 17/2002
		612-215-1241	UNE-E Centrex 21	
		612-338-5120	UNE-E Centrex+	
		612-215-1242	On-net (Terminating)	5/14/2002
		612-338-5108	UNE-P 1FB	
		612-215-1241	UNE-P Centrex 21	
		612-338-5120	UNE-P Centrex+	
Bloomington, MN	BLTNMNSODSO	952-345-5630	On-net (Terminating)	4/15/2002
		952-888-0519	UNE-E 1FB	4/17 & 18/2002
		952-884-1950	UNE-E Centrex 21	

Location		Test Number	Test Service Type	Tests Interval
		952-703-5285	JNE-E Centrex+	
		952-888-0672	On-net (Terminating)	5/16/2002
		952-888-0519	JNE-P 1FB	
		952-884-1950	JNE-P Centrex 21	
		952-703-5285	JNE-P Centrex+	
St Paul, MN	STPLMNMIDSO	651-287-3630	On-net (Terminating)	
		651-444-5567	JNE-E 1FB	4/18/2002
		651-644-3780	JNE-E Centrex 21	
		651-999-4992	JNE-E Centrex+	
		651-999-4993	On-net (Terminating)	5/15/2002
		651-644-5567	JNE-P 1FB	
		651-644-3780	JNE-P Centrex 21	
		651-999-4992	JNE-P Centrex+	
Golden Valley, MN	GLWMNORDSO	763-398-2630	On-net (Terminating)	
		952-546-0703	JNE-E 1FB	4/19/2002
		952-545-0450	JNE-E Centrex 21	
		952-543-3951	JNE-E Centrex+	
		952-545-0453	On-net (Terminating)	5/17/2002
		952-546-0703	JNE-P 1FB	
		952-545-0450	JNE-P Centrex 21	
		952-453-3951	JNE-P Centrex+	
Arvada, CO	ARVDCOMADSO	303-996-2630	On-net (Terminating)	4/22/2002
		303-456-5541	JNE-E 1FB	4/23/2002
		303-425-4514	JNE-E Centrex 21	

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Location	CLLI	Test Number	Test Service Type	Tests Interval
		303-403-1867	UNE-E Centrex+	
		606-456-5542	On-net (Terminating)	5/20/2002
		303-456-5541	UNE-P 1FB	
		303-425-4514	UNE-P Centrex 21	
Denver, CO	DNVRCODCDS0	303-996-2631	On-net (Terminating)	4/22/2002
		720-482-4007	UNE-E 1FB	
		720-482-1025	UNE-E Centrex 21	
		720-482-1025	On-net (Terminating)	5/21/2002
		720-482-4007	UNE-P 1FB	
		720-482-1003	UNE-P Centrex 21	
Lakewood, CO	LKWDCOMADS0	303-996-2632	On-net (Terminating)	
		303-462-3614	UNE-E 1FB	4/24/2002
		303-238-8524	UNE-E Centrex 21	
		720-544-8523	UNE-E Centrex+	
		720-544-8524	On-net (Terminating)	5/22/2002
		303-462-3614	UNE-P 1FB	
		303-238-8254	UNE-P Centrex 21	
		720-544-8523	UNE-P Centrex+	
Denver, CO	DNVRCOMADS4	303-996-2633	On-net (Terminating)	4/22 & 26/2002
		720-944-0933	UNE-E Centrex 21	4/26/2002
		720-944-0933	UNE-P Centrex+	5/24/2002
Denver, CO	DNVRCOWSDSO	303-996-2634	On-net (Terminating)	4/22 & 26/2002
		303-934-4010	UNE-E 1FB	4/25/2002

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Location	CLLI	Test Number	Test Service Type	Tests Interval
		303-922-6341	UNE-E Centrex 21	
		720-884-0544	UNE-E Centrex+	
		303-934-4157	On-net (Terminating)	5/23/2002
		303-934-4010	UNE-P 1FB	
		303-922-6341	UNE-P Centrex 21	
		720-884-0544	UNE-P Centrex+	

■ - Matching Results By Service Type

Service Type	Direction	Call Type	Matched		Un-Matched		Total		Matched Percent		UN Matched Percent			
			Calls	Duration	Calls	Duration	Calls	Duration	Calls	Duration	Calls	Duration		
IFB	Originating	DA	4	2,086	7	3,552	11	5,638	36.4%	37.0%	63.6%	63.0%		
		DACC			9	9,421	9	9,421	0.0%	0.0%	100.0%	100.0%		
		Inter800	4	388	-	-	4	388	100.0%	100.0%	0.0%	0.0%		
		InterLATA/Inter	494	506,767	21	15,303	515	522,070	95.9%	97.1%	4.1%	2.9%		
		InterLATA/Intra	202	170,114	12	8,906	214	179,020	94.4%	95.0%	5.6%	5.0%		
		IntraLATA/Intra	122	99,774	62	46,990	184	146,764	66.3%	68.0%	33.7%	32.0%		
		QLRN	4	4,822	-	-	4	4,822	100.0%	100.0%	0.0%	0.0%		
		RNA	4	513	-	-	4	513	100.0%	100.0%	0.0%	0.0%		
		<b>Originating Total</b>			<b>834</b>	<b>784,464</b>	<b>111</b>	<b>84,172</b>	<b>945</b>	<b>868,636</b>	<b>88.3%</b>	<b>90.3%</b>	<b>11.7%</b>	<b>9.7%</b>
		Terminating	InterLATNInter	355	436,651	147	49,888	502	486,539	70.7%	89.7%	29.3%	10.3%	
InterLATA/Intra	132		146,045	51	16,181	183	162,226	72.1%	90.0%	27.9%	10.0%			
IntraLATA/Intra	92		98,698	76	66,713	168	165,411	54.8%	59.7%	45.2%	40.3%			
<b>Terminating Total</b>			<b>579</b>	<b>681,394</b>	<b>274</b>	<b>132,782</b>	<b>853</b>	<b>814,176</b>	<b>67.9%</b>	<b>83.7%</b>	<b>32.1%</b>	<b>16.3%</b>		
<b>IFB Total</b>			<b>1,413</b>	<b>1,465,858</b>	<b>385</b>	<b>216,954</b>	<b>1,798</b>	<b>1,682,812</b>	<b>78.6%</b>	<b>87.1%</b>	<b>21.4%</b>	<b>12.9%</b>		

Service Type	Direction	Call Type	Matched		Un-Matched		Total		Matched Percent		Percent		
			Calls	Duration	Calls	Duration	Calls	Duration	Calls	Duration	Calls	Duration	
Centrex 21	Originating	DA	2	1,062	6	3,343	8	4,405	25.0%	24.1%	75.0%	75.9%	
		DACC	-	-	9	8,820	9	8,820	0.0%	0.0%	100.0%	100.0%	
		Inter800	3	276	-	-	3	276	100.0%	100.0%	0.0%	0.0%	
			InterLATA/Inter	444	414,050	32	32,658	476	446,708	93.3%	92.7%	6.7%	7.3%
			InterLATA/Intra	176	141,055	24	23,346	200	164,401	88.0%	85.8%	12.0%	14.2%
			IntraLATA/Intra	132	124,241	47	29,890	179	154,131	73.7%	80.6%	26.3%	19.4%
			QLRN	2	4,068	-	-	2	4,068	100.0%	100.0%	0.0%	0.0%
			RNA	1	145	1	154	2	299	50.0%	48.5%	50.0%	51.5%
		Originating Total		760	684,897	119	98,211	879	783,108	86.5%	87.5%	13.5%	12.5%
		Terminating	InterLATA/Inter	157	189,875	71	39,380	228	229,255	68.9%	82.8%	31.1%	17.2%
	InterLATA/Intra		84	90,412	36	18,135	120	108,547	70.0%	83.3%	30.0%	16.7%	
	IntraLATA/Intra		60	64,569	35	35,770	95	100,339	63.2%	64.4%	36.8%	35.6%	
		IntraLATA/Inter	-	-	6	-	6	-	0.0%	0.0%	100.0%	-	
	Terminating Total		301	344,856	148	93,285	449	438,141	67.0%	78.7%	33.0%	21.3%	
<b>Centrex 21 Total</b>			<b>1,061</b>	<b>1,029,753</b>	<b>267</b>	<b>191,496</b>	<b>1,328</b>	<b>1,221,249</b>	<b>79.9%</b>	<b>84.3%</b>	<b>20.1%</b>	<b>15.7%</b>	

Service Type	Direction	Call Type	Matched		Un-Matched		Total		Matched Percent		UN Matched Percent			
			Calls	Duration	Calls	Duration	Calls	Duration	Calls	Duration	Calls	Duration		
Centrex Plus	Originating	DA	2	1,086	4	2,459	6	3,545	33.3%	30.6%	66.7%	69.4%		
		DACC	1	972	8	7,991	9	8,963	11.1%	10.8%	88.9%	89.2%		
		Inter800	2	207	1	93	3	300	66.7%	69.0%	33.3%	31.0%		
		InterLATA/Inter	372	372,178	68	59,739	440	431,917	84.5%	86.2%	15.5%	13.8%		
		InterLATA/Intra	146	122,168	31	21,004	177	143,172	82.5%	85.3%	17.5%	14.7%		
		IntraLATA/Intra	109	99,515	54	50,588	163	150,103	66.9%	66.3%	33.1%	33.7%		
		QLRN	1	1,645	-	-	1	1,645	100.0%	100.0%	0.0%	0.0%		
		RNA	2	309	-	-	2	309	100.0%	100.0%	0.0%	0.0%		
		<b>Originating Total</b>			<b>635</b>	<b>598,080</b>	<b>166</b>	<b>141,874</b>	<b>801</b>	<b>739,954</b>	<b>79.3%</b>	<b>80.8%</b>	<b>20.7%</b>	<b>19.2%</b>
		Terminating	InterLATN/Inter	150	178,283	63	28,370	213	206,653	70.4%	86.3%	29.6%	13.7%	
InterLATN/Intra	76		83,995	33	17,145	109	101,140	69.7%	83.0%	30.3%	17.0%			
IntraLATA/Intra	62		71,463	50	40,195	112	111,658	55.4%	64.0%	44.6%	36.0%			
<b>Terminating Total</b>			<b>288</b>	<b>333,741</b>	<b>146</b>	<b>85,710</b>	<b>434</b>	<b>419,451</b>	<b>66.4%</b>	<b>79.6%</b>	<b>33.6%</b>	<b>20.4%</b>		
<b>Centrex Plus Total</b>			<b>923</b>	<b>931,821</b>	<b>312</b>	<b>227,584</b>	<b>1,235</b>	<b>1,159,405</b>	<b>74.7%</b>	<b>80.4%</b>	<b>25.3%</b>	<b>19.6%</b>		
<b>Grand Total</b>			<b>3,397</b>	<b>3,427,482</b>	<b>361</b>	<b>636,034</b>	<b>3,758</b>	<b>4,063,486</b>	<b>77.9%</b>	<b>84.3%</b>	<b>22.1%</b>	<b>15.7%</b>		

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2. Matching Results By Call Type

Call Type	Service Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
DA	1FB	4	7	11	36.4%	63.6%
	Centrex 21	2	6	8	25.0%	75.0%
	Centrex Plus	2	4	6	33.3%	66.7%
<b>DA Total</b>		<b>8</b>	<b>17</b>	<b>25</b>	<b>32.0%</b>	<b>68.0%</b>
DACC	1FB	9	9	9	0.0%	100.0%
	Centrex 21	9	9	9	0.0%	100.0%
	Centrex Plus	1	8	9	11.1%	88.9%
<b>DACC Total</b>		<b>1</b>	<b>26</b>	<b>27</b>	<b>3.7%</b>	<b>96.3%</b>
Inter800	1FB	4	4	4	100.0%	0.0%
	Centrex 21	3	3	3	100.0%	0.0%
	Centrex Plus	2	1	3	66.7%	33.3%
<b>Inter800 Total</b>		<b>9</b>	<b>1</b>	<b>10</b>	<b>90.0%</b>	<b>10.0%</b>
InterLATA/Inter	1FB	849	168	1017	83.5%	16.5%
	Centrex 21	601	103	704	85.4%	14.6%
	Centrex Plus	522	131	653	79.9%	20.1%
<b>InterLATA/Inter Total</b>		<b>1972</b>	<b>402</b>	<b>2374</b>	<b>83.1%</b>	<b>16.9%</b>
InterLATA/Intra	1FB	397	63	397	84.1%	15.9%
	Centrex 21	260	60	320	81.3%	18.8%
	Centrex Plus	222	64	286	77.6%	22.4%
<b>InterLATA/Intra Total</b>		<b>816</b>	<b>187</b>	<b>1003</b>	<b>81.4%</b>	<b>18.6%</b>
IntraLATA/Intra	1FB	214	138	352	60.8%	39.2%

Call Type	Service Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
	Centrex 21	192	82	274	70.1%	29.9%
	Centrex Plus	171	104	275	62.2%	37.8%
<b>IntraLATA/Intra Total</b>		<b>577</b>	<b>324</b>	<b>901</b>	<b>64.0%</b>	<b>36.0%</b>
<b>QLRN</b>	<b>1FB</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>100.0%</b>	<b>0.0%</b>
	Centrex 21	2		2	100.0%	0.0%
	Centrex Plus	1		1	100.0%	0.0%
<b>QLRN Total</b>		<b>7</b>	<b>7</b>	<b>7</b>	<b>100.0%</b>	<b>0.0%</b>
<b>RNA</b>	<b>1FB</b>	<b>4</b>	<b>4</b>	<b>4</b>	<b>100.0%</b>	<b>0.0%</b>
	Centrex 21	1		1	50.0%	50.0%
	Centrex Plus	2		2		
<b>RNA Total</b>		<b>7</b>	<b>8</b>	<b>8</b>	<b>87.5%</b>	<b>12.5%</b>
<b>IntraLATA/Inter</b>	Centrex 21		6	6	0.0%	100.0%
<b>IntraLATA/Inter Total</b>		<b>6</b>	<b>6</b>	<b>6</b>	<b>0.0%</b>	<b>100.0%</b>
<b>Grand Total</b>		<b>997</b>	<b>964</b>	<b>4361</b>	<b>77.9%</b>	<b>22.1%</b>

3. Matching Results By Location:

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
ARVDCOMADS0	Originating	DACC	1	2	3	33.3%	66.7%
		InterLATA/Inter	124	1	125	99.2%	0.8%
		InterLATA/Intra	58		58	100.0%	0.0%
		IntraLATA/Intra	54	10	64	84.4%	15.6%

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
	<b>Originating Total</b>		237	13	250	94.8%	5.2%
	<b>Terminating</b>	InterLATA/Inter	63	17	80	78.8%	21.3%
		InterLATA/Intra	36	14	50	72.0%	28.0%
		IntraLATA/Intra	26	19	45	57.8%	42.2%
	<b>Terminating Total</b>		125	50	175	71.4%	28.6%
<b>ARVDCOMADS0</b>	<b>Total</b>		<b>362</b>	<b>63</b>	<b>425</b>	<b>85.2%</b>	<b>14.8%</b>
<b>BLLVWASHDS0</b>	Originating	DA	2	4	6	33.3%	66.7%
		InterLATA/Inter	57	5	62	91.9%	8.1%
		InterLATA/Intra	10	-	10	100.0%	0.0%
		IntraLATA/Intra	21	1	22	95.5%	4.5%
		QLRN	2	-	2	100.0%	0.0%
		RNA	2	-	2	100.0%	0.0%
	<b>Originating Total</b>		94	10	104	90.4%	9.6%
	<b>Terminating</b>	InterLATA/Inter	28	5	33	84.8%	15.2%
		IntraLATA/Intra	11	9	20	55.0%	45.0%
	<b>Terminating Total</b>		39	14	53	73.6%	26.4%
<b>BLLVWASHDS0</b>	<b>Total</b>		<b>133</b>	<b>24</b>	<b>157</b>	<b>84.7%</b>	<b>15.3%</b>
<b>BLTNMNSODS0</b>	Originating	DACC	-	3	3	0.0%	100.0%
		InterLATA/Inter	125	2	127	98.4%	1.6%
		InterLATA/Intra	56	3	59	94.9%	5.1%
		IntraLATA/Intra	22	18	40	55.0%	45.0%
	<b>Originating Total</b>		203	26	229	88.6%	11.4%
	<b>Terminating</b>	InterLATA/Inter	59	26	85	69.4%	30.6%
		InterLATA/Intra	35	13	48	72.9%	27.1%
		IntraLATA/Intra	29	10	39	74.4%	25.6%
	<b>Terminating Total</b>		123	49	172	71.5%	28.5%
<b>BLTNMNSODS0</b>	<b>Total</b>		<b>326</b>	<b>75</b>	<b>401</b>	<b>81.3%</b>	<b>18.7%</b>

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
<b>DNVRCODCDS0</b>	<b>Originating</b>	DACC	-	2	2	0.0%	100.0%
		Inter800	2	-	2	100.0%	0.0%
		InterLATA/Inter	84	-	84	100.0%	0.0%
		InterLATA/Intra	38	-	38	100.0%	0.0%
		IntraLATA/Intra	25	9	34	73.5%	26.5%
	<b>Originating Total</b>		<b>149</b>	<b>11</b>	<b>160</b>	<b>93.1%</b>	<b>6.9%</b>
	<b>Terminating</b>	InterLATA/Inter	35	22	57	61.4%	38.6%
		InterLATA/Intra	19	9	28	67.9%	32.1%
		IntraLATA/Intra	5	12	17	29.4%	70.6%
	<b>Terminating Total</b>		<b>59</b>	<b>43</b>	<b>102</b>	<b>57.8%</b>	<b>42.2%</b>
<b>DNVRCODCDS0 Total</b>			<b>208</b>	<b>54</b>	<b>262</b>	<b>79.4%</b>	<b>20.6%</b>
<b>DNVRCOMADS4</b>	<b>Originating</b>	DACC	-	1	1	0.0%	100.0%
		Inter800	1	-	1	100.0%	0.0%
		InterLATA/Inter	49	3	52	94.2%	5.8%
		InterLATA/Intra	21	-	21	100.0%	0.0%
		IntraLATA/Intra	19	4	23	82.6%	17.4%
	<b>Originating Total</b>		<b>90</b>	<b>8</b>	<b>98</b>	<b>91.8%</b>	<b>8.2%</b>
	<b>Terminating</b>	InterLATA/Inter	32	15	47	68.1%	31.9%
		InterLATA/Intra	20	4	24	83.3%	16.7%
		IntraLATA/Intra	10	13	23	43.5%	56.5%
	<b>Terminating Total</b>		<b>62</b>	<b>32</b>	<b>94</b>	<b>66.0%</b>	<b>34.0%</b>
<b>DNVRCOMADS4 Total</b>			<b>152</b>	<b>40</b>	<b>192</b>	<b>79.2%</b>	<b>20.8%</b>
<b>DNVRCOWSBS0</b>	<b>Originating</b>	DACC	-	3	3	0.0%	100.0%
		Inter800	3	1	4	75.0%	25.0%
		InterLATA/Inter	107	17	124	86.3%	13.7%
		InterLATA/Intra	47	9	56	83.9%	16.1%

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
		IntraLATA/Intra	34	28	62	54.8%	45.2%
	<b>Originating Total</b>		<b>191</b>	<b>58</b>	<b>249</b>	<b>76.7%</b>	<b>23.3%</b>
	<b>Terminating</b>	InterLATA/Inter	48	31	79	60.8%	39.2%
		InterLATA/Intra	32	15	47	68.1%	31.9%
		IntraLATA/Intra	6	27	33	18.2%	81.8%
	<b>Terminating Total</b>		<b>86</b>	<b>73</b>	<b>159</b>	<b>54.1%</b>	<b>45.9%</b>
<b>DNVRCOWSDS0</b>	<b>Total</b>		<b>277</b>	<b>131</b>	<b>408</b>	<b>67.9%</b>	<b>32.1%</b>
<b>GLVYMNORDS0</b>	<b>Originating</b>	DACC	-	3	3	0.0%	100.0%
		InterLATA/Inter	88	23	111	79.3%	20.7%
		InterLATA/Intra	44	14	58	75.9%	24.1%
		IntraLATA/Intra	7	11	18	38.9%	61.1%
	<b>Originating Total</b>		<b>139</b>	<b>51</b>	<b>190</b>	<b>73.2%</b>	<b>26.8%</b>
	<b>Terminating</b>	InterLATA/Inter	51	24	75	68.0%	32.0%
		InterLATA/Intra	33	13	46	71.7%	28.3%
		IntraLATA/Intra	15	7	22	68.2%	31.8%
	<b>Terminating Total</b>		<b>99</b>	<b>44</b>	<b>143</b>	<b>69.2%</b>	<b>30.8%</b>
<b>GLVYMNORDS0</b>	<b>Total</b>		<b>238</b>	<b>95</b>	<b>333</b>	<b>71.5%</b>	<b>28.5%</b>
<b>LKWDCOMADS0</b>	<b>Originating</b>	DACC	-	3	3	0.0%	100.0%
		Inter800	3	-	3	100.0%	0.0%
		InterLATA/Inter	122	9	131	93.1%	6.9%
		InterLATA/Intra	51	11	62	82.3%	17.7%
		IntraLATA/Intra	38	25	63	60.3%	39.7%
	<b>Originating Total</b>		<b>214</b>	<b>48</b>	<b>262</b>	<b>81.7%</b>	<b>18.3%</b>
	<b>Terminating</b>	InterLATA/Inter	44	33	77	57.1%	42.9%
		InterLATA/Intra	23	16	39	59.0%	41.0%
		IntraLATA/Intra	17	23	40	42.5%	57.5%
	<b>Terminating Total</b>		<b>84</b>	<b>72</b>	<b>156</b>	<b>53.8%</b>	<b>46.2%</b>

CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
<b>LKWDCOMADS0 Total</b>			<b>298</b>	<b>120</b>	<b>418</b>	<b>71.3%</b>	<b>28.7%</b>
<b>MPLSMNDT62G</b>	<b>Originating</b>	DACC	-	3	3	0.0%	100.0%
		InterLATA/Inter	124	13	137	90.5%	9.5%
		InterLATA/Intra	53	4	57	93.0%	7.0%
		IntraLATA/Intra	20	22	42	47.6%	52.4%
	<b>Originating Total</b>		<b>197</b>	<b>42</b>	<b>239</b>	<b>82.4%</b>	<b>17.6%</b>
	<b>Terminating</b>	InterLATA/Inter	61	29	90	67.8%	32.2%
		InterLATA/Intra	19	9	28	67.9%	32.1%
		IntraLATA/Intra	20	7	27	74.1%	25.9%
		IntraLATA/Inter	-	6	6	0.0%	100.0%
	<b>Terminating Total</b>		<b>100</b>	<b>51</b>	<b>151</b>	<b>66.2%</b>	<b>33.8%</b>
<b>MPLSMNDT62G Total</b>			<b>297</b>	<b>93</b>	<b>390</b>	<b>76.2%</b>	<b>23.8%</b>
<b>STPLMNMIDS0</b>	<b>Originating</b>	DACC	-	6	6	0.0%	100.0%
		InterLATA/Inter	233	25	258	90.3%	9.7%
		InterLATA/Intra	102	17	119	85.7%	14.3%
		IntraLATA/Intra	45	28	73	61.6%	38.4%
	<b>Originating Total</b>		<b>380</b>	<b>76</b>	<b>456</b>	<b>83.3%</b>	<b>16.7%</b>
	<b>Terminating</b>	InterLATA/Inter	1211	42	1631	74.2%	25.8%
		InterLATA/Intra	62	24	86	72.1%	27.9%
		IntraLATA/Intra	36	10	46	78.3%	21.7%
	<b>Terminating Total</b>		<b>219</b>	<b>76</b>	<b>295</b>	<b>74.2%</b>	<b>25.8%</b>
<b>STPLMNMIDS0 Total</b>			<b>599</b>	<b>152</b>	<b>751</b>	<b>79.8%</b>	<b>20.2%</b>
<b>STTLWA06DS4</b>	<b>Originating</b>	DA	3	6	9	33.3%	66.7%
		InterLATA/Inter	95	1	96	99.0%	1.0%
		InterLATA/Intra	18	-	18	100.0%	0.0%
		IntraLATA/Intra	38	-	38	100.0%	0.0%

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CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
		QLRN	2	-	2	100.0%	0.0%
		RNA	3	-	3	100.0%	0.0%
	<b>Originating Total</b>		<b>159</b>	<b>7</b>	<b>166</b>	<b>95.8%</b>	<b>4.2%</b>
	<b>Terminating</b>	InterLATA/Inter	46	7	53	86.8%	13.2%
		InterLATA/Intra	8	-	8	100.0%	0.0%
		IntraLATA/Intra	23	2	25	92.0%	8.0%
	<b>Terminating Total</b>		<b>77</b>	<b>9</b>	<b>86</b>	<b>89.5%</b>	<b>10.5%</b>
<b>STTLWA06DS4 Total</b>			<b>236</b>	<b>16</b>	<b>252</b>	<b>93.7%</b>	<b>6.3%</b>
<b>STTLWALADS0</b>	<b>Originating</b>	InterLATA/Inter	19	-	19	100.0%	0.0%
		InterLATA/Intra	3	-	3	100.0%	0.0%
		IntraLATA/Intra	12	-	12	100.0%	0.0%
	<b>Originating Total</b>		<b>34</b>	<b>-</b>	<b>34</b>	<b>100.0%</b>	<b>0.0%</b>
	<b>Terminating</b>	InterLATA/Inter	15	5	20	75.0%	25.0%
		InterLATA/Intra	1	-	1	100.0%	0.0%
		IntraLATA/Intra	4	8	12	33.3%	66.7%
	<b>Terminating Total</b>		<b>20</b>	<b>13</b>	<b>33</b>	<b>60.6%</b>	<b>39.4%</b>
<b>STTLWALADS0 Total</b>			<b>54</b>	<b>13</b>	<b>67</b>	<b>80.6%</b>	<b>19.4%</b>
<b>STTLWAWEDS0</b>	<b>Originating</b>	DA	1	5	6	16.7%	83.3%
		InterLATA/Inter	37	21	58	63.8%	36.2%
		InterLATA/Intra	6	9	15	40.0%	60.0%
		IntraLATA/Intra	29	7	36	80.6%	19.4%
		QLRN	1	-	1	100.0%	0.0%
		RNA	1	1	2	50.0%	50.0%
	<b>Originating Total</b>		<b>75</b>	<b>43</b>	<b>118</b>	<b>63.6%</b>	<b>36.4%</b>
	<b>Terminating</b>	InterLATA/Inter	32	14	46	69.6%	30.4%
		InterLATA/Intra	2	3	5	40.0%	60.0%
		IntraLATA/Intra	12	14	26	46.2%	53.8%

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CLLI	Direction	Call Type	Matched Calls	Unmatched Calls	Grand Total Calls	Matched Percent	Un-Matched Percent
	<b>Terminating Total</b>		46	31	77	59.7%	40.3%
<b>STTLWAWEDS0 Total</b>			<b>121</b>	<b>74</b>	<b>195</b>	<b>62.1%</b>	<b>37.9%</b>
<b>TACMWALEDS1</b>	<b>Originating</b>	DA	2	2	4	50.0%	50.0%
		InterLATA/Inter	46	1	47	97.9%	2.1%
		InterLATA/Intra	17	-	17	100.0%	0.0%
		QLRN	2	-	2	100.0%	0.0%
		RNA	1	-	1	100.0%	0.0%
	<b>Originating Total</b>		<b>68</b>	<b>3</b>	<b>71</b>	<b>95.8%</b>	<b>4.2%</b>
	<b>Terminating</b>	InterLATA/Inter	27	11	38	71.1%	28.9%
		InterLATA/Intra	2	-	2	100.0%	0.0%
	<b>Terminating Total</b>		<b>29</b>	<b>11</b>	<b>40</b>	<b>72.5%</b>	<b>27.5%</b>
<b>TACMWALEDS1 Total</b>			<b>97</b>	<b>14</b>	<b>111</b>	<b>87.4%</b>	<b>12.6%</b>
<b>Grand Total</b>			<b>3,398</b>	<b>964</b>	<b>4,362</b>	<b>77.9%</b>	<b>22.1%</b>

4. Dial Pattern

Dialing Pattern	Direction	Call Type	Matched		Unmatched		Total		Percent Of Calls		Percent Of Duration	
			Calls	Duration (tenths)	Calls	Duration (tenths)	Calls	Duration	Matched	Un-Matched	Matched	Un-Matched
800	Originating	InterLATA/Inter	61	52,825	30	28,815	91	81,640	67.0%	33.0%	64.7%	35.3%
	Originating Total		61	52,825	30	28,815	91	81,640	67.0%	33.0%	64.7%	35.3%
<b>800 Total</b>			<b>61</b>	<b>52,825</b>	<b>30</b>	<b>28,815</b>	<b>91</b>	<b>81,640</b>	<b>67.0%</b>	<b>33.0%</b>	<b>64.7%</b>	<b>35.3%</b>
1+	Originating	InterLATA/Inter	405	462,777	31	30,596	436	493,373	92.9%	7.1%	93.8%	6.2%
		InterLATA/Intra	228	203,845	27	22,402	255	226,247	89.4%	10.6%	90.1%	9.9%
		IntraLATA/Intra	169	168,035	98	87,630	267	255,665	63.3%	36.7%	65.7%	34.3%
		QLRN	7	10,535	-	-	7	10,535	100.0%	0.0%	100.0%	0.0%
		RNA	7	967	1	154	8	1,121	87.5%	12.5%	86.3%	13.7%
	Originating Total		816	846,159	157	140,782	973	986,941	83.9%	16.1%	85.7%	14.3%
	Terminating	InterLATA/Inter	214	245,548	82	47,257	296	292,805	72.3%	27.7%	83.9%	16.1%
		InterLATN/Intra	191	195,185	44	20,550	235	215,735	81.3%	18.7%	90.5%	9.5%
		IntraLATA/Intra	131	140,230	85	78,488	216	218,718	60.6%	39.4%	64.1%	35.9%
		IntraLATA/Inter			3		3		0.0%	100.0%		

Dialing Pattern	Direction	Call Type	Matched		Unmatched		Total		Percent OF Calls		Percent OF Duration	
			Calls	Duration (tenths)	Calls	Duration (tenths)	Calls	Duration	Matched	Un-Matched	Matched	Un-Matched
	Terminating Total		536	580,963	214	146,295	750	727,258	71.5%	28.5%	79.9%	20.1%
<b>1+ Total</b>			<b>1,352</b>	<b>1,427,122</b>	<b>371</b>	<b>287,077</b>	<b>1,723</b>	<b>1,714,199</b>	<b>78.5%</b>	<b>21.5%</b>	<b>83.3%</b>	<b>16.7%</b>
1010XXX	Originating	Inter800	9	871	1	93	10	964	90.0%	10.0%	90.4%	9.6%
			257	200,987	19	17,518	276	218,505	93.1%	6.9%	92.0%	8.0%
		InterLATNIntra	212	155,581	13	9,906	225	165,487	94.2%	5.8%	94.0%	6.0%
		IntraLATA/Intra	147	108,591	20	13,815	167	122,406	88.0%	12.0%	88.7%	11.3%
	Originating Total		625	466,030	53	41,332	678	507,362	92.2%	7.8%	91.9%	8.1%
	Terminating	InterLATNInter	115	146,810	49	16,120	164	162,930	70.1%	29.9%	90.1%	9.9%
		InterLATA/Intra	46	60,726	48	24,969	94	85,695	48.9%	51.1%	70.9%	29.1%
		IntraLATA/Intra	57	63,892	46	41,592	103	105,484	55.3%	44.7%	60.6%	39.4%
	Terminating Total		218	271,428	143	82,681	361	354,109	60.4%	39.6%	76.7%	23.3%
<b>1010XXX Total</b>			<b>843</b>	<b>737,458</b>	<b>196</b>	<b>124,013</b>	<b>1,039</b>	<b>861,471</b>	<b>81.1%</b>	<b>18.9%</b>	<b>85.6%</b>	<b>14.4%</b>
Calling Card	Originating	InterLATA/Inter	466	456,470	31	21,194	497	477,664	93.8%	6.2%	95.6%	4.4%
	Originating Total		466	456,470	31	21,194	497	477,664	93.8%	6.2%	95.6%	4.4%

Dialing Pattern	Direction	Call Type	Matched		Unmatched		Total		Percent OF Calls		Percent Of Duration	
			Calls	Duration (tenths)	Calls	Duration (tenths)	Calls	Duration	Matched	Un-Matched	Matched	Un-Matched
	Terminating	InterLATA/Inter	243	307,445	103	35,026	346	342,471	70.2%	29.8%	89.8%	10.2%
	Terminating											
	Total		243	307,445	103	35,026	346	342,471	70.2%	29.8%	89.8%	10.2%
<b>Calling Card</b>												
<b>Total</b>			<b>709</b>	<b>763,915</b>	<b>134</b>	<b>56,220</b>	<b>843</b>	<b>820,135</b>	<b>84.1%</b>	<b>15.9%</b>	<b>93.1%</b>	<b>6.9%</b>
DA	Originating	DA	8	4,234	17	9,354	25	13,588	32.0%	68.0%	31.2%	68.8%
		DACC	1	972	26	26,232	27	27,204	3.7%	96.3%	3.6%	96.4%
		InterLATNInter	25	11,014	3	1,537	28	12,551	89.3%	10.7%	87.6%	12.2%
		InterLATNIntra	13	5,178	15	8,175	26	13,353	46.4%	53.6%	38.8%	61.2%
		IntraLATA/Intra	2	963	24	14,307	26	15,270	7.7%	92.3%	6.3%	93.7%
	Originating											
	Total		49	22,361	85	59,605	134	81,966	36.6%	63.4%	27.3%	72.7%
<b>DA Total</b>			<b>49</b>	<b>22,361</b>	<b>85</b>	<b>59,605</b>	<b>134</b>	<b>81,966</b>	<b>36.6%</b>	<b>63.4%</b>	<b>27.3%</b>	<b>72.7%</b>
Operator	Originating	InterLATA/Inter	96	108,922	7	8,040	103	116,962	93.2%	6.8%	93.1%	6.9%
		InterLATA/Intra	71	68,733	12	12,773	83	81,506	85.5%	14.5%	84.3%	15.7%
		IntraLATA/Intra	46	46,550	21	11,716	67	58,266	68.7%	31.3%	79.9%	20.1%
	Originating											
	Total		213	224,205	40	32,529	253	256,734	84.2%	15.8%	87.3%	12.7%

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Dialing Pattern	Direction	Call Type	Matched		Unmatched		Total		Percent Of Calls		Percent Of Duration	
			Calls	Duration (tenths)	Calls	Duration (tenths)	Calls	Duration	Matched	Un-Matched	Matched	Un-Matched
	Terminating	InterLATA/Inter	90	105,006	47	19,235	137	124,241	65.7%	34.3%	84.5%	15.5%
		InterLATNIntra	55	64,541	28	5,942	83	70,483	66.3%	33.7%	91.6%	8.4%
		IntraLATA/Intra	26	30,608	30	22,598	56	53,206	46.4%	53.6%	57.5%	42.5%
		IntraLATA/Inter	-	-	3	-	3	-	0.0%	100.0%	-	-
	<b>Terminating Total</b>		<b>171</b>	<b>200,155</b>	<b>108</b>	<b>47,775</b>	<b>279</b>	<b>247,930</b>	<b>61.3%</b>	<b>38.7%</b>	<b>80.7%</b>	<b>19.3%</b>
	<b>Operator Total</b>		<b>384</b>	<b>424,360</b>	<b>148</b>	<b>80,304</b>	<b>532</b>	<b>504,664</b>	<b>72.2%</b>	<b>27.8%</b>	<b>84.1%</b>	<b>15.9%</b>
	<b>Grand Total</b>		<b>3,398</b>	<b>3,428,041</b>	<b>364</b>	<b>636,034</b>	<b>4,362</b>	<b>4,064,075</b>	<b>77.9%</b>	<b>22.1%</b>	<b>84.3%</b>	<b>15.7%</b>

-----Original Message-----

**From:** Chris Siewert [[SMTP:csiewer@qwest.com](mailto:SMTP:csiewer@qwest.com)]  
<<mailto:SMTP:csiewer@qwest.com>>  
**Sent:** Wednesday, September 18, 2002 3:48 PM  
**To:** Isaacs, Kimberly D.  
**Cc:** Johnson, Bonnie J.; 'csiewer@qwest.com'; 'jlnovak@qwest.com';  
'plevene@qwest.com'; Vigoren, Barbara J.  
**Subject:** RE: Tier 0 confusion

This is in reponse to your e-mail request:

1. The CSIE Tier 0,1,2 have been covered on the process *to* handle PSON requests.  
An MCC was sent out and covered.
2. There is not a single point of contact assigned, PSON requests will follow the normal Qwest Escalation Process.
3. The call type for PSON request will be "Order Status".

Thanks,  
Chris

-----Original Message-----

From: Clauaon, Karen L.  
Sent: Tuesday, August 27, 2002 6:38 PM  
To: Mscott@cc.state.az.us  
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Subject: Cap Gemini data reconciliation

Maureen:

We have a few questions about the Cap Gemini data reconciliation and would like to discuss them when you have a chance. I left you voice mails about this and some other issues, but I know how busy you are. Maybe we can schedule a time to discuss, perhaps even a conference call when Cap Gemini is here at Eschelon this week.

Cap Gemini described what had been decided about the scope of Cap Gemini's work. We would have liked to have been included in those discussions with them and Qwest, so that we understood it better. Other CLECs may have also had an interest. Based on what Cap Gemini said during our call on Friday, a decision was made to limit the work to off-net orders (UNE-Star and UNE-P) for May 2002. And, if we understand it correctly, to look at OP5/processing of service orders for those types of orders. We have suggested that both April and May 2002 be included to provide enough information for review. We also had thought that the review may look at other issues we raised in the workshop and, in particular, billing. Cap Gemini said that billing issues would not be included, not for UNE-Star or UNE-P. They said something about a decision or agreement to look at billing, if at all, after the migration of some UNE-Star lines to UNE-P. The issue exists now (and has for some time), however, and we do not know why the review should be delayed. Also, the billing problems are not limited to UNE-Star and include the issues we raised with respect to UNE-P bills. Cap Gemini mentioned the term "shore up," but we didn't know what that meant, and we didn't discuss specifics. Cap Gemini said that we should ask you about that issue.

We also had a question about which off-net orders would be included in the work, because the number of LSRs that Cap Gemini initially mentioned in a previous call was higher than the number Eschelon submitted for new off-net orders. As discussed at the workshop, orders for migrations from UNE-Star to UNE-P for existing customers are hand-held and are not part of the normal process that we understand is being tested. The numbers sounded as though

they may have included the migration, as well as new, orders. Cap Gemini didn't necessarily think so, because they had identified or were looking into whether some loop orders had been inadvertently included. We would like to know what orders are being included and ensure we are all on the same page.

In response to our questions about the scope of the work, Cap Gemini indicated that Qwest was not willing to pay for additional work. In addition, Cap Gemini said that Qwest pointed to the level of work required. As a small company, we are concerned about the resources required as well, but we still believe we need to look at these issues. We understand that Cap Gemini is funded by Qwest and cannot determine scope by itself. We are hoping to discuss these issues with you. Cap Gemini will be here tomorrow and Thursday. Please let me know if you are available to discuss these issues this week. I believe there is also a TAG call tomorrow. Because the TAG call time conflicts with our meeting with Cap Gemini, I don't believe we'll be able to have someone on that call. Perhaps you could forward this to that distro as well and they could discuss it, if that is an appropriate forum.

Thank you,

Karen L. Clauson  
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