



EX PARTE (LATE FILED)

Qwest
1020 Nineteenth Street NW, Suite 700
Washington, DC 20036
Phone 202.429.3120
Facsimile 202.293.0561

Melissa E. Newman
Vice President-Federal Regulatory

RECEIVED

May 30C, 2003

MAY 30 2003

Federal Communications Commission
Office of Secretary

EX PARTE

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

ORIGINAL
OFFICE

REDACTED FOR PUBLIC INSPECTION

Re: WC Docket No. 03-90 - Application by Qwest Communications International Inc. for Authority to Provide In-Region InterLATA Services in the State of Minnesota

Dear Ms. Dortch:

Representatives of Qwest Communications International Inc. ("Qwest") met with Commission staff earlier today to provide an update on the status of CLEC reject rates in the Qwest region. The meeting took place via teleconference and was attended by me, Loretta Huff, Dan Poole and Chris Viveros of Qwest, Linda Oliver and Yaron Dori of Hogan & Hartson (representing Qwest), and Gail Cohen, Bill Dever and Jeff Tignor of the Commission. The information conveyed by Qwest to Commission staff during the meeting is included below, along with additional information addressing other staff questions on the subject.

CLEC-Specific Reject Rates for April 2003

In previous *ex parte* filings, Qwest provided Commission staff with region-wide CLEC-specific reject rates under PID PO-4 from September 2002 through March 2003,¹ and for conversion-as-specified Resale POTS ("Resale") and UNE-P POTS ("UNE-P") LSRs submitted via EDI from November 2002 through March 2003.² To ensure that the record in this proceeding remains current, Qwest is submitting updates to the reject rate data previously provided. Specifically, Confidential Attachment A to this filing contains CLEC-specific reject

¹ See Qwest Ex Parte, WC Docket No. 03-90, April 22A, 2003 ("Qwest April 22A Ex Parte") at Confidential Attachment A; see also Qwest Ex Parte, WC Docket No. 03-90, April 30B, 2003 ("Qwest April 30B Ex Parte") (refiling Confidential Attachment A to the Qwest April 22A Ex Parte). Confidential Attachment A in these filings also contained CLEC-specific flow-through rates under PID PO-2.

² See Qwest Ex Parte, WC Docket No. 03-90, May 14A, 2003 at Confidential Spreadsheet.

at 2

rate data under PO-4 for April 2003, and Confidential Attachment B contains CLEC-specific reject rate data for conversion-as-specified Resale and UNE-P LSRs for April 2003.

Confidential Attachments A and B, both separately and together, demonstrate that CLECs are capable of achieving low reject rates when submitting LSRs using Qwest's OSS.³ For instance, Confidential Attachment A demonstrates that, based on RSIDs (unique CLEC identifiers), six CLECs that individually submitted over 1000 LSRs (each) via EDI in April – [***

***] – achieved overall reject rates under PO-4B that were better than or within the 27% to 34% range demonstrated in other Section 271 filings approved by the Commission.⁴ Confidential Attachment A demonstrates that these six CLECs achieved auto-reject rates ranging from 5.19% to 24.48% under PO-4B-2 and manual reject rates ranging from 0.85% to 6.23% under PO-4B-1 in April.⁵

The data in Confidential Attachment B – which contains CLEC-specific reject rates for conversion-as-specified Resale and UNE-P LSRs in April – further demonstrates that CLECs are capable of achieving low reject rates using Qwest's OSS.⁶ For example, [***
], which achieved a combined (auto-and manual) reject rate of between 5% and 14% from November 2002 through March 2003, achieved a combined reject rate of 8% for conversion-as-specified Resale and UNE-P LSRs in April. Another CLEC, [
***], which submitted the second highest volume of conversion-as-specified Resale and UNE-P LSRs in April, also continued to maintain its level of reject rates within the range demonstrated in other Section 271 filings approved by the Commission, posting a combined reject rate of 26% that month.

³ Confidential Attachment A in this filing also contains CLEC-specific flow-through rates under PID PO-2 for April 2003.

⁴ See, e.g., *Qwest III Order* at ¶ 89, n.316, citing *Bell Atlantic New York Order*, 15 FCC Rcd 3953, 4044, n.552 (1999). One of these CLECs – [***
] – submitted the second highest number of LSRs ([
***]) of all CLECs in April and achieved an auto reject rate of 16.26% and a manual reject rate of 6.23% that month. See Confidential Attachment A. Note that 7,309 rejected LSRs appear in the "Unknown" category in Confidential Attachment A – which means that CLECs submitted those LSR with invalid CLEC identifiers. See *id.*

⁵ See Confidential Attachment A at PO-4B-1 and PO-4B-2. In fact, the Wholesale aggregate manual reject rate was only 3.56%; of the 24 CLEC RSIDs for which manual rejects were possible under PO-4B-1, 21 experienced a manual reject rate below 6.04%, and only three had higher manual reject rates, ranging from 8.9% to 12%.

⁶ Like the data in the Qwest May 14A Ex Parte, the data in Confidential Attachment B include rejected LSRs that are not eligible for inclusion under PO-4 based on the PID definition agreed to by Qwest and the CLECs. See Qwest Service Performance Indicator Definitions, 14-State 271 PID Version 5.0, June 26, 2003, at 13, available at www.qwest.com/wholesale/downloads/2002/020826/14State271WkgPIDver5.0-26Jun021.pdf. As a result, the data reported in Confidential Attachment B includes rejected LSRs that may not otherwise be counted in Qwest's official CLEC-specific PO-4 results. This is why Confidential Attachment A indicates that [***
] manual reject rate under PO-4B-1 was 8.90% in April, and Confidential Attachment B indicates that [
] manual reject rate for conversion-as-specified Resale and UNE-P LSRs was higher, 27%. The primary error message accounting for this difference was the product and service description on certain [
***] LSRs that prevented Qwest technicians from being able to determine which USOCs or FIDs were required. This error message is not counted in PO-4B-1 results pursuant to the negotiated business rules for that PID.

Notably, both [***] and [***] were able to achieve these reject rates while submitting the same type of conversion-as-specified Resale and UNE-P LSRs that other CLECs have claimed cause them higher reject rates. More generally, the six CLECs cited above have been using the same EDI release – version 10.01 – as those CLECs that have experienced higher reject rates. This suggests that it is CLEC activity, not Qwest’s systems (which are a constant among CLECs) that is responsible for the difference in reject rates among CLECs.

In helping CLECs troubleshoot their systems, Qwest occasionally obtains some insight into what causes certain CLECs to experience high reject rates. As a general matter, however, while Qwest can determine why a given CLEC’s LSRs are being rejected by the system, Qwest cannot determine what caused particular errors to be made by the CLEC on its side of the interface. This is because Qwest does not have visibility into the CLEC side of the interface or into CLEC operations, and Qwest does not have the ability to dictate CLEC activity. Indeed, the Commission has explicitly recognized that high reject rates among certain CLECs may not be the result of Bell Operating Company (“BOC”) action.⁷

Any number of factors may be responsible for a CLEC’s high reject rate, including CLEC system or coding errors, human error, insufficient training of order entry personnel by CLECs, and a failure to follow documentation correctly. The vast majority of CLECs submitting LSRs through EDI over the past several months have been doing so using IMA release 10.01, which has been materially stable – meaning Qwest has not modified it in any way that would cause reject rates under PO-4 to vary significantly – since late August, 2002.⁸ Qwest’s IMA 11.01 point release also has been stable since its introduction in mid-January, 2003. Nevertheless, during these time periods, monthly reject rates among CLECs – and even for the same CLEC over several months – have varied. This suggests that it is CLEC activity, not Qwest’s OSS, that contributes to the wide range of reject rates among CLECs. Qwest has worked – and will continue to work – with CLECs that experience high reject rates in an effort to help them reduce their reject rates.⁹ But, given that many CLECs have been able to successfully submit the same types of LSRs that have been rejected for other CLECs, Qwest does not believe that its OSS or EDI documentation are the root cause of these rejects.

Additional Information on [***] Reject Rates

As part of its review of CLEC reject rates, Qwest analyzed [***] LSR submissions and rejects from January 1 through May 17, 2003. Qwest reviewed these LSRs for common reject reasons and also examined other data relating to multiple LSR

⁷ See, e.g., *Qwest III Order* at ¶ 89; *Georgia/Louisiana Order* at ¶ 142; *Bell Atlantic New York Order* at ¶ 175.

⁸ In keeping with Qwest’s common practice for point releases, all CLECs using release 10.0 were automatically migrated to release 10.01 when it was deployed. EDI-impacting changes are not included in point releases.

⁹ See, e.g., Confidential Reply Exh. LN-1 (Qwest April 3, 2003, Ex Parte), WC Docket No. 03-11, at 3-4.

submissions for individual account orders. Qwest's findings in connection with this analysis can be found in Confidential Attachment D to this filing.

Reject Rates Under IMA 12.0

On April 7, 2003, Qwest began to provide CLECs with migrate-by-telephone number and conversion-as-specified functionality through the implementation of IMA version 12.0. To date, the only CLEC to migrate to release 12.0 via an EDI interface is [***], but other CLECs are in the process of testing this release and many plan to migrate within the next 30 days.¹⁰

[***] began submitting LSRs using EDI release 12.0 on April 26, 2003. The preliminary results in May show that [***] auto-reject rate under PO-4B-2 from May 1 through 28 was [***] and that its manual reject rate under PO-4B-1 was [***] during this period.¹¹ [***] auto-reject rate generally declined from week-to-week during this period.¹² Qwest believes this is in part due to the fact that migrate-by-TN functionality automatically applies to all CLECs using EDI release 12.0 (Qwest has observed that certain address validation-based reject messages are no longer being received by [***]). Qwest's review of [***] LSRs submitted during this period indicates that [***] did not often appear to be using the conversion-as-specified functionality when submitting conversion orders. Had [***] used that functionality, it is likely that its auto-reject rate would have been even lower, as [***] reject messages that were received during the first week (April 27 through May 3), [***] during the second week (May 4 through May 10), and [***] during the third week (May 10 through May 17) would not have been issued.¹³

* * *

¹⁰ See Confidential Attachment C (Current IMA-EDI Release 12.0 Migration Schedule). Confidential Attachment C includes only those CLECs that, to Qwest's knowledge, plan to migrate to IMA-EDI release 12.0.

¹¹ For comparison purposes, [***] April PO-4B-2 (auto-reject) rate was [***] and its PO-4B-1 (manual) reject rate was [***].

¹² A preliminary breakdown of [***] auto-reject data also is available for the first three weeks after [***] migrated to EDI version 12.0. Between April 27 and May 3 of this year, [***] submitted a total of [***] LSRs, of which [***] were auto-rejected. Between May 4 and May 10, [***] submitted a total of [***] LSRs, of which [***] were auto-rejected. Between May 10 and May 17, [***] submitted a total of [***] LSRs, of which [***] were auto-rejected.

¹³ Multiple reject messages may be issued for the same LSR if more than one error exists on that LSR.

Marlene H. Dortch
May 30C, 2003
Page 5

Because Qwest provided the information in this letter at the request of Commission staff, the twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

/s/

Melissa Newman

cc: G. Cohen
W. Dever
J. Tignor
J. Myles
G. Remondino
R. Harsch
B. Harr

rpt_mon	cd_271d	PROD_CD	_NAME_	_LABEL_
3-Apr	PO-2A	LNP	NUM	Numerator of Metric
3-Apr	PO-2A	LNP	DENOM	Denominator of Metric
3-Apr	PO-2A	LNP	RESULT	Metric Result Value
3-Apr	PO-2A	RES2_AGG	NUM	Numerator of Metric
3-Apr	PO-2A	RES2_AGG	DENOM	Denominator of Metric
3-Apr	PO-2A	RES2_AGG	RESULT	Metric Result Value
3-Apr	PO-2A	UBL_AGG	NUM	Numerator of Metric
3-Apr	PO-2A	UBL_AGG	DENOM	Denominator of Metric
3-Apr	PO-2A	UBL_AGG	RESULT	Metric Result Value
3-Apr	PO-2A	UNE_P_POTS	NUM	Numerator of Metric
3-Apr	PO-2A	UNE_P_POTS	DENOM	Denominator of Metric
3-Apr	PO-2A	UNE_P_POTS	RESULT	Metric Result Value
3-Apr	PO-2A-1	LNP	NUM	Numerator of Metric
3-Apr	PO-2A-1	LNP	DENOM	Denominator of Metric
3-Apr	PO-2A-1	LNP	RESULT	Metric Result Value
3-Apr	PO-2A-1	RES2_AGG	NUM	Numerator of Metric
3-Apr	PO-2A-1	RES2_AGG	DENOM	Denominator of Metric
3-Apr	PO-2A-1	RES2_AGG	RESULT	Metric Result Value
3-Apr	PO-2A-1	UBL_AGG	NUM	Numerator of Metric
3-Apr	PO-2A-1	UBL_AGG	DENOM	Denominator of Metric
3-Apr	PO-2A-1	UBL_AGG	RESULT	Metric Result Value
3-Apr	PO-2A-1	UNE_P_POTS	NUM	Numerator of Metric
3-Apr	PO-2A-1	UNE_P_POTS	DENOM	Denominator of Metric
3-Apr	PO-2A-1	UNE_P_POTS	RESULT	Metric Result Value
3-Apr	PO-2A-2	LNP	NUM	Numerator of Metric
3-Apr	PO-2A-2	LNP	DENOM	Denominator of Metric
3-Apr	PO-2A-2	LNP	RESULT	Metric Result Value
3-Apr	PO-2A-2	RES2_AGG	NUM	Numerator of Metric
3-Apr	PO-2A-2	RES2_AGG	DENOM	Denominator of Metric
3-Apr	PO-2A-2	RES2_AGG	RESULT	Metric Result Value
3-Apr	PO-2A-2	UBL_AGG	NUM	Numerator of Metric
3-Apr	PO-2A-2	UBL_AGG	DENOM	Denominator of Metric
3-Apr	PO-2A-2	UBL_AGG	RESULT	Metric Result Value
3-Apr	PO-2A-2	UNE_P_POTS	NUM	Numerator of Metric
3-Apr	PO-2A-2	UNE_P_POTS	DENOM	Denominator of Metric
3-Apr	PO-2A-2	UNE_P_POTS	RESULT	Metric Result Value
3-Apr	PO-2B	LNP	NUM	Numerator of Metric
3-Apr	PO-2B	LNP	DENOM	Denominator of Metric
3-Apr	PO-2B	LNP	RESULT	Metric Result Value
3-Apr	PO-2B	RES2_AGG	NUM	Numerator of Metric
3-Apr	PO-2B	RES2_AGG	DENOM	Denominator of Metric
3-Apr	PO-2B	RES2_AGG	RESULT	Metric Result Value
3-Apr	PO-2B	UBL_AGG	NUM	Numerator of Metric
3-Apr	PO-2B	UBL_AGG	DENOM	Denominator of Metric
3-Apr	PO-2B	UBL_AGG	RESULT	Metric Result Value
3-Apr	PO-2B	UNE_P_POTS	NUM	Numerator of Metric
3-Apr	PO-2B	UNE_P_POTS	DENOM	Denominator of Metric
3-Apr	PO-2B	UNE_P_POTS	RESULT	Metric Result Value
3-Apr	PO-2B-1	LNP	NUM	Numerator of Metric
3-Apr	PO-2B-1	LNP	DENOM	Denominator of Metric

3-Apr PO-2B-1	LNP	RESULT	Metric Result Value
3-Apr PO-2B-1	RES2_AGG	NUM	Numerator of Metric
3-Apr PO-2B-1	RES2_AGG	DENOM	Denominator of Metric
3-Apr PO-2B-1	RES2_AGG	RESULT	Metric Result Value
3-Apr PO-2B-1	UBL_AGG	NUM	Numerator of Metric
3-Apr PO-2B-1	UBL_AGG	DENOM	Denominator of Metric
3-Apr PO-2B-1	UBL_AGG	RESULT	Metric Result Value
3-Apr PO-2B-1	UNE_P_POTS	NUM	Numerator of Metric
3-Apr PO-2B-1	UNE_P_POTS	DENOM	Denominator of Metric
3-Apr PO-2B-1	UNE_P_POTS	RESULT	Metric Result Value
3-Apr PO-2B-2	LNP	NUM	Numerator of Metric
3-Apr PO-2B-2	LNP	DENOM	Denominator of Metric
3-Apr PO-2B-2	LNP	RESULT	Metric Result Value
3-Apr PO-2B-2	RES2_AGG	NUM	Numerator of Metric
3-Apr PO-2B-2	RES2_AGG	DENOM	Denominator of Metric
3-Apr PO-2B-2	RES2_AGG	RESULT	Metric Result Value
3-Apr PO-2B-2	UBL_AGG	NUM	Numerator of Metric
3-Apr PO-2B-2	UBL_AGG	DENOM	Denominator of Metric
3-Apr PO-2B-2	UBL_AGG	RESULT	Metric Result Value
3-Apr PO-2B-2	UNE_P_POTS	NUM	Numerator of Metric
3-Apr PO-2B-2	UNE_P_POTS	DENOM	Denominator of Metric
3-Apr PO-2B-2	UNE_P_POTS	RESULT	Metric Result Value
3-Apr PO-4A-1	CRM_AGG	NUM	Numerator of Metric
3-Apr PO-4A-1	CRM_AGG	DENOM	Denominator of Metric
3-Apr PO-4A-1	CRM_AGG	RESULT	Metric Result Value
3-Apr PO-4A-2	CRM_AGG	NUM	Numerator of Metric
3-Apr PO-4A-2	CRM_AGG	DENOM	Denominator of Metric
3-Apr PO-4A-2	CRM_AGG	RESULT	Metric Result Value
3-Apr PO-4B-1	CRM_AGG	NUM	Numerator of Metric
3-Apr PO-4B-1	CRM_AGG	DENOM	Denominator of Metric
3-Apr PO-4B-1	CRM_AGG	RESULT	Metric Result Value
3-Apr PO-4B-2	CRM_AGG	NUM	Numerator of Metric
3-Apr PO-4B-2	CRM_AGG	DENOM	Denominator of Metric
3-Apr PO-4B-2	CRM_AGG	RESULT	Metric Result Value
3-Apr PO-4C	CRM_AGG	NUM	Numerator of Metric
3-Apr PO-4C	CRM_AGG	DENOM	Denominator of Metric
3-Apr PO-4C	CRM_AGG	RESULT	Metric Result Value

UNE-P POTS and Resale POTS Conversion-as-Specified LSRs Submitted via EDI Region-Wide November 2002 - April 2003									
Month	LSRs	Auto Rejects	% Auto	Manual Rejects	% Manual	Total Rejects	% Rejects	Success	% Success
November	10,411	1,956	19%	572	5%	2,528	24%	7,883	76%
December	13,860	1,638	12%	775	6%	2,413	17%	11,447	83%
January	9,122	1,452	16%	676	7%	2,128	23%	6,994	77%
February	43,574	22,788	52%	2,088	5%	24,876	57%	18,698	43%
March	105,805	59,415	56%	7,141	7%	66,556	63%	39,249	37%
April	106,190	40,694	38%	9,902	9%	50,596	48%	55,594	52%
Grand Total	288,962	127,943	44%	21,154	7%	149,097	52%	139,865	48%
Results for all CLECs (excluding ***									
Month	LSRs	Auto Rejects	% Auto	Manual Rejects	% Manual	Total Rejects	% Rejects	Success	% Success
November									
December									
January									
February									
March									
April									
Grand Total									
CLEC Names									

UNE-P POTS and Resale POTS Conversion-as-Specified LSRs Submitted via EDI Region-Wide April 2003

Month: Apr 03

CLEC	Product	LSRs	Auto Rejects	% Auto	Manual Rejects	% Manual	Total Rejects	% Rejects	Success	% Success
	Resale POTS UNE-P POTS									
Total										
	Resale POTS UNE-P POTS									
Total										
	Resale POTS UNE-P POTS									
Total										
	Resale POTS UNE-P POTS									
Total										
	Resale POTS UNE-P POTS									
Total										
	Resale POTS UNE-P POTS									
Total										
	Resale POTS UNE-P POTS									
Total										
	Resale POTS UNE-P POTS									
Total										
Total Resale POTS		2323	558	24%	181	8%	739	32%	1584	68%
Total UNE-P POTS		103867	40136	39%	9721	9%	49857	48%	54010	52%
Month Total		106190	40694	38%	9902	9%	50596	48%	55594	52%

ADDITIONAL INFORMATION ON [*** **] REJECT RATES

[*** REDACTED ***]