



Qwest
607 14th Street, NW, Suite 950
Washington, DC 20005
Phone 202.429.3121
Fax 202.293.0561

Cronan O'Connell
Vice President-Federal Regulatory

EX PARTE

August 19, 2004

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, DC 20554

Re: In the Matter of Performance Measurements and Standards for Interstate Special Access Services, CC Docket No. 01-321; In the Matter of Section 272(f)(1) Sunset of the BOC Separate Affiliate and Related Requirements, WC Docket No. 02-112; In the Matter of BellSouth Telecommunications Inc. Section 272 Biennial Audit Report, EB Docket No. 03-197; In the Matter of Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended, CC Docket No. 96-149

Dear Ms. Dortch:

On August 18, 2004, Cronan O'Connell, Gregory Smith, Todd Staebell and Cynthia Kalakis, in person, and Paul Johnson, Donald Tolman and Michael Williams, via telephone conference bridge, representing Qwest Communications International Inc. ("Qwest"), met with the following members of the Policy Division of the Wireline Competition, Julie Veach, Michael Carowitz, Brad Koerner and Ben Childers to present Qwest's Access Service Request (ASR) Process. Qwest also responded to a Joint Competitive Industry Group *ex parte* that had been originally filed on June 28, 2004. The attached document reflects Qwest's information presented during the discussions.

In accordance with Commission Rule 47 C.F.R. § 1.49(f), this *ex parte* letter is being filed electronically for inclusion in the public record of the above-referenced proceedings pursuant to Commission Rule 47 C.F.R. § 1.1206(b)(2).

Sincerely,
/s/ Cronan O'Connell

cc:
Michael Carowitz (michael.carowitz@fcc.gov)
Brad Koerner (brad.koerner@fcc.gov)
Ben Childers (ben.childers@fcc.gov)
Julie Veach (julie.veach@fcc.gov)

Attachment



Access Service Request (ASR) Processes Overview

August 18, 2004

Access Service Request (ASR) Ordering & Downstream Processes

- Ordering and Provisioning**
- Maintenance and Repair**

Interexchange Carrier Products

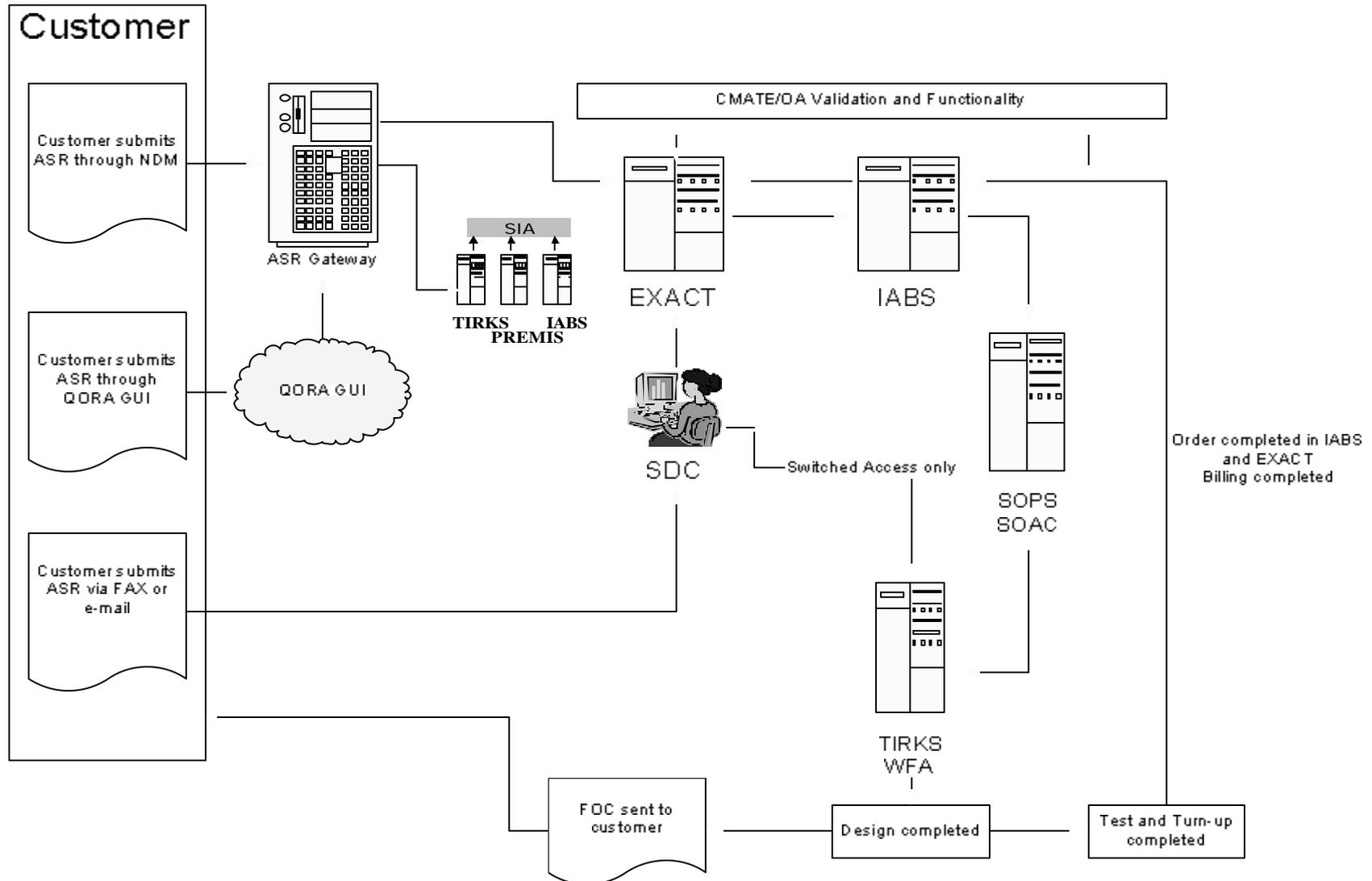
□ **Special Access**

- **DS0, DS1, & DS3**
- **Optical Services**

□ **Switched Access**

- **Feature Group A, B, C & D**

High-Level ASR Order Processing Flow



ASR - Receipt

- **The customer submits the ASR either electronically or manually:**

- **Electronically submitted ASRs** are validated against Qwest systems (TIRKS, IABS, PREMIS) via the SIA interface
 - **The QORA GUI provides validation of key fields, i.e., BAN, CFA, Address, NC-NCI. The customer receives detailed information on the validation and errors. A pre-order validation is also available through QORA**
 - **The NDM provides the same validation and provides the customer with a “match” or “no-match” message on the validation**

- **Manually submitted ASRs** can be faxed or e-mailed in which case the Service Delivery Coordinator (SDC) manually enters into the EXACT system

ASR Validation/Processing

- Once the ASR enters EXACT, the ASR is placed on an SDC's worklist
- The SDC checks the ASR for errors and manually validates items that have fallen-out of the mechanical validation
 - If upon validation, the ASR is found to be invalid, the request is placed in a “pending” status and the customer is notified that a supplement to the ASR is required and that if the supplement is not received within 15 business days from the original Application (APP) date, the ASR is cancelled on the 16th business day
- Once the ASR validation is complete, a service order is created in IABS
- When provisioning is completed, the SDC is notified and the service order is completed in IABS and billing is established

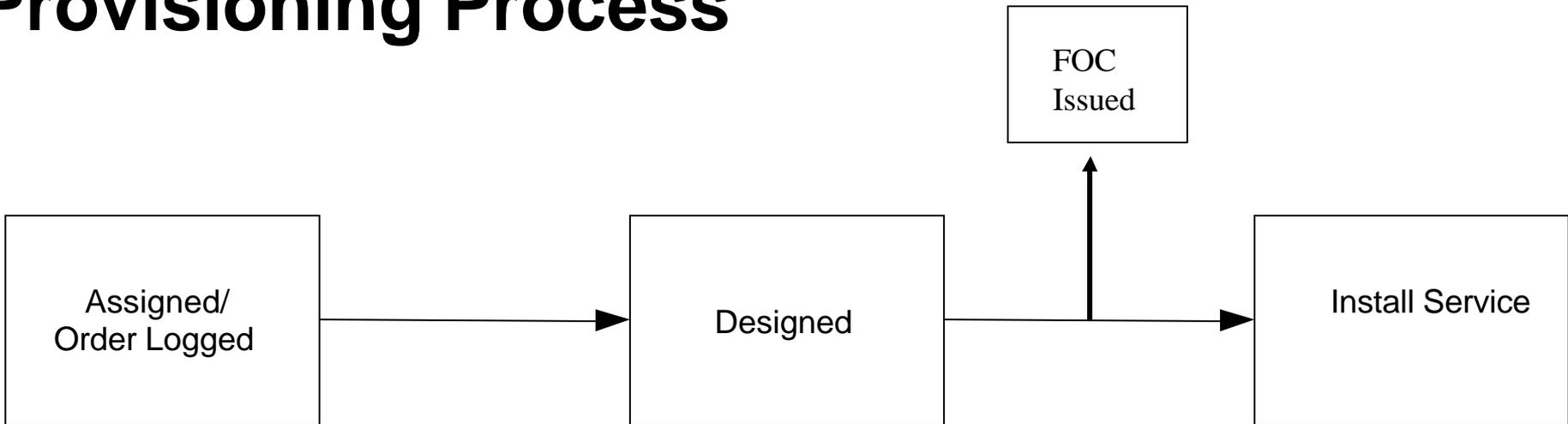
Service Order Intervals

- **The SDC determines the appropriate service interval for the product being ordered and adds the critical dates. If an expedite is requested or the request will be project-managed, the critical dates are adjusted appropriately**
- **Service order intervals are determined by product and are found in the Service Interval Guide for Access Services located on Qwest's website: <http://www.qwest.com/wholesale/guides/sig/index.html>**
- **Intervals for Project-Managed requests are determined on an Individual Case Basis based on the complexity and size of the project. Due dates are coordinated either by a Project Manager or the customer's Service Manager**

Firm Order Confirmation (FOC)

- **Once the ASR is distributed to the downstream network provisioning systems and the service has been designed, a FOC is sent to the customer**
 - **If the ASR was sent to Qwest mechanically the FOC is sent to the customer mechanically through EXACT**
 - **If the ASR was faxed or e-mailed, the FOC is sent to the customer through fax or e-mail**
- **SDCs monitor the ASR to ensure timely FOCs are sent to the customer**
- **If facilities are not available to complete the Design, the order follows the Delayed Order process. A Ready For Service (RFS) date for the required facility is determined by Network. The RFS date + standard interval is then FOC'd to the customer**

Provisioning Process



- **Assign:** Once the order is received and validated, Qwest personnel and systems assigns the local loop facilities needed to establish a facility path between a customer site and serving central office as well as central office switching assignments
- **Design:** Qwest personnel and systems assign additional infrastructure to support requested technical criteria to meet the service request.
 - Trunk assignment and configuration
 - Interoffice facilities
 - Signaling configuration
- **Install Service:** With design complete, Qwest personnel validate, run wire interconnections, switch translations, test, and turn-up service to the customer.

Provisioning: Design

□ Facilities available

- Assigner/Designer uses the systems to assign equipment and facilities to satisfy the order
- First-come-first-served

□ Facilities not available (delayed order)

- Engineer uses the systems to order and construct equipment and facilities needed to satisfy the order
- First-come-first-served

□ Upon successful completion of Assign/Design, the Service Order Processor (SOP) will electronically notify the Work Force Administration (WFA) system

- A FOC is issued to the customer at this point

Provisioning: Service Install

- **WFA consists of three systems**
 - **WFA-Control (WFA-C) systems assign work to the Design Center Technician who has overall control of the order**
 - **WFA-Direct Inward (WFA-DI) system assigns work to Central Office Technicians**
 - **WFA-Direct Outward (WFA-DO) system assigns work to Field Technicians for dispatch**

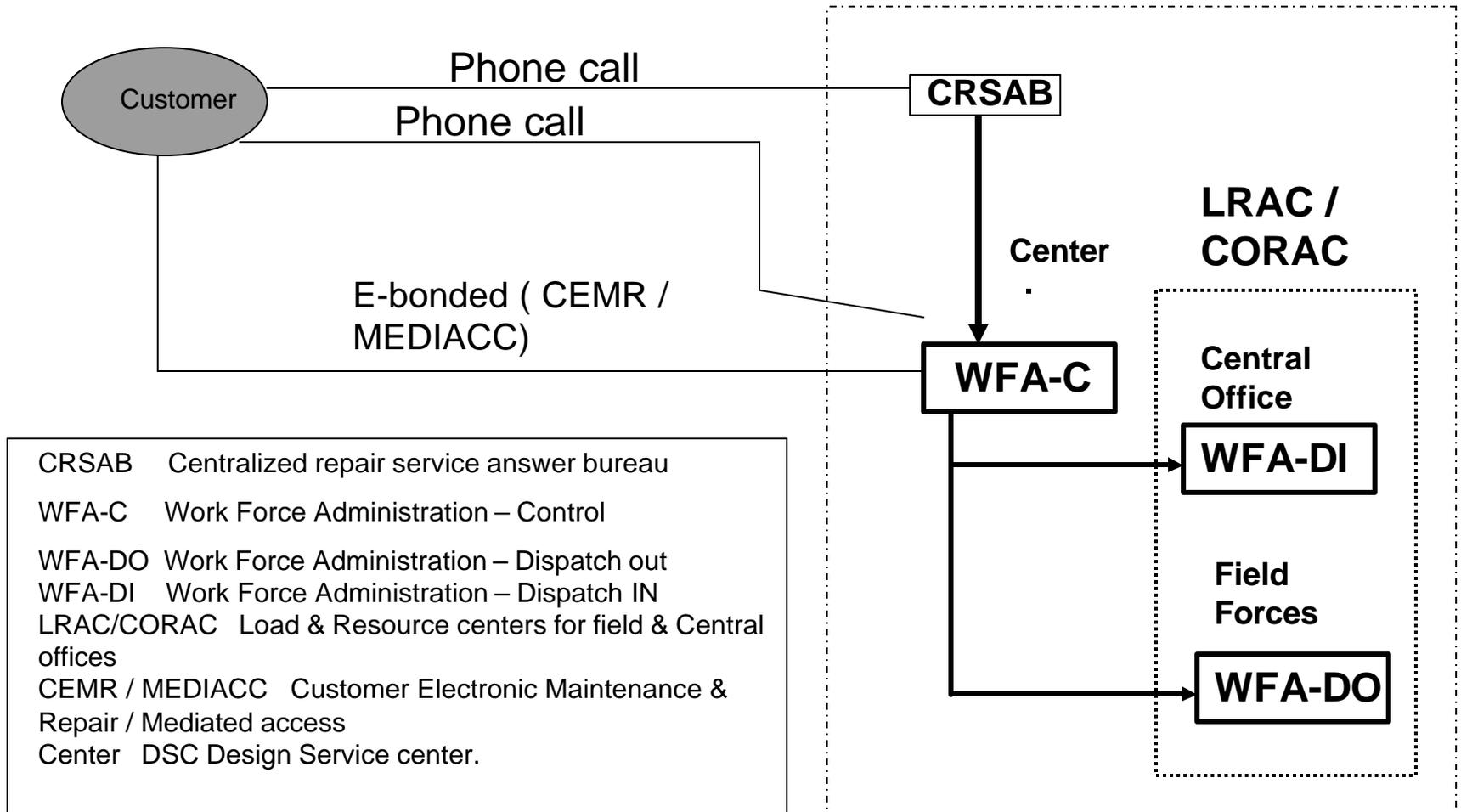
- **Technicians:**
 - **Verify customer readiness and accuracy of service request**
 - **Configure electronics and/or change update software**
 - **Connect facilities**
 - **Test Circuits to insure circuit specifications are met**
 - Includes both independent and joint testing
 - If specifications are not met, Qwest works to resolve problems
 - **Work with customer to obtain acceptance of the service request**

- **When provisioning is completed, the SDC is notified and the service order is completed in IABS and billing is established**

Test and Turn-Up

- **If the customer is not ready for service on the due date, the order is placed in a “customer-not-ready” status for 30 business days**
- **The customer can supplement the order with a new due date any time during this 30 day period as long as the new due date is within 30 business days of the original due date**
- **If at the end of the 30 business day timeframe, a new due date has not been established, the customer has the following two options:**
 - **Cancel the request and pay cancellation charges, if applicable**
 - **Commence billing for the service**
 - The cancellation date or the date that billing is to commence shall be the 30th business day beyond the original service date.
 - The customer's order must be physically completed in order for the customer to accept billing. If the order cannot be physically completed, the order must be canceled and reissued. Physically complete means that facilities are in place and tested to the best of Qwest's ability and ready for customer use..

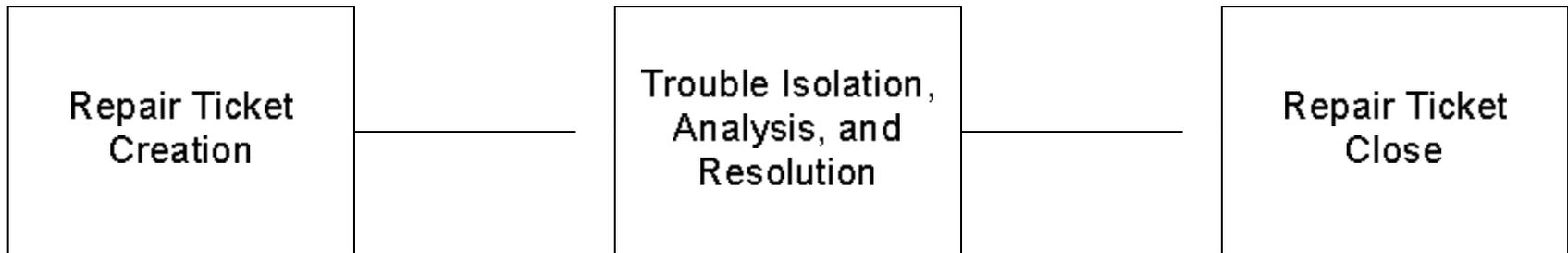
High Level Repair Process



Repair Intervals - As tariffed in FCC 1 Tariff

<input type="checkbox"/> SHNS, SHARP Self healing	1 sec. – 1hour
<input type="checkbox"/> Hicap, TSP DS3PLUS & above	3 Hours
<input type="checkbox"/> 911, DS0	4 Hours
<input type="checkbox"/> Hicap DS1	4 Hours
<input type="checkbox"/> ISDN_P (Primary Rate)	4 Hours
<input type="checkbox"/> ISDN_B (Basic Rate)	8 Hours
<input type="checkbox"/> LIS, FGM	24 Hours
<input type="checkbox"/> ANALOG, OTHER	24 Hours

Repair Process



- Customer determines through testing that trouble is in the Qwest network.**
- Customer contacts Qwest through**
 - **Electronic/mechanized medium**
 - **Phone call**
- Qwest records reported trouble in systems**
- Qwest works to resolve reported trouble**
 - **Isolation trouble**
 - **Analyze trouble**
 - **Corrective action to resolve trouble**
- Qwest works with Customer to insure that trouble is resolved**

Repair: Ticket Creation

- **Customer reports trouble**
 - **Phone the Customer Repair Services Answering Bureau (CRSAB)**
 - **Electronically through Customer Electronic Maintenance and Repair (CEMR)**

- **Either way, the trouble is recorded in WFA-C system. Customer is provided with a ticket number for reference and process tracking**

Repair: Isolation, Analysis, & Resolution

- **Automated systems and equipment attempt to isolate trouble and provide analysis to a Center Technician.**
 - **If automated systems and equipment cannot isolate, then Center Technician manually isolates trouble using systems .**
 - **Isolation often requires several groups to work together, thus work is handed off to these groups.**
 - **Field Technician**
 - **Central Office Technician**
 - **Operations Center Technicians/Technical Support**
- **Technicians use training, experience and test equipment to analyze data to resolve trouble.**
- **Joint testing may be required between Qwest & the customer.**
- **The repair clock may be stopped for customer caused reasons.**
- **Resolution may require repair of equipment or facilities.**

Repair: Closure

- **Closure of Repair request is authorized by customer.**
 - **Repair information is provided to the customer by electronic or manual status updates.**
 - **Trouble and analysis code identifying where and what caused the trouble is recorded in the WFA-C system.**
 - **Customer validates circuit repair through independent testing when Qwest reports it as restored.**
 - **If a trouble condition is not found in the Qwest network, Qwest will return repair disposition information to the customer as 'Test Okay' (TOK) or 'No Trouble Found' (NTF). Customer may challenge the status through testing.**
 - **Actual restoral time is mutually agreed to by Qwest and the customer.**
 - **Any billing adjustments are reported to the customer.**
 - **Customer may elect to hold a ticket open to ensure that trouble is truly resolved (e.g., repair validation through independent testing).**
 - **Customers may escalate reported trouble to improve level of awareness on critical circuits.**
 - **Qwest has internal escalation methods and timers to keep the repair process on track.**

Response to JClG 6/28/04 Ex Parte

August 18, 2004

General Response

- Special Access is not an emerging service – it has been used and provided by competitors for years**
- Section 272 requires that Qwest treat itself and its affiliates no differently than it does non-affiliates**
- Section 272 does not require that all BOCs provide and administer access services precisely in the same manner**

General Response (cont'd)

- **Parity should be the standard measurement to meet the Section 272 non-discrimination requirements**
- **Measurements should demonstrate that the BOC does not discriminate between its affiliates and non-affiliates – not utilized to compare one BOC to another or create a national standard just for BOCs**
- **The fact that JCIG does not address the Switched Access and PIC measurement proposals shows that they are non-issues**
- **The BellSouth Ex Parte of August 6, 2004 provided an excellent rebuttal to JCIG's assertions**

Issues Specific to Qwest

1. Unanswered ASRs

JCIG Assertion

- JCIG states that “it is possible that any open ASR to which the BOC has not responded will accumulate from month to month and there will be no means of tracking the backlog.”

Qwest Response

- 96% of all ASRs are submitted to Qwest electronically with automatic acknowledgment to the customer. The remaining 4% submitted via fax or email have a fax receipt or email response as their confirmation
- After years of producing a similar 271 measurement, this was shown not to be an issue. Qwest responds to 100% of orders even if they would be late. With concurrence of the CLECs, Qwest has been allowed to remove this measurement from its 271 reports

Issues Specific to Qwest

2. Firm Order Confirmation Timeliness

JCIG Assertion

- **JCIG seems to complain that Qwest's standard FOC interval for DS0 and DS1 services are different from those of BellSouth. JCIG proposes that the FCC mandate national BOC installation and process standards**

Qwest Response

- **Section 272 requires that there is parity between the BOC, its affiliates and its non-affiliates. It does not require BOCs to have the same business practices and intervals for these services**
- **The JCIG proposal is the equivalent of requiring all IXC and CLECs nationwide to provide uniform standard intervals and processes for their access services**

Issues Specific to Qwest

3. New Installation Trouble Report Rate

JCIG Assertion

- ❑ Qwest does not include a New Installation Trouble Report Rate measurement in its proposal
- ❑ JCIG would count all the occurrences of a trouble in a circuit during the new installation period (30 days)

Qwest Response

- ❑ Qwest did include a New Installation Trouble Report Rate measurement (NITR2) in its May 19, 2004 proposal
- ❑ In 2003, the carriers agreed in the 271 proceedings that a similar measure should only count 1 trouble per circuit during the new installation period

Issues Specific to Qwest

3. Non-Qwest Exclusions

JCIG Assertion

- **JCIG complains that Qwest would exclude service installations missed due to non-Qwest reasons**

Qwest Response

- **In fn. 51, JCIG states that customers “frequently will not schedule equipment installations until after the circuit is in place.” This statement supports that Qwest should not be penalized for actions that are beyond its control**
- **Qwest began excluding, instead of counting as met, installations missed due to non-Qwest reasons at the request of the carriers in the 271 proceedings**

Acronyms

- SDC – Service Delivery Coordinator
- SOP – Service order Processor
- NDM – Network Data Mover
- SIA - Strategic Application Architecture Framework Environment
- TIRKS – Trunk Inventory Record Keeping System
- IABS - Integrated Access Billing System
- PREMIS - Premises Information System
- QORA-Qwest Online Request Application
- GUI – Graphical User Interface
- BAN – Billing Authorization Number
- CFA – Circuit Facility Assignment
- NC/NCI – Network Channel/Network Channel Interface
- EXACT - Exchange Access Control and Tracking System
- SOAC – Service Order Analysis and Control