-----Original Message-----
From: Clauson, Karen L.
Sent: Tuesday, September 16, 2003 9:45 AM
To: 'Jodi.Smith@usdoj.gov'
Cc: Oxley, J. Jeffery
Subject: additional issues

Peter Gray had left a message asking about any other issues. I left him a message indicating that, given the fact that the FCC has already approved Qwest in 13 other states and limited resources, we may not be filing comments. That does not mean that Eschelon does not object to 271 approval, but Eschelon has to be realistic about the likely outcome in a resource short world. I don't have Peter's email address. Perhaps you could forward this to him, in case he has questions

I also indicated in my message that Eschelon does have other issues:

1. OSS - essentially the same issues as MCI (see enclosed letter).

a. Reject Rates (2nd paragraph): Eschelon uses EDI for loop orders and GUI for off-net orders. We checked a recent week, and we also had approximately 44% reject rates for EDI. For the GUI, there is an up-front edit so there is no count. We do get many of these.

b. MCI #1 - Insufficient documentation to require Qwest to correct software defects impacting LSR processing within specified timeframes. This is a significant issue for us. On 8/29/03, the CLECs (including Eschelon) voted unanimously in favor of MCI's proposed language, but Qwest voted no. In CMP, Qwest has essentially a veto power. This is a significant issue for CLECs, but Qwest has made no commitment to do anything about it.

c. MCI#2 - Migrate by TN - (This issue is mentioned in paragraph 23, p. 8, lines 11013 of the Staff's AZ 271 Proposed Order, recently adopted by the AZ Commission. Eschelon also asked for this capability. Eschelon has not implemented use of it yet; it has observed the problems MCI is having with it. When Qwest implements a systems change, it should have the processes in place to account for the change. In the Proposed (now adopted Order), the Staff states that Qwest has verified this issue has been resolved in CMP, but that is not the case.

d. MCI #3 - Migrate as specified - Eschelon asked for a solution to the "mapping" problem described in paragraph 24, p. 8, lines 9-11, in the AZ 271 case in September of 2000. Although Qwest said it was finally delivering an "end state" view, Qwest did not do so for features that drive blocking and hunting requests. These are in demand, needed features. Without these, there really is no true end state (i.e., when the provisioner does not have to look at was previously on the line but instead can deal with what is being requested). In the Proposed (now adopted Order), the Staff states that Qwest has verified this issue has been resolved in CMP, but that is not the case.

e. MCI #4 - Reason for high reject rates - A check of recent loop (EDI) orders showed that approximately 1/3 of the rejects were due to the service address validation issue. For the GUI, there is an up-front edit so there is no count.

f. MCI #5 - Multiple CSRs for subsequent order activity - Eschelon uses EDI for loops at this time, and there isn't much subsequent order activity with loops. With the GUI, the issue is somewhat different, although CLECs do still have to select a CSR from multiples. Eschelon will have this same problem for its off-net orders once it moves to EDI.

2. PO-20 (comparison of service orders to LSRs for service order errors): Service order errors remain a significant problem. As a result of CRs submitted by Eschelon to CMP, Qwest has finally documented many of its processes requiring manual handling. In its current form, however, PO-20 is worse than having no measure at all. Qwest has created an exception (for "CFLAGs" and later "PIA") that swallows the rule. If there are ten errors on a service order, only one of which is associated with a CFLAG, Qwest will count the error as accurate, despite the nine other errors. This will result in masking the problem, because Qwest's results will show positive performance when in fact service order errors exist that are not being counted.

3. Other complaints/issues/DUF: The FCC said (in its Order, 02-314, 12/20/02, paragraph 130 & note 481) that Eschelon could pursue its issues against Qwest in other settings/through dispute resolution, even if the FCC does not recognize the issue as a 271 issue. [Eschelon has disputes that are not yet formal complaints but may become complaints. (For example, Eschelon has a dispute pending with Qwest in the amount of approx. $700,000 relating to the SS7 issues that are the subject of several complaints against Qwest. (See separate email.)]

a. Eschelon has complaints pending against Qwest in federal court and before state commissions. Other CLECs also have filed complaints against Qwest. (I'll forward an email listing matters by Eschelon and other CLECs separately).

b. For example, Eschelon has a complaint pending in federal court against Qwest on the DUF/missing minutes issue. (Copy enclosed in separate email on pending matters.)

c. PrairieWave (fka McLeodUSA) has submitted a settlement agreement for approval in some of its states. The motion to approve the settlement agreement states that "The Agreement resolves the dispute in this Docket exclusively between Qwest and PrairieWave." At least one of the terms, however, is an ongoing obligation that Eschelon and perhaps other CLECs would like to take advantage of as well. Eschelon believes that Qwest's agreement to provide an "additive" to PrairieWave confirms Eschelon's long-standing assertion that Qwest's usage has been understated. Eschelon sent an email (excerpt copied below) to Qwest (Nancy Batz) on 9/4 asking whether Qwest will also provide the additive to Eschelon/other CLECs, but Qwest has not responded.

From 9/4 Eschelon email to Qwest:

> "I was reviewing the Settlement Agreement between PrairieWave Communications Inc. vs Qwest Corporation [MN PUC Docket No. P-421-CO2-1439 and South Dakota PUC Docket No. CT02-039], and I noticed part of the settlement related to TUT record processing.

Specifically, in Exhibit A, Steps to Assign Local/Toll Jurisdiction, Section 4 Determine Toll MOU to be billed to Qwest, it states:

"a. Total Toll MOU billed to Qwest will be based on the MOU recorded in the Qwest Terminating Usage Tracking (TUT) reports or from Clearinghouse for Access Records Distribution System (CARDS), depending on which is available.

b. An ILEC Additive will be added to the TUT MOU to account for the MOU that are PIC'd to Qwest by customers who reside in non-Qwest exchanges. The additive in MN is 52%. This additive is subject to periodic change to reflect approximations of ILEC originated/Qwest PIC'd calls."

Qwest provides Eschelon with a TUT usage spreadsheet for Qwest carried intraLATA toll traffic terminating to lines served by Eschelon switches. However, Eschelon has always believed this usage is understated and have advised Qwest of this belief in the past.

Can you confirm the following:

1. Does Eschelon receive this "additive" for Qwest carried intraLATA toll traffic originated by non-Qwest local exchange customers? If not, please explain why. If so, please advise Eschelon what this additive is in each state for Eschelon traffic. Also, if so, why isn't this additive reflected on the toll usage report you provide.

2. For UNE-P terminating traffic, is Eschelon receiving usage records for Qwest carried intraLATA toll trafic originated by non-Qwest local exchange customers and terminating to an Eschelon UNE-P line?"

Please call me if you have any questions.

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

MCI OSS letter.

Thomas F. Dixon
Senior Attorney
Western Public Policy
707 17th Street
Suite 4200
Denver, CO 80202
303 390 6206
Fax 303 390 6333
888 475 7218
Thomas.F.Dixon@wcom.com

August 26, 2003

William Mundell, Commissioner
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Re: Docket No. T-00000A-97-0238, Qwest's 271 Application

Dear Commissioner Mundell:

I have been advised by the Commission Staff that during the open meeting held August 21, 2003, you asked if anyone knew of any problems that had arisen with Qwest Corporation's ("Qwest") operation support systems ("OSS") in other states since its 271 applications were approved.

MCI's overall mass market (consumer) local exchange carrier ("LEC") reject rate for orders submitted was 15.4% for all Bell operating companies combined for the week ended August 15, 2003. The Qwest reject rate dropped below 30% for the first time that week to 28.4%. The overall small business market LEC reject rate was at 41.3%. The Qwest reject rate for small business orders was 40.7%. Below is a summary of our most recent experiences with Qwest's OSS and OSS documentation that impacts rejection of our orders in Qwest's OSS.

1. Intermediated Access ("IMA") is the method provided by Qwest for CLECs to access Qwest's OSS and process local orders. IMA solely impacts CLECs ordering practices and is not used by Qwest's retail side of its business. The current Change Management Process ("CMP") document lacks sufficient language to require that within specific timeframes Qwest correct software defects when the defect impacts CLECs' abilities to process local service requests ("LSRs"). Without such language, CLECs have no guarantees from Qwest that software defects will be fixed in a timely manner. A defect in the software means the system is not working in accordance with Qwest's published business rules. In turn, when a defect is identified, it is inappropriate for Qwest to simply update the document accordingly because it then places the burden on CLECs to adjust coding they implemented based on the prior documented business rules. In April 2003, MCI initiated a change request through CMP to provide such language that will be subject to a unanimous vote. It is anticipated that Qwest will reject the change request based upon attempts to negotiate a resolution through the CMPO process.

2. Qwest must synch up system edits with those being performed manually by their Interconnect Service Center ("ISC") personnel. Qwest implemented a system change request that would allow migration order types (UNE-P migrations) to be processed by entering the telephone number and house number only. The intent of the "migrate by TN" change request was that less information would be required on the order than was required prior to the change that would result in less rejects for CLECs. After implementation, MCI saw a significant increase in migration order manual rejects and noted that the ISC personnel were editing more than what was required. A process change was implemented by Qwest after MCI provided examples of the out of synch condition between systems/manual processing of LSRs. A process must be established by Qwest to synch up system and manual edit processing. Qwest has agreed that the process is necessary, but there is no formal commitment to begin.

3. When Qwest implemented what was expected to be Industry Standard "migrate as specified" ordering requirements, it neglected to provide "end-state" view requirements for features that drive blocking and hunting requests. In accordance with a Z-tel change request, Z-Tel requested "the ability to migrate customers as specified without having to list changes to the customer's current feature set." Qwest continues to require a distinction be made between what exists and what is changing for blocking and hunting features.

4. When Qwest system edits are not documented or documented incorrectly, CLEC local orders are either rejected and/or incorrectly provisioned. MCI recently discovered a Qwest back-end system edit that is attempting to validate complete address information that is not required under Qwest published business rules. The edit requires address information be an exact match to what is listed in Qwest PREMIS database and can be retrieved via a preorder service address validation ("SAV") query. Not only are the address fields not supposed to be edited, but CLECs are not and should not be required to perform an SAV preorder query because it increases order processing timeframes. Moreover, an update to documentation would place the burden on CLECs to make system changes to accommodate what should have been documented correctly in the first place.

Another significant issue that can result when documentation is not adequately reflecting how the system is working is requested end user services are not provisioned. Qwest recently determined that blocking features are required to be provided in alphabetical order because that is how the system "expects" blocking features. If blocking features are not provided in alphabetical order, Qwest may only provision those that are provided for in alphabetical order, thus an out of synch condition may exist between what was requested and what Qwest provisioned. At this time the impact of this problem is unknown but Qwest was requested to provide analysis between LSR requests and Service Orders provisioned to determine the impact.

5. Qwest cannot provide to CLECs the most current customer service record ("CSR") because it maintains retail CSRs as "live" until the end user's bill is rendered, paid and posted to Qwest billing system. When a CLEC migrates a local customer,

Qwest houses two active customer service records. One with Qwest retail information and one that is generated for the CLEC when the customer migrates. The IMA system determines which CSR is valid per order by the use of a customer code identifier internally tracked by Qwest. If the CLEC is requested by the end-user to change and/or correct what was provisioned, CLECs must distinguish which CSR is the customers and provide the valid customer code or the order will reject. MCI initiated a change request to eliminate multiple match conditions (SCR102202-01 - Customer Service Record) on October 22, 2002. While Qwest implemented changes to reduce multiple CSR scenarios, it did not address the intent of the original request which referenced the largest impact to CLECs. That is post migration when CLECs are most impacted by multiple CSR conditions 100% of the time until Qwest rendered, billed and posted the retail end user's final bill. Thus, MCI continues to see a large volume of rejects that are a result of multiple match CSR conditions.

A copy of this letter is being docketed and sent to all parties on the service list and being e-mailed to parties as well.

Sincerely yours,

Thomas F. Dixon