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THE REGULATORY COMMISSION OF ALASKA

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 Before Commissioners:
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Mark Johnson, Chair
Kate Giard
Dave Harbour
James S. Strandberg
G. Nanette Thompson

In the Matter of the New Requirements)
Of 47 CFR § 51 Related to FCC Triennial Review)
Order Interconnection Provisions and Policies) R-03-7
_____)

REPLY TESTIMONY OF M. SUE KEELING ON BEHALF OF
GENERAL COMMUNICATION, INC.

My name is M. Sue Keeling, and I am Director of Local Service for General Communication, Inc. ("GCI"). I submitted testimony in this proceeding on January 12, 2004, on behalf of GCI Communication Corp. d/b/a General Communication, Inc. and d/b/a GCI ("GCI"). In that testimony, I discussed why a Commission-mandated, enforceable batch-cut process is required. I described that the existing batched hot-cut process is not consistent or coordinated between the parties, resulting in unnecessary customer disruptions and outages, and that the adoption of a defined process will improve predictability and timelines, and help improve GCI's ability to utilize installed switch facilities. I also described the procedure required for coordinated hot cut to be performed in batches, identified the number of hot cuts to be performed in a batch, recommended the establishment of a hot cut provisioning metric,¹ and explained that the order provisioning rate structure included hot-cuts and did not need to be addressed as part of this proceeding.

¹ As described in the Reply Testimony of Gina Borland, the parties have since entered an agreement regarding processing and provisioning interval metrics, reporting, and recurring

GCI Communication Corp.
2550 Denali Street, Suite 1000
Anchorage, AK 99503
(907) 265-5600

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2 I have reviewed the ACS Comments and Affidavits of Stephen A. Pratt and Howard
3 Shelanski, also filed on January 12, 2004, and ACS discovery responses filed on March 19,
4 2004, addressing the need for a batch cut process. None of the information provided by
5 ACS changes my recommendation that an enforceable batch cut process is required to
6 improve GCI's ability to utilize installed switch facilities, and thus, address impairment.

7 In summary, by this reply, I identify the parties' agreement that a batch cut process is
8 appropriate for Anchorage, Fairbanks, and Juneau; critique the ACS batched hot-cut
9 process, its insinuation that CLEC actions or demands cause delays or disruption of this
10 process, and its suggestion that no mandated process is necessary because it can handle
11 current order volumes; summarize GCI's batch cut proposal and the benefits of mandated
12 prior coordination and notification; and recommend the appropriate number of orders per
13 batch.

14
15 **1. The Parties' Agreement that a Batch Cut Process Is Appropriate for
Anchorage, Fairbanks, and Juneau**

16 As supported by my testimony and the Testimony of Gina Borland, the Commission
17 should adopt a batch cut process as an essential component to GCI's ability to serve
18 customers who desire GCI service and to maximize utilization of its investment in local
19 service facilities. There does not appear to be any dispute between the parties as to the need
20 for some type of process, only as to the steps that should be required.
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25 cost credits to apply in the event of non-compliance. Therefore, my reply testimony is
26 limited to the batch cut process and does not address performance metrics.

1 ACS and GCI have previously undertaken to establish hot-cut processes to be
2 performed in batches.² For Fairbanks and Juneau, the process was developed as part of the
3 Operations Manual for Fairbanks and Juneau markets.³ In Anchorage, the parties initially
4 entered the ATU/GCI Unbundled, Wholesale and Switching LEC Scenarios Agreement, C.3
5 (6/30/97) (attached hereto as Exhibit MSK-4), but have since agreed to follow the process
6 established for Fairbanks and Juneau. Consistent with these earlier efforts, ACS apparently
7 agrees with me that some process is necessary. For example, ACS witness Pratt stated that
8 “ACS currently uses what we believe the FCC means when it refers to a batch cut process.
9 . . . The orders for all carriers, including ACS, GCI, AT&T, and others, are processed in a
10 single batch.”⁴ ACS witness Shelanski agreed that “ACS now has a procedure in place for
11 hot cuts.”⁵ And ACS echoed Dr. Shelanski’s statement that “ACS now has a procedure in
12 place for hot cuts that meets the actual demand for cut overs that the company is receiving
13 from CLECs.”⁶ Though I do not agree with ACS’ characterization as to the quality of the
14 process, it is clear that a process exists nonetheless.
15

16
17 Even if one looks at the current hot-cut process on a line-by-line basis, it is clear that
18 the intent is for this process to be performed in groups of lines, as batches. First, the current
19 Fairbanks and Juneau Operations Manual describes that “series of lines”—generally not to
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21 ² As described in my testimony, a “hot-cut” (also referred to as loop provisioning or jumper
22 swing) occurs when the line being moved from one carrier switch to another is a “live” line.
23 Testimony of M. Sue Keeling, R-03-7 (filed Jan. 12, 2004) (“Keeling Testimony”) at 3.

24 ³ See Response of GCI to RCA Order Requesting Data, R-03-7 (filed Mar. 19, 2004) (“GCI
25 Discovery Response”) at Exhibit GCI-5(a) & 5(b).

26 ⁴ Affidavit of Stephen A. Pratt, R-03-7 (filed Jan. 12, 2004) (“Pratt Affidavit”) at ¶ 9.

27 ⁵ Affidavit of Howard Shelanski, R-03-7 (filed Jan. 12, 2004) (“Shelanski Affidavit”) at ¶
28 29.

29 ⁶ Comments of ACS of Anchorage, Inc., ACS of Alaska, Inc., and ACS of Fairbanks, Inc.,
30 R-03-7 (filed Jan. 12, 2004) (“ACS Comments”) at 21-22 (citing Shelanski Affidavit at 17).

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2 exceed five—will be converted at a time.⁷ ACS also stated in its discovery response to
3 Question No. 16 that orders for which frame activity is required (which would seem to mean
4 orders requiring hot cuts) are “‘worked’ in groups or batches of ten at a time.”⁸ While ACS
5 apparently agrees that a batch cut process is appropriate for Anchorage, Fairbanks, and
6 Juneau, the lack of consistency even in the number of lines to be included in a batch further
7 supports the need for a Commission-mandated process.

8 GCI and ACS apparently also agree that the same batch cut process should apply
9 uniformly to jumper swings, whether conducted in Anchorage, Fairbanks, or Juneau. ACS
10 has not established different processes for these areas, and all orders are commonly
11 processed in the “ACS service center.”⁹ Although in its comments ACS appears to refer
12 favorably to the suggestion that “‘in a small, rural wire center, where there is not a
13 significant volume of customer migrations, the absence of a batch cut process may not cause
14 impairment,’”¹⁰ it did not demonstrate how or why such a statement would be applicable in
15 Anchorage, Fairbanks, or Juneau, and ACS’ uniform batch cut process for lines in each
16 areas demonstrates that it is not applicable. Finally, Mr. Pratt and ACS also appear to agree
17 with me that the rate structure for per-line hot cuts is not at issue.¹¹

18
19 **2. Deficiencies in the Current ACS Batched Hot-Cut Process**

20 In testimony and through discovery, ACS has explained its hot-cut process. Mr.
21 Pratt describes the essential hot-cut tasks. He states that “orders that require jumper work on

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23 ⁷ GCI Discovery Response, Exhibit GCI-5(a), “Conversions Requiring Jumper Swings.”

⁸ [Redacted] ACS Data Response Compliance Filing Pursuant to Order No. 3, R-03-7 (filed Mar. 19, 2004) (“ACS Discovery Response”) at 7.

⁹ See Pratt Affidavit at ¶ 8; ACS Discovery Response at 6.

¹⁰ ACS Comments at 19 (quoting *Triennial Review Order* at ¶ 490).

¹¹ See ACS Comments at 22-23 (citing Pratt Affidavit at ¶ 12) (describing current and proposed Anchorage rates for loop migration).

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2 the ACS frame or GCI frame, are printed out by Central office technicians in the form of a
3 batch of ‘Rack Sheets’”, which are printed in the central office the afternoon before the
4 order due date; central office technicians “pre-run jumpers on the frame for all orders in the
5 batch that are due the next day;” and “[t]he next morning, the technicians complete jumper
6 connections and disconnect the jumper from the ‘old’ switch.”¹² Though the description is
7 technically accurate, it is devoid of any of the prior notification and coordination steps
8 provided for in the process set forth in the Fairbanks and Juneau Operations Manual.

9 Specifically, the process for “Conversions Requiring Jumper Swings” provides that
10 “ACS will call the designated CLEC . . . at the time agreed upon when the CLEC order was
11 placed.”¹³ The purpose of this initial contact is to “agree on the first series of lines [*i.e.*, the
12 batch] to be converted.”¹⁴ Then after the jumper swing is completed, the process calls for a
13 second contact, during which “ACS will advise the CLEC Technician when the series of
14 jumper swings is complete”¹⁵ The requirement for notification also appears in the
15 process for “Order Completions.” First, an order is not be considered complete until the
16 ACS technician has “call[ed] the designated CLEC . . . from the field site, on the newly
17 installed line when possible, at the time of order completion; indicating ACS work
18 complete.”¹⁶ Second, “Order Completion” also requires a “completion call” to GCI “within
19 5 minutes of completion activity” for coordinated (daytime) or evening conversions.¹⁷ Yet,
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23 ¹² Pratt Affidavit at ¶ 9.

¹³ GCI Discovery Response, Exhibit GCI-5(a), “Conversions Requiring Jumper Swings” at
1.

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ GCI Discovery Response, Exhibit GCI-5(b), “Order Completion.”

¹⁷ *Id.*

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2 these essential steps in the process are missing from Mr. Pratt's description. This reflects
3 the fact that ACS does not consistently adhere to them.

4 These notification and coordination steps are also missing from the process ACS
5 provided with its discovery response as Exhibit 3. Though the 63 steps might appear to be
6 quite thorough and complex at first glance, many of the steps are undertaken by the CLEC,
7 are outside of the hot-cut process, or are duplicative, in that they identify steps that apply to
8 some orders but not others. To illustrate this point, I have broken down the ACS-described
9 steps and annotated them accordingly:

10 · Steps 1-3 are GCI internal processing steps that take place on all orders, not
11 just those requiring a hot-cut.

12 · Step 3 incorrectly identifies the CLEC as entering the order into Siebel.
13 Siebel is ACS' system, and at this time, the CLECs do not have order entry
14 capability into ACS' systems.

15 · Step 4 is a clerical function of printing out GCI-entered orders. Because
16 ACS uses GCI's order spreadsheets to track GCI order information and return
17 Firm Order Commitments ("FOCs") as part of the processing function (not
18 provisioning), it is not clear why the items listed in this step (*i.e.*, "makes
19 forms" and "enter orders into tracking spreadsheet") are included with ACS'
20 description of the hot-cut process.

21 · Steps 5- 27 are redundant. Basically, ACS has listed entry of different order
22 types (*e.g.*, UNE-L install, UNE-L Migration (conversion), Complex Order
23 Disconnect, etc.). An order would require one of these steps either 5 or 6 or
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2 7, etc.), but not each. Again, this is a processing task but not a task in the
3 hot-cut process.

4 Steps 28-32 are system-generated steps for scheduling of technician units and
5 verifying/assigning ACS facilities (if required based on order type). These
6 steps are required for any order types requiring equipment assignment, but
7 not all of these orders require hot cuts.

8 Step 33-35 are redundant based on different order types (Install, Conversion
9 or Disconnect). ACS does not specify what differs in these steps from the
10 previous ones since the "Seibel and Martens work" looks like it is being
11 completed again, which is what happened in Steps 3-32. These steps also do
12 not appear to be specific to the hot-cut process.

13 Step 36 states that the Line Assignor researching cable pair for orders
14 requiring Field Work, but since Martens assigned cable pairs in Step 32, I do
15 not know what the Line Assignor would be doing here that has not already
16 been done.

17 Steps 37-39 again address similar steps for different order types. Since these
18 assignment tasks are not associated directly with the hot cut, as I believe all
19 line assignor functions are completed prior to the hot cut functions as a step
20 in the order processing as opposed to the hot-cut process, these tasks also
21 should not be considered steps in the hot-cut process.
22

23 Step 40-43 all address porting and again appear to be somewhat redundant.
24 Porting would be a step in the hot-cut process only for orders requiring the
25 porting of the number (not all hot-cut orders would require number porting).
26

1 Steps 44-47 appear to be preparation for the technician prior to his work.

2
3 Step 46 is specific to after-hours work, however, so it is not part of the
4 regular process. Step 47 may be a part of the batch cut process, depending on
5 the meaning of “sets up and tears down.” I would assume that this means
6 running and disconnecting jumpers, but those tasks are listed as Steps 48–50.

7 Steps 48-50 involve running and disconnecting jumpers, the purpose of the
8 hot-cut process.

9 Step 51 states that the technician tests for dial tone. This is a task GCI seeks
10 as part of the mandated batch cut process, and it is not clear that this task is
11 being consistently performed today.

12 Step 52 states that the technician completes the order in Martens. This occurs
13 prior to any notification and/or testing with or by the CLEC to determine
14 whether the work was completed correctly, and the services ordered were
15 delivered.

16
17 Step 53 finally has the technician notifying the CLEC of order completion,
18 but this task occurs after the order has been closed and does not address how
19 contact will be made if service problems are discovered

20 Step 54-55 are steps that occur (for lines served by multi-hostable devices
21 and for number assignments) after ACS sent the completion notification, so it
22 is not clear why ACS would be performing any tasks at this time. Also, Step
23 55 appears to be repetitive of Step 40.

1
2 Step 56 reports an “After Hours Labor Factor.” This line item is nonsensical
3 because it is not associated with a specific task, and it is not clear how such a
4 factor would or could be applied.

5 Step 57 is an after-the-fact monthly report for ACS’ internal purposes and has
6 nothing to do with the hot-cut process.

7 Steps 58-63 involve problem resolution outside the hot-cut process and are
8 not relevant. Steps 58-59 occur when the CLEC asks ACS a “non-service
9 order” question, so these are not part of the hot-cut process. Steps 60-63
10 involve orders that do not go through the ACS system correctly (*i.e.*, “system
11 fallout”) and do not get processed correctly; again, these are not a part of the
12 hot-cut process.

13
14 Based on this analysis, it appears that about thirteen of the 63 steps identified by
15 ACS (Steps 37-39 and 44-53) have any relevance to the hot-cut process, and not even each
16 of these tasks are performed for every order. Moreover, the absence of any prior notification
17 or coordination with the CLEC is glaring, particularly in light of the Operations Manual
18 processes for “Conversions Requiring Jumper Swings” and “Order Completions.” For
19 example, Steps 48-50 call for running and disconnecting jumpers, the core purpose of the
20 hot-cut process; however, no CLEC notification occurs prior to the performance of these
21 tasks. As I described in testimony, prior notification and coordination should be a standard
22 part of the process.¹⁸

23 According to Step 51, the ACS technician tests for dial tone, but GCI has been told
24 in the past that the ACS technicians do not test for dial tone. This, too, is necessary to

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26 ¹⁸ *Id.* at 8-12.

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2 ensure that ACS ascertains working dial tone before the work is deemed “completed.” As
3 detailed in my testimony, the failure to perform this task prior to work completion may leave
4 the customer’s service disrupted for an extended period of time, including the time required
5 to process and handle a trouble ticket.¹⁹

6 GCI must also have the opportunity to test the line before the technician leaves the
7 site, which will further reduce the potential for undetected customer outages and help
8 minimize the need to re-schedule an ACS technician to trouble-shoot and complete the
9 order.²⁰ By the same token, Step 52 calls for the technician to “complete” the order in
10 Martens prior to any notification and/or testing with or by the CLEC to determine whether
11 the work was completed correctly, and the services ordered were delivered. Finally, though
12 Step 63 provides for “problem resolution” after orders that “process normally”, it would be
13 more efficient—not to mention better for the customer—for this task to occur in advance of
14 “completing” the order under Step 52.²¹ For all its apparent “details,” the ACS hot-cut
15 process simply leaves too much room for miscommunication (if any communication at all)
16 and hot-cut failure, which contributes to GCI being impaired in its use of switching facilities
17 in Anchorage, Fairbanks, and Juneau.

18 I also disagree with Mr. Pratt’s statement, expanded in discovery, that
19 “[i]nefficiencies with the system are caused by various orders that disrupt the flow of work
20 and require special handling (expedites, bad GCI cable pair assignments, etc.).”²² In its
21 response to discovery Question No. 12, ACS further claimed that its processes are affected
22

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24 ¹⁹ *Id.* at 10-11.

25 ²⁰ *Id.*

26 ²¹ It is not entirely clear whether this task applies to the processing or provisioning phase of
27 the order process.

²² Pratt Affidavit at ¶ 9; *see also* ACS Discovery Response at 5.

1 when: the CLEC assigns a telephone number or cable pair already in use; the CLEC
2 customer has multiple accounts to be migrated to one account; special handling instructions
3 requiring additional time apply; the CLEC provides only one number of several lines that
4 need to be converted at the same time; the CLEC sends multiple numbers and lines for a
5 single customer on different spreadsheets; and the CLEC customer address does not match
6 information in ACS' database.²³ Like many of the steps identified by ACS in response to
7 the Commission's description for ACS' hot-cut process, none of these issues would arise as
8 part of the hot-cut process. Rather, the ACS customer service representative ("CSR") would
9 typically identify any of these matters at the time of order entry, research the matter, correct
10 or reject the order back to the CLEC during the processing phase. These actions would
11 typically be undertaken prior to ACS issuing the firm order commitment, and before any
12 provisioning steps—including the hot-cut process—are undertaken. The issues listed simply
13 do not make it to the hot-cut process if the ACS CSR correctly enters the order, and in most
14 cases, the CSR cannot even enter the order if the address is wrong, the cable pair or phone
15 number is in use, *etc.* Moreover, consolidating accounts is not a *CLEC* error because ACS
16 determines if an account needs to be built or if one already exists for a particular customer.

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19 As for multiple orders sent on different spreadsheets, this issue—which can result in
20 lines to the same customer receiving different FOCs—is usually identified at the time the
21 order is scheduled, again, in the processing phase. If not, and these orders do make it to the
22 hot-cut process, the ACS technician will typically work the order(s) scheduled, and then the
23 CLEC has to reschedule any associated orders not processed. These matters simply are not
24 relevant to the hot-cut process. Though ACS apparently is attempting to cast blame on

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26 ²³ ACS Discovery Response at 5.

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2 CLEC actions for the lack of consistency and coordination in its hot-cut process, it is evident
3 that the cause is inconsistent adherence to the notification and coordination provisions to
4 which ACS and GCI have previously agreed, but which ACS has not incorporated into its
5 institutional hot-cut process.

6 Finally, ACS' witnesses suggest that the adoption of a specific process is not
7 necessary because, according to Mr. Pratt, "[t]he maximum of daily cut-overs is well within
8 ACS' capacity."²⁴ ACS witness echoed this sentiment, stating that "even if problems
9 occurred in the past, ACS now has a procedure in place for hot cuts that meets the actual
10 demand for cut-overs that the company is receiving from CLECs."²⁵ These statements
11 simply ignore the data and past history. First, ACS' data, provided by Mr. Pratt, does not
12 appear to include all order types requiring hot cuts, as he refers only to wholesale to loop
13 conversions,²⁶ ignoring other order types such as new installs, moves, and UNE-P to loop
14 conversions. This failure to include all order types is illustrated by the difference between
15 the order volumes reported by Mr. Pratt and in Exhibit MSK-1. According to Mr. Pratt, the
16 average daily number of orders "requiring central office work" totaled 109 in all of
17 Anchorage, Fairbanks, and Juneau from October 1, 2003, to December 15, 2003.²⁷ Over
18 this same period of time, GCI recorded an average volume of hot-cut orders of 124 in
19 October 2003, 123 in November 2003, and 112 through December 15, 2003. In prior
20 months of the same year, the average ranged from 116 in February to 154 in March. The
21 fact is that monthly order volumes are susceptible to seasonal factors, marketing efforts, and
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24 ²⁴ Pratt Affidavit at ¶ 8.

25 ²⁵ Shelanski Affidavit at ¶ 29.

26 ²⁶ Pratt Affidavit at ¶ 11.

27 ²⁷ *Id.* at ¶ 10.

1 facilities deployment. ACS' "bet" that no mandated process is necessary because order
2 volumes will remain the same is not a bet that GCI wishes to make with its customers or its
3 business.²⁸
4

5 **3. GCI's Batch Cut Proposal and the Benefits of Prior Coordination and**
6 **Notification**

7 GCI provided a comprehensive version of its proposed batch cut process as Exhibit
8 GCI-5 to its discovery response. I have attached hereto as Exhibit MSK-5 a version that
9 strictly sets forth the process, excluding answers to other questions posed by the
10 Commission in discovery Question Nos. 20 and 21. As set forth in my testimony, the key
11 features of this proposal distinguishing it from the current process are notification,
12 coordination, and consistency.²⁹ In summary, the following steps are required to swing the
13 customer loop (or perform the hot cut):

- 14 • On the designated day and time, an ACS Technician is to call the GCI
15 technician to coordinate a set of lines to be converted from the ACS switch to
16 the GCI switch in the relevant collocation.
- 17 • Upon contact and coordination, the ACS Technician is to proceed with the
18 jumper swings.
- 19 • Next, ACS is to advise the GCI Technician by facsimile when the planned
20 series of jumper swings and porting is complete.
21

22 This process, which is equally applicable for one or 100 orders, must be followed for every
23 hot cut, but the coordination and notification may be simplified if undertaken in a "batch."

24 ²⁸ ACS assiduously limits discussion of its data to June 2002 and after (*see, e.g.*, Pratt
25 Affidavit at ¶¶ 8, 11) but GCI customers orders were suffering extraordinary provisioning
26 delays at ACS' hands until at least April 2002.

²⁹ Keeling Testimony at 8-12; Exhibit MSK-2; GCI Discovery Response, Exhibit GCI-5.

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2 Once mandated by the Commission, and assuming consistent adherence, this process
3 should address three key impairments currently facing GCI. First, a consistent, reliable
4 batch cut process is essential to GCI's ability to serve customers. Required coordination
5 between ACS and GCI technicians will reduce the incidence of customer outages that can
6 occur when a loop is moved between carrier switches without notice to and testing by the
7 carrier "receiving" the line. Such outages are particularly difficult for the "receiving" carrier
8 to detect when it does not know the line has been converted. Moreover, prior coordination
9 is especially important for business conversions and move orders, so customer business
10 operations will not be affected simply because they exercise their option to choose a new
11 service provider.³⁰ Seamless coordination should also minimize, if not eliminate, the times
12 when a customer ends up being billed by two carriers during the service transition period.

13
14 Second, adherence to the process will permit GCI to maximize utilization of its
15 investment in our own local service facilities. Contrary to ACS' apparent narrow view of
16 the applicability of the batch cut process,³¹ the batch cut process applies to conversion orders
17 for a UNE loop and GCI facilities, provisioning changes from resale or UNE-P to UNE-L,
18 new install orders for an unbundled loop (though not "live," the line must still be swung
19 from the ACS switch to the GCI switch), and move orders involving existing UNE-L, either
20 to the old or new location, requires a "hot cut."³²

21 Third, a batch-cut process ensures "like treatment" among ACS and GCI customers.
22 The ACS' process for scheduling and performing the "hot cut" by disconnecting a loop from
23

24 ³⁰ *Id.* at 9; Borland Testimony at 3, 5-6.

25 ³¹ *See, e.g.*, Pratt Affidavit at ¶ 11 (including only total service resale to UNE-loop
26 conversions in order counts).

27 ³² *See* Keeling Testimony at 3-4 (explaining order types in detail).

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2 its switch to be connected with GCI's switch can be inconsistent, uncoordinated and lead to
3 service interruption. An ACS customer, however, does not experience such outages, delays,
4 or disruptions.³³ As described in my and Gina Borland's testimony, the problems caused by
5 the lack of a consistent process can result in the disruption of dial tone or forcing the
6 customer to remain on ACS service (or facilities) longer than necessary.³⁴

7 Finally, but certainly not least, past experience demonstrates that a coordinated batch
8 cut process is especially crucial when order volumes increase—whether expectedly or
9 unexpectedly.³⁵ Order volumes requiring hot cuts could escalate if GCI enters a new
10 market, begins accessing sub-loops where it currently cannot provide UNE-L service, or
11 launches a successful marketing effort. Given the past customer dissatisfaction under these
12 conditions and in the absence of a batch cut process, I disagree with ACS' apparent
13 assessment that the “absolute numbers of customers to be transferred [at any future point]
14 are not of the magnitude” that merit a batch cut process.³⁶ ACS has not had adequate
15 processes to handle volume spikes in the past, and the result has been delays in the transition
16 of customers to GCI facilities and dissatisfied consumers.

17
18 **5. The Number of Orders Per Batch**

19 Given the close coordination required to avoid customer outages and delays, GCI has
20 proposed that ACS schedule up to 10 conversions (counted on a customer basis) to be
21 performed in a batch. ACS apparently agrees, reporting that it works orders in batches of
22

23
24 ³³ Keeling Testimony at 11 (“ACS does not leave its accounts in limbo on a conversion from
GCI, as it does on a consistent basis to GCI.”)

25 ³⁴ Keeling Testimony at 2-3; Borland Testimony at 5.

26 ³⁵ Keeling Testimony at 5.

27 ³⁶ See ACS Comments at 21.

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2 ten at a time.³⁷ While I believe that the Commission should generally adopt a maximum
3 order per batch, no minimum should apply for the reasons described in the Borland
4 Testimony.³⁸ In addition, the Commission should adopt an exception to the maximum for
5 any single customer order having more than 10 lines. In this case, all the lines for the
6 customer's order should be worked in a single batch to ensure a complete, coordinated
7 cutover and to minimize isolated—but potentially difficult to identify—service disruptions.
8 This approach should not be burdensome on ACS, given its current practice. For example, I
9 am familiar with one recent example where ACS provided notification of 19 hot-cut
10 completions in one facsimile transmission (attached hereto as Exhibit MSK-6).

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15 For these reasons, I recommend that the Commission adopt the batch cut processes
16 as proposed by GCI

GCI Communication Corp.
2550 Denali Street, Suite 1000
Anchorage, AK 99503
(907) 265-5600

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25 ³⁷ ACS Discovery Response at 7.

26 ³⁸ Borland Testimony at 6-7.

(Sue Keeling)

Exhibit
MSK-4

ATU/GCI Unbundled, Wholesale and Switching LEC Scenarios

This document includes the following order processes:

- A. Switching from GCI to ATU (local service)
- B. Switching from GCI to AT&T (local service)
- C. Switching from ATU LEC to GCI facilities (local service)
- D. Wholesale Order Processing (other than switching the LEC for an access line)
- E. Unbundled Resale Order Processing

A. Switching from GCI LEC To ATU Local Service

A.1 Switching from GCI LEC (ATU wholesale) to ATU (local service)

1. ATU receives an LLOA from the customer and keeps on file for 1 year.
2. ATU sends LLOA to GCI for verification. If the LLOA data is incorrect GCI issues a rejection notice to ATU. ATU resubmits rejected request with the correct information.
3. GCI provides verification to ATU within 8 business hours of receipt.
4. ATU self provides "snapshot".
5. ATU issues internal service order.
6. ATU notifies GCI of billing effective date.

A.2 Switching from GCI (ATU unbundled loop-GCI number) to ATU (local service)

1. ATU receives an LLOA from the customer and keeps on file for 1 year.
2. ATU sends LLOA information (with a request for a "snapshot" if required) to GCI.
3. GCI verifies the LLOA data. If the LLOA data is incorrect, GCI issues a rejection notice to ATU and proceeds no further. ATU resubmits rejected request with the correct information.

4. GCI provides LLOA verification (and "snapshot" data if requested) to ATU within 8 business hours of LLOA receipt. The snapshot will contain the customers physical service address, the E911 address (which is the physical service address), any bill to numbers(s) itemized regulated services, and interexchange PIC information.
5. ATU issues service order to provide the appropriate line treatment (port, intercept, or RCF) to the assigned ATU route or number.
 - ATU may opt to send LLOA information and SO simultaneously.
6. ATU issues internal service order to install number & move jumper.
7. ATU will notify, GCI by facsimile or other electronic method, of all orders completed per day. These notifications will occur every 2 hours.
8. GCI completes order to port number and unprovision GCI switch within 2 hours.
9. GCI updates the GCI number management system.

A.3 Switching from GCI LEC (ATU unbundled loop-ATU number to ATU (local service)

1. ATU receives an LLOA from the customer and keeps on file for 1 year.
2. ATU sends LLOA (with a request for a "snapshot" if required) to GCI for verification.
3. GCI verifies the LLOA data. If the LLOA data is incorrect GCI issues a rejection notice to ATU. ATU resubmits rejected request with correct information.
4. GCI provides LLOA verification (and "snapshot" data if requested) to ATU within 8 business hours of LLOA receipt. The snapshot will contain the customer physical service address, the E911 address (which is the physical service address), any bill to number(s) itemized regulated services, and interexchange PIC information.
5. ATU sends service order (SO) to GCI
 - ATU may opt to send LLOA information and SO simultaneously.
6. ATU issues internal service order to install number, unport number, and move jumper.

7. ATU will notify, GCI by facsimile or other electronic method, of all orders completed per day. These notifications will every 2 hours
8. GCI completes order to unprovision switch within 2 hours.

A.4 Switching from GCI LEC (facilities and GCI number) to ATU (local service)

1. ATU receives an LLOA from the customer and keeps on file for 1 year.
2. ATU sends LLOA information (with a request for a "snapshot" if required) to GCI.
3. GCI verifies the LLOA data. If the LLOA data is incorrect, GCI issues a rejection notice to ATU and proceeds no further. ATU resubmits rejected request with the correct information.
4. GCI provides LLOA verification (and "snapshot" data if requested) to ATU within 8 business hours of LLOA receipt. The snapshot will contain the customers physical service address, the E911 address (which is the physical service address), any bill to number(s) itemized regulated services, and interexchange PIC information.
5. ATU issues service order to provide the appropriate line treatment (port, intercept, or RCF) to the assigned ATU route or number.
 - ATU may opt to send LLOA information and SO simultaneously.
6. GCI sends order confirmation including verification to ATU within 8 business hours of receipt. If the LLOA data is incorrect GCI issues a rejection notice to ATU. ATU resubmits rejected request with the correct information.
7. ATU issues internal service order, to install number & to provide ATU loop connectivity.
8. ATU will notify, GCI by facsimile or other electronic method, of all orders completed per day. These notifications will occur every 2 hours.
9. GCI completes order to unprovision switch and port number within 2 hours.
10. GCI updates the GCI number management system.

A.5 Switching from GCI LEC (GCI facilities and ATU number) to ATU LEC

1. ATU receives an LLOA from the customer and keeps on file for 1 year.
2. ATU sends LLOA to GCI for verification. If the LLOA data is incorrect GCI issues a rejection notice to ATU. ATU resubmits rejected request with correct information.
3. GCI provides LLOA verification (and "snapshot" data if requested) to ATU within 8 business hours of LLOA. The snapshot will contain the customer physical service address the E911 address (which is the physical service address), any bill to number(s), itemized regulated services, and interexchange PIC information.
4. ATU sends service order (SO) to GCI.
 - ATU may opt to send LLOA information and SO simultaneously.
5. ATU issues internal order to install number, unport number, and provide ATU loop connectivity.
6. ATU will notify, GCI by facsimile or other electronic method, of all orders completed per day. These notifications will occur every 2 hours.
7. GCI completes the order to unprovision GCI switch within 2 hours.

B. Switching from GCI LEC to AT&T LEC.

B.1 Switching from GCI LEC (ATU wholesale) to AT&T LEC(ATU wholesale)

1. AT&T receives an LLOA from the customer and keeps on file for 1 year.
2. AT&T sends LLOA (with a request for a "snapshot" if required) to GCI for verification. If the LLOA data is incorrect GCI issues a rejection notice to AT&T. AT&T resubmits rejected request with the correct information.
3. GCI sends order confirmation including GCI's verification (with "snapshot" data if requested) to AT&T within 8 business hours of receipt.

4. AT&T sends order to ATU, including GCI's verification.
5. ATU issues service order to change billing, reroute 411 and 611 calls, and notifies AT&T of due date.
6. AT&T and GCI communicate in-effect dates.

B.2 Switching from GCI LEC (ATU unbundled loop GCI number) to AT&T LEC (ATU wholesale)

1. AT&T receives an LLOA from the customer and keeps on file for 1 year.
2. AT&T sends LLOA (with a "snapshot" if required) to GCI for verification, including unbundled elements. If the LLOA data is incorrect GCI issues a rejection notice to AT&T. AT&T resubmits rejected request with the correct information.
3. GCI verifies the LLOA data. If the LLOA data is incorrect GCI issues a rejection notice to AT&T. AT&T resubmits rejected request with correct information.
4. GCI sends order confirmation, verification (and "snapshot" if required) and unbundled elements to AT&T within 8 business hours.
5. AT&T sends order to ATU, including the verification and information on unbundled elements from GCI:
 - Order to establish new telephone number (if applicable)
 - Due date
 - Jumper change
 - Routing for 411 and 611
6. AT&T issues service order to GCI to provide the appropriate line treatment (port, intercept, or RCF) to the assigned ATU route or number.
7. ATU issues internal service order to install number & move jumper.
8. ATU will notify, GCI by facsimile other electronic method, of all orders completed per day. These notifications will occur every 2 hours.
9. GCI completes order to port number and unprovision GCI switch within 2 hours.
10. AT&T and GCI communicate in-effect dates.

B.3 Switching from GCI LEC (ATU unbundled loop - ATU number to AT&T (local service)

1. AT&T receives an LLOA from the customer and keeps on file for 1 year.
2. AT&T sends LLOA (with a request for a "snapshot" if required) to GCI for verification.
3. GCI verifies the LLOA data . If the LLOA data is incorrect GCI issues a rejection notice to AT&T. AT&T resubmits rejected request with correct information.
4. GCI provides LLOA verification (and "snapshot" if required) to AT&T within 8 business hours of LLOA receipt. The snapshot will contain the customer physical service address, the E911 address (which is the physical service address), any bill to number(s) itemized regulated services, and interexchange PIC information.
5. AT&T sends order to ATU, including GCI's verification.
 - Order to establish new telephone number (if applicable)
 - Due date
 - Jumper change
 - Routing for 411 and 611
6. ATU issues service order to change billing, reroute 411 and 611 calls, unport number, and notifies AT&T of due date.
7. ATU will notify, GCI by facsimile or other electronic method, of all orders completed per day. These notifications will occur every 2 hours.
8. GCI completes order to unprovision GCI switch within 2-hours.
9. AT&T and GCI communicate in-effect dates.

B.4 Switching from GCI LEC (facilities and GCI number) to AT&T LEC (ATU wholesale)

1. AT&T receives an LLOA from the customer and keeps on file for 1 year.

2. AT&T sends LLOA (with a request for a "snapshot" if required) to GCI for verification.
3. GCI verifies LLOA data. If the LLOA data is incorrect GCI issues a rejection notice to AT&T. AT&T resubmits rejected request with the correct information.
4. GCI sends order confirmation including verification (and "snapshot" if required) to AT&T within 8 business hours of receipt. The snapshot will contain the customer physical service address, the E911 address (which is the physical service address), any bill to number(s) itemized regulated services, and interexchange PIC information.
5. AT&T sends order to ATU, including verification from GCI:
 - Order to establish new telephone number(if applicable)
 - Due date
 - Routing of 411 and 611
6. AT&T issues service order to GCI to provide the appropriate line treatment (port, intercept, or RCF) to the assigned ATU route or number.
7. ATU will notify, GCI by facsimile or other electronic method, of all orders completed per day. These notifications will occur every 2 hours.
8. GCI completes order to port number and unprovision GCI switch
9. AT&T and GCI communicate in-effect dates.

C. Switching from ATU LEC to GCI LEC

C.1 Switching from ATU LEC to GCI LEC (facilities and number) (local service)

1. GCI receives an LLOA from the customer and keeps on file for 1 year.
2. GCI sends LLOA (with a request for a "snapshot" if required) to ATU for verification. If the LLOA data is incorrect ATU issues a rejection notice. GCI resubmits rejected request with the correct information.
3. ATU sends LLOA verification (and "snapshot data if required) to GCI within 8 business hours of LLOA receipt. The snapshot will contain the customer physical service address, the E911 address (which is the

physical service address), any bill to number(s) itemized regulated services, and interexchange PIC information.

4. GCI sends SO to ATU requesting disconnect and appropriate line treatment (port, RCF or intercept) ATU number to GCI route or number.
 - GCI may opt to send LLOA information and SO simultaneously.
5. GCI completes order to unport number, provide loop connectivity and notifies ATU within 2 hours.
6. ATU issues order to unprovision ATU switch within 2 hours.

C.2 Switching from ATU LEC to GCI LEC (facilities and ATU number)
(local service)

1. GCI receives a LLOA from the customer and keeps on file for 1 year.
2. GCI sends LLOA information (with a request for a "snapshot" if required) to ATU.
3. ATU verifies the LLOA data . If incorrect ATU issues a rejection notice to GCI. GCI resubmits request with correct information.
4. ATU provides LLOA verification (and "snapshot" data if required) to GCI within 8 business hours of LLOA receipt. The snapshot will contain the customer physical service address, the E911 address (which is the physical service address), any bill to number(s) itemized regulated services, and interexchange PIC information.
5. GCI sends service order (SO) to ATU
 - GCI may opt to send LLOA information and SO simultaneously.
6. ATU issues internal service order to move jumper and port number to GCI.
7. ATU completes order. ATU personnel will coordinate to insure jumper change and provision work will be completed in 20 minutes.
8. ATU will notify, GCI by facsimile or other electronic method, of all orders completed per day. These notifications will occur every 2 hours.
9. GCI completes order to provision switch within 2 hours.

C.3 Switching from ATU LEC to GCI LEC (ATU Unbundled Loop and GCI number) (local service)

1. GCI receives a LLOA from the customer and keeps on file for 1 year.
2. GCI sends LLOA information (with a request for a "snapshot" if required) to ATU.
3. ATU verifies the LLOA data . If incorrect ATU issues a rejection notice to GCI. GCI resubmits request with correct information.
4. ATU provides LLOA verification (and "snapshot" data if required) to GCI within 8 business hours of LLOA receipt. The snapshot will contain the customer physical service address, the E911 address (which is the physical service address), any bill to number(s) itemized regulated services, and interexchange PIC information.
5. GCI sends service order (SO) to ATU
 - GCI may opt to send LLOA information and SO simultaneously.
6. ATU will notify, GCI by facsimile or other electronic method, of all orders completed per day. These notifications will occur every 2 hours.
7. ATU issues internal service order to move jumper and unprovisions switch within 2 hours.
8. ATU personnel will work with GCI personnel to unport number at GCI and move jumper within 20 minutes.

D. Wholesale Order Processing
(other than switching the LEC for an access line)

General:

- a) Applies to any ATU tariffed service.
- b) Service order process as applies to "switch as is" is defined in the ATU/GCI Wholesale Order Process and ATU GCI Order Definition agreements and will apply for circuit "switch as is" wholesale orders as well. Rates are defined in the ATU/GCI Interconnection Agreement as \$10.00 per "switch as is" interconnection fee.

Other wholesale orders:

- One SO applies per individual customer at a single address with the same due date.
- SO rates as defined by ATU local tariff will apply, less the applicable discount percentage.

Process:

1. GCI obtains an LLOA (with request for "snapshot" if required) for the service being ordered. If account is not currently a GCI LEC account or a GCI LEC customer, LLOA will also contain the ATU telephone, circuit or billing number.
2. GCI sends the local SO to ATU (with LLOA data if applicable) and the customer desired due date.
3. ATU verifies the LLOA information (and "snapshot" if required) and notifies GCI of an order confirmation with due date or LLOA rejection within 8 business hours.
4. ATU processes the order.
5. GCI will use ATU confirmation due date as the in-effect date of the actual service ordered.

E. Unbundled Resale Order Processing

General:

- a) Applies to an ATU service, or service element, as identified in the ATU/GCI Interconnect Agreement.
- b) A service order will include only unbundled element. Service order rates as defined by ATU local tariff will apply, in addition to the rates identified in the ATU/GCI Interconnection Agreement.
- c) GCI obtains an LLOA for this service unless GCI LEC is ordering the service for GCI LEC "company official" account.

E.1 Order Process

E.1.a. Loops:

1. As defined in the Loop Resale Order Process Agreement.

E.1.b. Local Transport - Entrance Facility (Interconnection Agreement Exhibit A&N)

1. SO for unbundled network elements will contain up to 24 elements per SO with same end user locations.
2. GCI sends SO to ATU identifying entrance facility requirements; to include location addresses and trunking requirements, at a minimum.

E.1.c. Common Channel Signaling (Interconnection Agreement Exhibit A&N)

1. SO for unbundled network elements will contain up to 24 elements per SO with same end user locations.
2. GCI sends SO to ATU identifying entrance facility requirements; to include location addresses and trunking requirements, at a minimum.

E.1.d. Direct Trunk Transport Termination (Interconnection Agreement Exhibit A&N)

1. SO for unbundled network elements will contain up to 24 elements per SO with same end user locations.
2. GCI sends SO to ATU identifying entrance facility requirements; to include location addresses and trunking requirements, at a minimum.

E.1.e. Other Switched Services (Interconnection Agreement Exhibit A)

1. SO would contain up to 24 translations or request for auto testing and transmissions paths.
2. GCI sends SO to ATU identifying required translation, numbers effected, and/or testing and transmission paths.

E.1.f. Unbundled Elements Identified in Exhibit F of the ATU/GCI Interconnection Agreement

1. GCI places SO identifying requested element(s).

- 2. ATU researches and provides availability based upon location, cost, due date for requested elements, and advises GCI LEC.
- 3. Based upon GCI's direction, ATU will process order.

In WITNESS WHEREOF, the parties hereto have caused this agreement to be executed by the duly authorized officers.

ATU Telecommunications

By: Sue Keelingby

Title: Div. Mgr

Date: 6-30-97

G.C.I. Communications

By: Anna Boland

Title: Director, Local Service Systems

Date: 6-30-97

(Sue Keeling)

Exhibit
MSK-5

EXHIBIT MSK-5

GCI PROPOSAL FOR COORDINATED BATCH “HOT CUTS”

GCI proposes that the following tasks be followed for every GCI order that requires moving customer loops from the ACS switch to the GCI switch. This process must be followed for every line for which a hot cut is performed, but the coordination and notification will be simplified if undertaken in a “batch.” The batch hot cut process is to commence once ACS has processed the GCI order, assigned a due date, and issued a “Firm Order Confirmation” (“FOC”) to GCI.

On the assigned due date for a given order or group of orders, the following steps should be taken to swing a customer loop or loops at a given collocation site:

1. The ACS Technician calls the GCI technician to coordinate a set of lines to be converted from the ACS switch to the GCI switch at the relevant collocation site. This telephonic notice of the conversions to be performed should be provided no more than 30 minutes in advance of the work to be performed and should confirm telephone number and cable pair assignment for each line, as well as the sequential order in which ACS will provision each line in the batch.
2. Upon contact and coordination (Task 1), the ACS Technician proceeds with the designated jumper swings.
3. When the planned series of jumper swings and porting of the associated number are complete, the ACS technician provides the GCI technician notification by facsimile that the work has been completed and identifies the lines (by telephone number) for which the work was completed. This notification is to be provided immediately upon

EXHIBIT MSK-5

completion of all of the line swings in the batch and before the ACS technician departs the wire center. This task will permit GCI to confirm completion/service availability and immediately contact the ACS technician at the collocation site if a problem is detected.

4. The GCI technician will test and validate the service to confirm the successful completion of the hot cut before ACS closes the service order. The loop provisioning will not be deemed “completed” until both ACS and GCI personnel have signed off on the order upon completion of their respective tasks. To meet this requirement, the ACS technician must remain at the collocation site until the GCI technician notifies the ACS technician that testing has been completed and service for each line is confirmed or 30 minutes, whichever comes first.
5. If either ACS or GCI determines that an order has not been successfully completed, then that order shall be included in the next immediate batch for the service area.

A maximum of 10 conversions (counted on a customer basis) are to be performed in a batch. In the case of any customer order having more than 10 lines, all the lines in the single order should be worked as a batch. No cap may be placed on the number of orders that may be worked in a day.

(Sue Keeling)

Exhibit
MSK-6

MRCPRK90 CENTRAL OFFICE FRAME ACTIVITY PAGE

SO TYPE: SOASN SR: 5514027 SO: 1-V33ZP LCI: 0001 DE: P CO: P

CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC

TN: 907 770-7961 NP LE: GCIC-01-0-04-30 (V)

COS 1: TGLLPR SWCOS: 1FR

TJUR: F/AK/0100 ESL: N GRD: N

NAME: STUART LOWERISON

FEEDER: C11-01707 (S)

SWITCH COMMANDS

NEW \$ 7707961 1FR ANC ?LTG GCI 01 0 04 30 CNDB NOAMA \$ Y

ADO \$ GCI 01 0 04 30 DGT \$ Y

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SOOMT SR: 4924382 SO: 1-V4P15 LCI: 0002 DE: P CO: P
 CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
 TN: 907 677-9300 LE: GCIC-01-0-03-80 (V)
 COS 1: TGLLPR SWCOS: 1FR
 TJUR: F/AK/0100 ESL: N GRD: N

NAME: MATTHEW FIKE

FEEDER: C11-00983 (S)

DISCONNECT LE: HOST-00-1-00-06

SWITCH COMMANDS

OUT \$ 6779300 GCI 01 0 72 67 BLDN Y

NEW \$ 6779300 1FR ANC ?LTG GCI 01 0 03 80 CNDB NOAMA \$ Y

ADO \$ GCI 01 0 03 80 DGT \$ Y

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SODIS	SR: 8268373	SO: 1-V3SB7	LCI: 0001	DE: P	CO: P
CO: CWC	DD: 03/24/04	WORK FORCE: GCI	SW ID: GCIC		
TN: 907 563-1058	LE: GCIC-01-0-21-53	(W)			
COS 1: TGLLPR	SWCOS: 1FR				
TJUR: F/AK/0100	ESL: N	GRD: N			
NAME: ISAAC J HULL					
FEEDER: C11-01704 (W)					
SWITCH COMMANDS					
OUT \$ 5631058 GCI 01 0 21 53 BLDN Y					

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SODIS SR: 2642051 SO: 1-V2YOE LCI: 0001 DE: P CO: P
 CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
 TN: 907 770-7641 LE: GCIC-01-0-20-24 (W)
 COS 1: TGLLPR SWCOS: 1FR
 TJUR: F/AK/0100 ESL: N GRD: N

NAME: MATTHEW DAVIS

FEEDER: C12-02094 (W)

SWITCH COMMANDS

OUT \$ 7707641 GCI 01 0 20 24 BLDN Y



MRCPRK90 CENTRAL OFFICE FRAME ACTIVITY PAGE

SO TYPE: SOOMF SR: 7340556 SO: 1-V4NRM LCI: 0001 DE: P CO: P

CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC

TN: 907 561-8123 LE: GCIC-02-0-27-44 (W)

COS 1: TGLLPR SWCOS: 1FR

TJUR: F/AK/0100 ESL: N GRD: N

NAME: GEORGE III SIKAT

FEEDER: C9-02697 (W)

SERVICE ORDER INSTRUCTIONS

MOVE TO SWC LOOP

MRCPRK90 M452 - END OF LIST

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SODIS SR: 7985419 SO: 1-V3X1A LCI: 0001 DE: P CO: P
CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
TN: 907 770-5260 LE: GCIC-02-0-02-26 (W)
COS 1: TGLLPR SWCOS: 1FR
TJUR: F/AK/0100 ESL: N GRD: N
NAME: LLOYD MAINO
FEEDER: C8-01854 (W)
SWITCH COMMANDS
OUT \$ 7705260 GCI 02 0 02 26 BLDN Y

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SODIS SR: 7382160 SO: 1-U5RTJ LCI: 0001 DE: P CO: P
 CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
 TN: 907 743-0523 LE: GCIC-02-0-25-49 (W)
 COS 1: TGLLPR SWCOS: 1FR
 TJUR: F/AK/0100 ESL: N GRD: N
 NAME: COHLEEN WHEELER
 FEEDER: C9-00799 (W)
 SWITCH COMMANDS
 OUT \$ 7430523 GCIC 02 0 25 49 BLDN Y

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SODIS SR: 7267247 SO: 1-V3U6H LCI: 0001 DE: P CO: P
 CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
 TN: 907 743-0862 LE: GCIC-02-0-25-75 (W)
 COS 1: TGLLPR SWCOS: 1FR
 TJUR: F/AK/0100 ESL: N GRD: N
 NAME: CANDICE WILSON
 FEEDER: C8-00206 (W)
 SWITCH COMMANDS
 OUT \$ 7430862 GCIC 02 0 25 75 BLDN Y

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SODIS SR: 2444906 SO: 1-V3SA6 LCI: 0001 DE: P CO: P
 CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
 TN: 907 563-0561 LE: GCIC-02-0-30-28 (W)
 COS 1: TGLLPR SWCOS: 1FR
 TJUR: F/AK/0100 ESL: N GRD: N
 NAME: RICK DEZEEUM
 FEEDER: C9-01037 (W)
 SWITCH COMMANDS
 OUT \$ 5630561 GCIC 02 0 30 28 BLDN Y

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE :

SO TYPE: SODIS SR: 1117710 SO: 1-V2WGB LCI: 0001 DE: P CO: P
 CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
 TN: 907 770-7532 LE: GCIC-02-0-01-12 (W)
 COS 1: TGLLPR SWCOS: 1FR
 TJUR: F/AK/0100 ESL: N GRD: N
 NAME: LISA LANGLEY
 FEEDER: C9-00778 (W)
 SWITCH COMMANDS
 OUT \$ 7707532 GCI 02 0 01 12 BLDN Y

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SODIS SR: 3140898 SO: 1-V3WZL LCI: 0001 DE: P CO: P
 CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
 TN: 907 743-8939 LE: GCIC-03-0-12-20 (W)
 COS 1: TGLLPR SWCOS: 1FR
 TJUR: F/AK/0100 ESL: N GRD: N

NAME: DOROTHY ANDERSON
 FEEDER: C5-01001 (W) CHAN: 065
 CARRIER: PGPLUS*CWC*02*6PGP2-11
 SWITCH COMMANDS
 OUT \$ 7438939 GCI 03 0 12 20 BLDN Y

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SODIS SR: 7006655 SO: 1-V2ZCW LCI: 0001 DE: P CO: P
 CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
 TN: 907 562-0446 LE: GCIC-03-0-04-47 (W)
 COS 1: TGLLPR SWCOS: 1FR

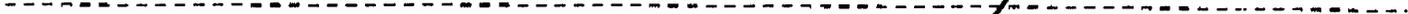
TJUR: F/AK/0100 ESL: N GRD: N

NAME: SEAN SLOAN

FEEDER: C4-01288 (W)

SWITCH COMMANDS

OUT \$ 5620446 GCI 03 0 04 47 BLDN Y



MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SODIS SR: 6252526 SO: 1-V3QYD LCI: 0001 DE: P CO: P
 CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
 TN: 907 258-0927 NP LE: GCIC-03-0-09-15 (W)
 COS 1: TGLLPR SWCOS: 1FR
 TJUR: F/AK/0100 ESL: N GRD: N
 NAME: CLARENCE W TOWNSEND
 FEEDER: C4-01450 (W)
 SWITCH COMMANDS
 OUT \$ 2580927 GCI 03 0 09 15 BLDN Y

MRCPRK90 CENTRAL OFFICE FRAME ACTIVITY PAGE

SO TYPE: SODIS SR: 9898463 SO: 1-V3IMB LCI: 0001 DE: P CO: P

CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC

TN: 907 337-7065 LE: GCIC-04-0-16-89 (W)

COS 1: TGLLPR SWCOS: 1FR

TJUR: F/AK/0100 ESL: N GRD: N

NAME: WILLIAM PLUNK

FEEDER: C1-01582 (W)

SWITCH COMMANDS

OUT \$ 3377065 GCI 04 0 16 89 BLDN Y

MRCPRK90 M452 - END OF LIST

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SODIS SR: 1607590 SO: 1-V40LO LCI: 0001 DE: P CO: P
 CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC
 TN: 907 743-0763 LE: GCIC-04-0-08-83 (W)
 COS 1: TGLLPR SWCOS: 1FR
 TJUR: F/AK/0100 ESL: N GRD: N

NAME: JUNG KANG
 FEEDER: C1-03282 (W)
 SWITCH COMMANDS
 OUT \$ 7430763 GCI 04 0 08 83 BLDN Y

MRCPRK90

CENTRAL OFFICE FRAME ACTIVITY

PAGE

SO TYPE: SOOMF SR: 1024447 SO: 1-V1RSQ LCI: 0001 DE: P CO: P

CO: CWC DD: 03/24/04 WORK FORCE: GCI SW ID: GCIC

TN: 907 349-6018 NP LE: GCIC-04-0-07-28 (W)

COS 1: TGLLPR SWCOS: 1FR

TJUR: F/AK/0100

ESL: N GRD: N

NAME: TAMARA L GRUEBER

FEEDER: C3-00805 (W)

SERVICE ORDER INSTRUCTIONS

MOVING FRM CWC LOOP TO SWC WHOLESALE
