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**EX PARTE**

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest  
Communications International Inc. for  
Authorization to Provide In-Region, InterLATA  
Service in the States of Colorado, Idaho, Iowa,  
Montana, Nebraska, North Dakota, Utah,  
Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing in response to several questions from Commission staff regarding loop qualification issues.

*What percentage of the time does the Raw Loop Data Tool (“RLDT”) provide the actual loop length from engineering records as opposed to an average loop length produced by a Mechanized Loop Test (“MLT”)?*

The RLDT pulls its information from the Loop Qualification Database (“LQDB”). Many loops in the LQDB contain both MLT-generated loop length and actual loop length information. For those loops, Qwest will return both pieces of data when CLECs request the raw loop information through the RLDT.

Of the loops in the LQDB, 68.3% contain MLT-generated loop length information. Roughly 30% of the loops in the LQDB are incapable of having MLT-generated loop lengths because they are connected to pair gain, are unbundled loops, are spare loops, or are in wire centers that do not have MLT capabilities. In short, less than 5% of all loops in the LQDB are capable of having MLT-generated loops lengths but do not.

Of the loops in the LQDB, 93.7% contain actual loop length information from engineering records, and 96% contain either actual length information or MLT-generated loop length, or both. Thus, only 4% of the loops in the LQDB do not contain any loop length at all. For those loops, CLECs can avail themselves of the manual loop make-up process, whereby Qwest will provide raw loop information to the CLEC within 48 hours.

*What is Qwest's false positive rate?*

From the beginning of June 2002 through the end of October 2002, Qwest's false positive rate for Qwest's Retail DSL Loop Qualification Tool ("LQT") was just 2.2%. Because the same tool, process, and algorithm are used to qualify both Qwest Retail DSL and Qwest DSL for Resale queries, CLECs would receive the same false positive rate when they use the Qwest DSL for Resale LQT.

*Please confirm that Qwest's Retail DSL LQT uses the loop length contained in the "Makeup Description" field and only uses the "MLT Distance" field when the loop length "Makeup Description" field is not available. Also, clarify whether the "Makeup Description" field contains loop lengths from engineering records.*

Qwest's Retail DSL LQT primarily uses the loop length that is reflected in the "Makeup Description" field for loop qualification, and only uses the MLT Distance field when the actual loop length is not available. The segment length information reflected in the "Makeup Description" field is populated from engineering records.

*Please explain what steps were taken during 2001 to populate the "Makeup Description" field.*

Qwest previously has described the steps it took to populate the "Makeup Description" field. Details about this process can be found in the following places in the record:

- Qwest 11/07/02 *Ex Parte*, Tab 10, page 26;
- ROC I OSS Reply Declaration at ¶ 46;
- ROC II OSS Reply Declaration at ¶¶ 46-49;
- ROC III OSS Reply Declaration at ¶¶ 39-40.

*Is all information relevant to loop qualification that is available to Qwest representatives, not just Qwest's Retail arm, available in the RLDT?*

Yes. Qwest has populated all of the loop information needed for loop qualification purposes in the LQDB. The LQDB is the source of loop qualification information for both Qwest representatives and CLECs. Qwest representatives use the Qwest Retail DSL LQT, which displays only a “green/red” response to a loop qualification query. This Retail tool uses the loop make-up information in the LQDB, but, unlike the tools available to CLECs, does not display the underlying loop make up information. CLEC representatives have access to this same “green/red” response (in the form of a “yes/no”) through the Qwest DSL for Resale portion of the Loop Qualification tool; but CLECs also have access to underlying loop make up information through the RLDT. The source of the information in the RLDT also is the LQDB. In addition, as noted above, CLECs can request that Qwest perform a manual search of loop make-up information if the tools return information that is incomplete or inconsistent, or if the CLEC believes the information is inaccurate. Qwest will provide the raw loop information to the CLEC within 48 hours.

*Does Qwest perform an MLT on line-shared loops during provisioning? If not, how does Qwest determine, before provisioning the loop, whether the loop is able to carry data traffic without repair?*

Qwest does not run an MLT on line shared loop orders during provisioning. As Qwest stated in its Qwest II Reply Declaration, there is no need for Qwest to run MLT on line shared loop orders and doing so would be inconsistent with CLECs’ requests for a quick provisioning process for line shared loop orders and with the current pricing structure for line shared loops:

As a final note, the process improvements that Qwest implemented for line sharing negates any perceived need for a pre-delivery [MLT] on line sharing orders. MLT on line shared loops is therefore unnecessary; it is also an inappropriate request. Line sharing is a non-designed service, which means that both the pricing and the three-day installation interval are based on a simple, quick installation process. When Qwest developed its line sharing offering, CLECs’ main concern was that they be able to get the product quickly.

Performing an MLT on line sharing orders would add time and expense for Qwest – possibly resulting in a price increase for the product – with very little incremental benefit for CLECs.<sup>1</sup>

Because the voice frequency already is available on the loop, MLT results during line shared loop provisioning will provide negligible information and add complexity to a non-complex process. Additionally, faults identified through a MLT performed during provisioning processes would most likely have caused degradation to the voice frequency and have generated a trouble report from the end user customer prior to line shared loop being provisioned. Qwest performs testing during provisioning to assure quality of the central office wiring and loop.

In order to discuss the quality assurance activities performed by Qwest during provisioning, it is important to note that Qwest has two provisioning process paths. The designed flow is a “complex” services flow that accommodates manual intervention in order to test the circuit, for example. The non-designed (“POTS”) process is designed from a systems perspective for “flow through” with little manual intervention and little opportunity for testing. Typically, non-designed POTS provisioning is performed with little testing prior to completion whereas designed circuits, such as analog loops, undergo a battery of tests to ensure that circuit integrity and specified transmission parameters are met. Line shared loops follow a non-design process path because, from the beginning of line sharing, CLECs desired short intervals and low cost.

Qwest performs quality assurance testing on two aspects of line shared loops during provisioning. First, central office wiring is tested to assure a viable data path exists between the physical demarcation with the CLEC and the loop. This test today is performed using an LSVT test set. Qwest also assures in its line shared loop provisioning process that there are no load coils on the loop by performing a load coil test prior to completing the service order. Additionally, as an additional step to assure line shared loops are properly provisioned, beginning in the 1st Quarter of 2003, Qwest will perform synchronization/router testing for requesting CLECs which will test the physical layer of the transmission path between Qwest’s Main Distribution

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<sup>1</sup> Qwest II Reply Declaration of Karen Stewart, ¶ 43.

Frame (MDF) and CLEC DSLAM. This test, while performed in a non-designed flow, will literally synchronize data between a Qwest DSL test set and the CLEC DSLAM. If the router test results in a failed data synchronization, the order will be placed in jeopardy status until the fault is isolated and corrected by the responsible party in the provisioning process without the need for repair.

In summary, while Qwest does not perform an MLT during line shared loop provisioning, Qwest does perform steps to assure the CLEC-provided data traffic has a viable physical transmission path before the order is completed during provisioning. Because the voice frequency is presumably working (Qwest would receive a trouble report for the voice service if it was not), an MLT for line shared loop is unnecessary.

*Does Qwest use a MALT process during the refresh process?*

Yes. Qwest has previously described the process it uses to refresh information in the LQDB in the following places in the record:

- Qwest I OSS Reply Declaration at ¶ 46;
- Qwest II OSS Reply Declaration at ¶¶ 46, 50-52, 75;
- Qwest 07/10/02 Ex Parte – Tab 10;
- Qwest III OSS Reply Declaration at ¶¶ 37, 41-42.

*Why doesn't Qwest update the LQDB with MLT-generated loop length information discovered during the MLT as part of the provisioning or maintenance and repair processes? Is this information for a particular loop more accurate than MLT-generated loop length information provided through the MALT process?*

Qwest currently does not have the ability to add the results of individual MLT tests run during the provisioning or maintenance and repair processes to the LQDB. Qwest researched the feasibility and cost associated with capturing such MLT distance information and then posting this information in the RLDT. Qwest determined that this effort would be cost prohibitive. Estimates for modification of MLT, the RLDT and the LQDB would exceed \$4 million. In light of the fact that, as noted above, 93.7% of all loops in the LQDB contain actual loop length information from engineering records, and 96% of loops in the LQDB contain either actual length information or MLT-generated loop length, or both, this expense is unnecessary. Further, Qwest's experience is that MLT-generated loop length

information is not significantly different than the loop length information generated through the MALT process.

*Is the information in WFA accessible to CLECs?*

Through CEMR and EB-TA, CLECS have access to certain repair-related screens, or views, within WFA. Specifically, CLECs can view the trouble report log (OSSLOG) screen that provides CLECs with a minute by minute view of technician entries while performing repair activities. CLECs also have access to the circuit history (OSSCHI) screen that provides repair history at a higher level than the OSSLOG screen for the specified circuit. Neither of these WFA screens contain the MLT information that is pasted into WFA during unbundled loop "hot cuts" by the QCCC. However, to be clear, no loop qualification information is retained in the WFA notes. Additionally, any MLT information that is captured in WFA is not populated into other back office systems. That is, it is retained as a record of the loop conversation transaction only.

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The twenty-page limit does not apply to this filing.

Respectfully submitted,

*Hancee Hancee*

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