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Installation, Coordinated Installation, and Project Coordinated Installation. The process for each varies according to the degree of scheduling, coordination and cooperative testing the CLEC desires, as well as by the number of loops involved in the installation. Basic Installation is the most streamlined process that Qwest offers today, and Project Coordinated Installation the most complex. Exhibit DP-3 generally depicts the installation options as they exist today in the Unbundled Loop Product Catalog or PCAT. Importantly, the BHCP described in this Declaration will be a new option for CLECs; all of these existing installation options will still be available going forward.

**A. Qwest CLEC Coordination Center**

15. The provisioning of unbundled analog loops is handled through the Qwest CLEC Coordination Center (“QCCC”). The QCCC was formed as part of Qwest’s 271 process to improve Qwest’s loop provisioning performance. The QCCC is involved in the provision of every unbundled analog loop today irrespective of the provisioning option involved and will remain involved when loops are converted using this newest provisioning option. The QCCC was created in April 2001 specifically to improve Qwest’s performance of *coordinated* unbundled loop installations. Prior to April 2001, Qwest was handling CLEC orders for the coordinated installation across multiple geographic centers. Prior to the QCCC’s opening, Qwest had approximately 84,000 unbundled loops in service, but only approximately 88% of the loops requesting a basic installation options were being completed on time, while less than 40% of coordinated installations were performed on time (as that term is defined in Performance Indicator

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(“PID”) OP-13). This does not mean that these loops were not installed on the correct day, but only that Qwest did not contact the CLEC within the 30 minute window established for a coordinated installation. The QCCC was created to improve this performance, and by any objective measure it has succeeded. By September 30, 2003, for example, Qwest had provisioned and installed 564,028 unbundled stand-alone loops, and over 98% were provisioned on time, as discussed below.

16. Due to the early success of the QCCC and its dramatic impact on performance results, the QCCC’s role was expanded about nine months later to include oversight of the provision of all unbundled loops. From its inception, the QCCC has been focused on improving the provisioning performance captured in the following PID measurements:

- 1) OP-3 – Installation commitments met; and
- 2) OP-7 – Interval to perform the hot cut; and
- 3) OP-13 – Percent of coordinated installations completed on time.

Table 1.1 is a view of the regional PID results for a seven month period of time in 2001 for analog loops and shows the improvements in these PID measurements in the 3 months prior and subsequent to the QCCC’s creation in April 2001.

Table 1.1

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	Jan 2001	Feb 2001	Mar 2001	April 2001 (QCCC Created)	May 2001	June 2001	July 2001
OP-3 <sup>9</sup>	92.52%	94.11%	95.56%	95.24%	93.14%	96.52%	98.64%
OP-7	0:08	0:08	0:08	0:07	0:05	0:04	0:04
OP-13	71.06%	74.77%	82.19%	87.9%	93.89%	98.07%	99.03%

17. The QCCC was able to achieve these improvements by focusing on three aspects of the job. The first was to issue detailed job descriptions to attract the most highly trained employees in order to limit ramp up time. Second, internal processes were refined with specific tasks and work steps to ensure a high level of performance on the loops requiring coordination. Third, the QCCC instituted a standing daily status meeting to review each order on an individual basis that was not provisioned on time or any other order related issue that affected or impacted the installation quality of the CLECs' service.

18. Originally, the QCCC served as the Network Overall Control Office ("OCO") for the provisioning of unbundled loop orders. This included the coordination of installation activities with the CLEC and the Qwest departments such as the CO, Outside Field forces (if needed), the Central Office Resource Allocation Center ("CORAC"), Field Load and Resource Allocation Center ("LRAC"), and Design Services. The orders were loaded to a designated Service Representative Coordinator who was responsible for

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the end-to-end installation of unbundled loops that were provisioned using the coordinated installation option. Additionally, the Service Representative Coordinator in the QCCC was responsible for coordinating the actual order installation, at a CLEC-designated time, between the Qwest Central Office Technician (“COT”) and the CLEC representative.<sup>10</sup> Eventually, the QCCC was also identified as the Maintenance Control Office (“MCO”) with responsibilities for maintenance on all the embedded unbundled loops today and also the responsibility for any loops installed within the last 30 days via the 30 day warranty process. Exhibit DP-4 is a copy of the QCCC warranty process. Once again, by allowing this dedicated pool of resources to focus on the maintenance issues associated with an unbundled loop, certain efficiencies are realized and result in a greater customer, i.e., CLEC experience. By early 2002, the QCCC had been processing all the coordinated unbundled loops across the region, and the loop performance measurements for these cuts had stabilized at around 97.5% of all commitments. Given this success, the QCCC’s responsibilities were expanded in February 2002 to include basic loop installation. Staffing levels increased to a total of 102 employees. Basic installation performance in early 2002 was running an average of 90% commitments met. Once this work migrated to the QCCC, the performance improved to an average of 98% commitments met across the region. This level of performance continues today and far exceeds the agreed upon benchmark of 90% commitments met in each month since mid-2001 when the QCCC first opened. This success is directly attributable to the dedicated

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<sup>9</sup> The OP-3 data is from Zone 1, more densely populated areas.

<sup>10</sup> UBL provisioning options are found at URL: <http://www.qwest.com/wholesale/pcat/unloop.html>

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employees in the QCCC and the daily review meetings and analysis on missed commitments and “I-Reports.”

19. In addition to the meetings and analysis that takes place, the QCCC performs many quality checks throughout the day-to-day operations of the installation process to ensure sustained high performance. These checks include:

- QCCC supervisors perform four quality reviews of random orders per month per employee.
- QCCC management performs internal weekly audits for process compliance. These include audits on 48 hour no-dial tone (“NDT”) checks and notification via Provider Test Access (“PTA”), which is an e-mail tool utilized for CLEC notification of NDT on the day pre-wiring is performed.
- Daily reviews and conference calls on every missed commitment and “I-Report” (repair report within 30 days of installation completion). This includes root cause investigation with the field, central office and QCCC and a feedback loop to all internal stakeholders.

20. If non-compliance, as a result of human error, is detected in any of these quality checks, the QCCC manages the performance of the responsible employee. This management includes re-training and/or development of a performance plan. The performance plan includes action steps that are based on the number of non-compliance reoccurrences. Continued non-compliance may result in termination of the employee. It is important to note that within the three plus years the QCCC has existed, only one employee has been terminated for non-compliance. These process steps have led the QCCC to operate an extremely high level of quality as the performance data shows.

21. The daily reviews are conducted to research commitments met and I-Report. A readout conference call takes place where the root cause of the miss or I-Report is

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discussed and, if possible, resolved. This provides an immediate feedback loop for human error performance management and/or process gaps which are, in turn, addressed with either the employee body or the individual employee as a training opportunity. These meetings have solidified the QCCC's philosophy of high performance management standards, disciplined approach to the work task, and focus on compliance to the process, directly resulting in a sustainable high level of performance, as demonstrated in Qwest's PID results across the region for all types of unbundled loops processed through this Center.

22. The daily provisioning volumes completed in the QCCC have increased over time yet due to additional efficiencies implemented in the QCCC, staffing levels have actually decreased from a peak staffing level of 102 in February 2002 to an average 61 occupational and management employees today.<sup>11</sup> The primary driver of these efficiencies has been the internal mechanization of repetitive tasks that the Service Representative Coordinator performs. Despite the decreased staffing, performance results have stayed consistently high. While the focus of the QCCC has been on single orders, they have also successfully handled large projects by designating dedicated Service Representative Coordinators to the project and negotiating submittal volumes with the CLEC. Peak volumes are handled by moving skilled QCCC Service Representative Coordinators that may temporarily be assigned to another position.

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<sup>11</sup> There are also an additional 44 occupational and management employees working on maintenance issues.

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***B. QCCC and Large Projects***

23. One example of this is an ongoing large project that Qwest and one CLEC have been working over the past 2 years as this company continues to convert their embedded base of UNE-P customers over to its own switching platform. In the past year, this one CLEC has converted more than [REDACTED] lines utilizing the existing hot process and Qwest consistently exceeds the benchmarks set for work activities such as this at both the region-wide and individual state levels. The regional results are very representative of the state specific performance levels. Exhibit DP-5 contains the latest 12 months of loop performance data for Qwest's 14 states. Region-wide, Qwest is meeting in excess of 98% of commitments on time (far above the 90% threshold set by the Commission), migrating CLEC end users in an average of 3 minutes, and experiencing trouble on only approximately 0.75% of unbundled loops (far less than the 2% threshold set by the Commission and well below what Qwest end users are experiencing):

PID	Benchmark	June 2004	July 2004	August 2004
OP-3D	90%	98.08%	97.93%	98%
OP-5	Parity	97.9%	97.73%	Results one month in arrears
MR-8	Parity	.72%	.79%	.74%

24. Thus, Qwest's current unbundled analog loop provisioning and hot cut performance is far better than that which the Commission found gives CLECs a

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meaningful opportunity to compete in the marketplace. Based on the past performance and commitment by those staffing the QCCC, the ability to handle increased volumes should not be a basis for impairment in the absence of unbundled mass market switching. Since its inception in April 2001, the QCCC has continually demonstrated its ability to adapt to changes, take on additional unbundled loop volumes, and maintain a high level of performance, thereby giving CLECs a meaningful opportunity to compete. In addition, operational sessions such as the daily status meeting have allowed the QCCC to build into its process a daily monitoring function directed toward improving the CLEC's experience not only today but into the future. During the BHC Forum, the CLECs requested that the new process be monitored on a regular basis. The monitoring currently performed by the QCCC already provides that function. Since April of 2001, the QCCC has expanded its scope of responsibilities to accommodate basic installations along with a multitude of other loop types while the overall performance on each of these loop types and provisioning options has continued to improve. The efficiencies and experience of the QCCC staff, along with its long record of accomplishments, provide an excellent backdrop for reassuring the CLECs that orders utilizing the BHCP (both embedded and new) should expect the same level of professionalism and performance.

**VI. QWEST'S OPERATIONS SUPPORT SYSTEMS ("OSS")  
MODIFICATIONS ASSOCIATED WITH THE BHCP\_**

**A. Qwest's Current OSS**

25. Qwest's current pre-ordering and ordering functionality is provided to the CLECs through various electronic interfaces that enable them to carry out real-time

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processing while integrating pre-ordering and ordering functions, including submitting Local Service Requests (“LSRs”). CLECs can perform the following pre-ordering functions through Qwest’s interfaces: Address Validation; Customer Service Records; Service Availability; Reserve and Cancel Telephone Numbers; Facility Availability; Loop Qualification (for qualifying Qwest DSL for Resale and Unbundled Loop); Raw Loop Data; Connecting Facility Assignment; Meet Point Query; Schedule and Cancel Appointments; and Access to Directory Listings. The Commission has found in connection with each of Qwest’s section 271 applications that Qwest’s interfaces are available in a manner that affords an efficient competitor a meaningful opportunity to compete.<sup>12</sup> Each of Qwest’s electronic interfaces is described below.

**1. IMA-EDI**

26. Qwest’s IMA-EDI is a real-time, computer-to-computer, electronic interface that allows CLECs access to pre-ordering, ordering and provisioning OSS functions. It enables the electronic submission and processing of pre-ordering inquiries and Local Service Requests (“LSRs”). IMA EDI provides CLECs with uniform access to the same Qwest OSS across Qwest’s 14 state region. IMA-EDI provides electronic access directly from CLEC systems to Qwest’s interfaces, and thus enables CLECs to integrate their own OSS with the Qwest electronic interface (in addition to integrating IMA-EDI’s pre-ordering functions with IMA-EDI’s ordering functions).

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<sup>12</sup> See *Qwest 271 9-State Order* at ¶ 44; *Qwest 3-State 271 Order* at ¶ 35; *Qwest Minnesota 271*

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27. A CLEC representative using the IMA-EDI interface interacts directly with CLEC-developed software and screens. A CLEC can connect to Qwest's OSS using IMA-EDI through a direct connection such as a dedicated T-1 line. CLECs develop their own IMA-EDI translation environments to interface with Qwest's IMA-EDI gateway. These environments may be either purchased commercially or developed by the CLEC. In either case, Qwest and the CLEC test the environments to ensure that they comply with Qwest's published IMA-EDI business rules. Generally, CLEC pre-ordering transactions submitted through the IMA-EDI interface rely on the same internal systems that process Qwest Retail transactions.

28. The same IMA-EDI gateway that is used by CLECs for pre-ordering functions can be used to perform ordering transactions. As with pre-ordering, CLECs submit LSRs directly with their own software through the IMA-EDI interface, which, in turn, relays the LSR to Qwest's OSS for processing. Service orders are created as a result of CLEC LSRs submitted through the IMA-EDI interface. These service orders are processed by the same SOP that processes Qwest Retail transactions.

2. **IMA-GUI**

29. Qwest's IMA-GUI is a real time, human-to-computer, electronic interface that allows CLECs to access Qwest's OSS to perform a variety of pre-ordering, ordering and provisioning functions. The IMA-GUI facilitates

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electronic submission and processing of pre-ordering inquiries and LSRs. A CLEC can connect to Qwest's OSS using the IMA-GUI in three ways: (1) through a dial-up modem; (2) through a dedicated connection such as a T-1 line; or (3) through the Internet with digital certificate access. In effect, then, the only tools' a CLEC needs to access Qwest's OSS through the IMA-GUI is a personal computer and connectivity.

30. The IMA-GUI provides CLECs with uniform access to the same Qwest OSS across the 14-state region. Unlike IMA-EDI, the IMA-GUI allows a CLEC to obtain electronic access to various Qwest OSS pre-ordering, ordering and provisioning functionality without having to develop its own software. The use of the IMA-GUI therefore involves little to no development time and low start-up costs. The IMA-GUI is easy to use and, like IMA-EDI, provides integrated access to pre-ordering and ordering functionality. Generally CLEC pre-order transactions submitted through the IMA-GUI interface are processed by the same back-end systems that process Qwest Retail transactions.

31. The same IMA-GUI gateway that is used by CLECs for pre-ordering functions can be used to perform ordering transactions. CLECs can submit LSRs through Qwest's IMA GUI interface and interact directly with Qwest's OSS. Service orders are created as a result of CLEC LSRs submitted through the IMA-GUI interface. These service orders are processed by the same SOP that processes Qwest Retail transactions.

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32. Qwest's OSS interfaces were thoroughly tested during the various state 271 proceedings for functionality, volumes/scalability, and development/documentation across a complete set of product/activity types including, but not limited to, UNE-P, UNE-Loop ("UNE-L") and UNE-P to UNE-L conversions. State commissions retained a number of independent parties (KPMG, MTG, CGE&Y, and HP) to assist in assessing the commercial readiness of Qwest's OSS. Thirteen state regulatory agencies in Qwest's local region worked together through a multi-agency organization known as the Regional Oversight Committee ("ROC") to endorse a test, and the Arizona Corporation Commission endorsed a similar, but separate, third-party test. These tests, the commissions that sponsored them, and the Commission all concluded that Qwest provides sufficient electronic functions and manual interfaces to allow CLECs access to all of the necessary pre-ordering and ordering OSS functions.<sup>13</sup>

**B. BHC APPOINTMENT SCHEDULER AND STATUS TOOLS**

33. In addition to its current OSS tools, Qwest has agreed to implement two additional tools which will allow further efficiencies in scheduling orders and providing notification to CLECs, in the event the status on an order changes. In a joint effort with participants at the BHC Forum, the concept of additional mechanization was discussed and it was determined that 2 new tools were needed in order to further enhance the BHCP. The first tool – the Appointment Scheduler for batch scheduling – will enable the CLEC to plan and schedule conversions on a central office by central office basis in an

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<sup>13</sup> *Id.*

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orderly fashion while the second tool – the Batch Status Tool – will enable Qwest to notify the CLEC of order status and changes in an electronic format. The Status Tool is instrumental in notifying the CLEC of order completion, which then should prompt the CLEC to initiate a request for number porting. The release of both tools is contained with IMA release 16.0 which is on schedule for a mid-October 2004 release.

34. The impending development and release of these tools was conducted through the Change Management Process (“CMP”). CMP is used to process and communicate to CLECs any changes to Qwest’s OSS interfaces and to products and processes that are within the scope of CMP.<sup>14</sup> The CMP also provides CLECs the opportunity to have input into Qwest-proposed changes and to propose their own. CLECs and Qwest meet collaboratively at least two days per month to consider such change requests (“CRs”), which may include CLEC Originated CRs, Qwest Originated CRs, Industry Guideline CRs, and Regulatory CRs.<sup>15</sup> Minutes from these meetings are posted on Qwest’s CMP website<sup>16</sup> and distributed to participating CLECs regularly.<sup>17</sup>

35. The CLECs and Qwest jointly prioritize, as needed, CLEC Originated CRs, Industry Guideline CRs, and Qwest Originated CRs for OSS Interfaces and test

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<sup>14</sup> The CMP Redesign core team agreed to define the term ‘OSS Interfaces’ as “existing or new gateways (including application-to-application interfaces and Graphical User Interfaces), connectivity and system functions that support or affect the pre-order, order, provisioning, maintenance and repair, and billing capabilities for local services (local exchange services) provided by CLECs to their end users.” See CMP Document (n. 1 of every page).

<sup>15</sup> These categories of change requests are defined in the CMP Document, § 4.

<sup>16</sup> Qwest’s CMP website can be found at <http://www.qwest.com/wholesale/cmp>. Minutes of CMP team meetings are available at <http://www.qwest.com/wholesale/cmp/teammeetings.html>.

<sup>17</sup> Prior to October 2001, these meetings were held one day a month. At the request of CLECs, Qwest began holding CMP meetings two full days a month, with one day devoted to systems issues and one day devoted to products and process issues.

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environments. In addition, CLECs have the ability to prioritize certain Regulatory CRs, if Qwest determines that the changes can be implemented in more than one release and still meet the date required for implementation.<sup>18</sup>

36. Changes to Qwest OSS interfaces, products, or processes must be communicated to CLECs according to agreed-upon timeframes contained in the CMP. Qwest provides to CLECs, on a quarterly basis, its 12-month systems development view (known as the Qwest OSS Release Calendar), which shows, at a high level, the development plans for all OSS interfaces that Qwest offers to CLECs.<sup>19</sup> This information helps CLECs plan for upcoming OSS changes. Qwest regularly updates the 12-month view as more information becomes available or conditions change.

**VII. THE REGION-WIDE BATCH HOT CUT FORUM**

37. Qwest and the CLECs have always agreed that there can be only one BHCP that applies in all fourteen states in Qwest's region. From Qwest's perspective, all hot cuts across all fourteen states are managed by a single center (the QCCC) and make use of the same set of ordering and provisioning systems. From a CLEC's perspective, it is much harder to comply with different ordering and provisioning procedures in different states, and business planning is difficult when provisioning intervals and the expectations for service delivery vary from state to state. Qwest and the CLECs have agreed that the new BHCP must be implemented on a region-wide basis.

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<sup>18</sup> The prioritization process is set forth in the CMP Document, § 10.

<sup>19</sup> The OSS Release Calendar is available at <http://www.qwest.com/wholesale/cmp/osscalendar.html>.

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38. Accordingly, on October 31, 2003, AT&T, MCI, and Qwest filed a Joint Motion proposing a region-wide business-to-business forum to develop a BHCP.<sup>20</sup> Qwest and the CLECs “agree[d] that a single, uniform BHCP for all states within the Qwest region provides the most efficient and effective operating environment for both Qwest and CLECs.” The parties further agreed that “it is essential for State Commissions” — and, in fact, “all of the states” — “to endorse this process.” The point of the forum would be to attempt agreement on a process and to narrow the issues to be litigated in the individual state proceedings. The parties agreed that “[a]ll agreements reached by participants during the forum will be documented and will be binding,” and that “[i]mpasse issues . . . remaining at the conclusion of the forum process will also be documented and will be litigated before the State Commissions.”

39. No CLEC objected to this joint proposal in any of the fourteen states. All fourteen state commissions formally opted into the proposal, and representatives of the staffs of most of the state commissions attended at least some of the Forum sessions either in person or by telephone.

**VIII. THE QWEST BHCP**

40. The BHCP was developed as a new, additional installation option that permits a single CLEC to order “batches” of 25 to 100 standalone unbundled analog loops, in the same Central Office, where loop facilities are being reused and no dispatch of a Qwest

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<sup>20</sup> See *Joint Motion for Batch Hot Cut Forum*, In the Matter of the Commission Investigation Into ILEC Unbundling Obligations as a Result Of the Federal Triennial Review Order, Docket No. P-999/CI-03-961 (filed October 31, 2003).

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outside field technician is required. The standard provisioning interval for a batch hot cut is 7 business days. The existing appointment scheduler in Qwest's provisioning OSS will be enhanced to enable CLECs to electronically select their due date. Additionally, Qwest has agreed to build a web-based status tool to provide CLECs with regularly scheduled status reports concerning their BHC orders. The BHCP has been designed not only for the conversion of the embedded base of UNE-P customers, but also for the conversion and migration of newly acquired CLEC customers who have existing analog (voice) service (either Qwest retail or CLEC UNE-P or UNE-L) at present.

41. CLECs will submit LSRs as they do today with an additional field indicating that the LSR is part of a batch hot cut. By midnight on day 1 of the 7 business day interval, the CLECs will work the translations in their switches and have dial tone present on their designated CFA. The QCCC will produce a spreadsheet for the two person Central Office Technician ("COT") team that provides the COT with a summary of pertinent order information and the locations of the relevant cross connects on Qwest's frames. This information will be sorted and prioritized in a way that minimizes the COTs' travel on and between the InterConnection Distribution Frame ("ICDF") and Main Distribution Frame ("MDF") or COSMIC™ frame during pre-wiring and cutover.

42. The COTs will pre-wire the CLEC's connection to the Qwest frame on days 2 and/or 3 and test the circuit. The testing will confirm that there are no problems on Qwest's side of the circuit, confirm whether the CLEC has dial tone ("DT") present at the CFA, and (if DT exists) verify that the CLEC's CFA is good. Testing at this stage gives

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both Qwest and the CLEC an early heads-up of any problems on their respective parts of the circuit with enough time left before the actual cut (two to three days) to fix the problem. If DT is not present on any of the CLEC's lines in the batch at this step, the CLEC would be notified via the new web-based Batch Status Tool ("BST").

43. On Due Date ("DD"), the Qwest COT will once again ANI both the CLEC DT and the DT of the CLECs UNE-P customer on the COSMIC frame. If a CLEC chooses to "Trap and Trace" this ANI test, the CLEC will have instantaneous notification that the cutover of that line is about to begin. Upon finding the correct ANI and after confirming that the line is not in use, the COT will perform the lift and lay on each line. A final ANI test will be conducted at the final facility appearance in the CO. Again, if a CLEC exercises its option to "trap and trace" this ANI test, it will have instantaneous notification that the lift and lay of that line is complete and the porting of the customer's telephone number can begin. After the first lift and lay and every 25 thereafter, the COT will update the order status to reflect the order's completion, which will be reflected in the BST as well. Exhibit DP-6 displays the end-to-end process flow of a batch hot cut and associated work steps while Exhibit DP-7 is a day-by-day timeline of the 7 business day interval for the BHCP that shows the work steps performed by Qwest and the CLEC during each of the seven days.

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**IX. LINES ELIGIBLE FOR BATCH CONVERSION**

44. As previously mentioned, only those conversion orders where facilities can be reused and where no field dispatch is required are eligible for the BHCP at the reduced rate. Specifically, a CLEC can:

- Convert its own UNE-P or resale voice-only service to an analog or UNE-Loop.
- Migrate another CLEC's customer being served by UNE-P or resold Qwest voice service to an analog UNE-Loop.
- Migrate a Qwest retail voice-only customer to an analog UNE-Loop
- Migrate another CLEC's analog loop, provided the CLECs involved in the transaction coordinate the orders and re-use the existing facilities.
- Migrate Line Splitting loops to Loop Splitting when facilities are reused (no field dispatch) and the data provider and splitter equipment and terminations remain the same. Line Splitting to Loop Splitting BHC requests are included in the minimum of 25 lines per service provider per central office per day and a maximum of 100 lines for all service providers per central office per day.

45. Another loop type – loops provisioned over Integrated Digital Loop Carrier (“IDLC”) systems – can be grouped together by the CLEC in batches not exceeding 40 per day per state and will carry an IDLC premium in addition to the normal BHC non-recurring charge. This option is available to any CLEC that enters into the QPP commercial agreement or amends its interconnection agreement (“ICA”) with the BHC language, though the IDLC premium will vary depending on whether the CLEC enters into the QPP agreement or ICA amendment. Under the QPP agreement, the CLEC pays an IDLC premium on every loop migrated under the BHCP pursuant to that agreement

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(*i.e.*, not just those loops provisioned over IDLC). In contrast, under the ICA amendment, the CLEC will pay a higher IDLC premium than under the QPP agreement, but that premium will apply only to those loops provisioned over IDLC. The IDLC premium is meant to allow Qwest to recover the cost of having to dispatch a technician to the field in order to complete the work steps associated with an UNE-P residing on IDLC and converting to a UNE-Loop and falls in line with the IDLC premiums charged by other ILECs for the same types of work activity. This work requires extra, idiosyncratic steps that make it impossible to consolidate with other BHC conversions. In those instances where the UNE-P end user's facilities are currently provisioned over IDLC or in those cases where a retail or resale end user is asking to be converted to the CLEC switching platform and their service resides on IDLC, Qwest must dispatch a field technician 100% of the time to provision an unbundled loop to the customer. The dispatch is required to either obtain new facilities through a facility rearrangement, to copper or Universal DLC ("UDLC"), or to make rearrangements in the DLC through either hair-pinning, nailing the circuit up, and then eventually building an Integrated Network Access ("INA") system.

46. Each of these alternatives offer an interim process until a more permanent solution can be implemented – such as adding a Universal shelf to the existing pair gain system. In those instances where no alternatives are available, Qwest has committed, in section 9.2.2.2.1 of the Commission approved SGAT to make "every feasible effort to

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unbundle the IDLC in order to provide the Unbundled Loop for CLEC.”<sup>21</sup> Qwest delivers on this promise by implementing one of the solutions discussed above. Due to the additional complexities of converting these facilities to an unbundled loop, Qwest has asked that the CLEC utilize one of the existing provisioning options and that the work be done during normal business hours.

47. In order to change facilities from IDLC to either copper or UDLC, Qwest would be required to dispatch a technician to conduct the rearrangement within the outside plant facilities and then test the newly assigned facility to ensure continuity. This work would entail the movement of one or more jumpers or cross connections at the Feeder/Distribution Interface (“FDI”). In those cases where an INA group is already in place or where the conversion is being hair-pinned or nailed-up, Qwest would still have to dispatch a technician to the field in order to perform the same type of continuity testing and jumper movement. In many instances, the work performed on the IDLC itself is conducted by a different technician that would be doing the installation work.

48. The Commission recognized that unbundling IDLC is a difficult process. Throughout the 271 proceedings this issue was discussed in great detail, and Qwest agreed to unbundle when IDLC was present; however, Qwest explained and the CLECs generally agreed that such unbundling is a very manually intensive process that requires loop by loop analysis and handling. SGAT § 9.2.2.2.1 memorializes Qwest’s commitment to provisioning UNE-Loops when IDLC is present. Even with these difficulties, Qwest agreed to allow CLECs to group IDLC loops in batches of no more

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<sup>21</sup> Qwest Wyoming SGAT Sixth Revision, July 8, 2002, pg 124.

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than 40 lines per day per state during normal business hours. During that same session, the parties uniformly agreed that EX cables can be excluded from the BHCP.

49. During the December 2, 2003 session of the BHC Forum, Mr. John Finnegan of AT&T stated, "I don't think the CLECs are suggesting that IDLC should be part of the batch. It's a question of identifying the IDLC to exclude it from the batch."<sup>22</sup> In response to Mr. Finnegan's question, I submit the following - Qwest has *many tools* available to the CLEC today which would allow them to ascertain this type of information. The ICONN database<sup>23</sup> provides the percentage of both IDLC and UDLC compared to total line counts on a Central Office by Central Office basis. The Raw Loop Data Tool ("RLDT") gives the CLEC a more granular view of each loop on a segment by segment basis. In fact, the CLECs can run a report on an entire wire center and determine the types of facilities serving each individual end user prior to marketing within the wire center. Exhibit DP-8 is a summary of the loop qualification tools that Qwest has made available to the CLECs today. However, the Raw Loop Data Tool (RLDT) is the primary tool used by CLECs today. Exhibit DP-9 shows the frequency with which CLECs use the RLDT. CLECs access the RLDT through IMA-EDI and the IMA-GUI, which provides CLECs with the necessary loop make-up information to allow them to determine if the loop they seek to convert from UNE-P to UNE-L is provisioned over IDLC. The RLDT provides CLECs with information about loop make-up characteristics, including: address, telephone number or circuit ID, CLLI code, terminal ID, load coils,

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<sup>22</sup> 12/02/03 Tr. at 409:6

<sup>23</sup> This information can be located at URL: <http://www.qwest.com/cgi-bin/iconn/dlc.cgi>

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bridged tap, wire gauge, *pair gain devices (such as IDLC)*, cable and pair make-up, MLT distance, and actual loop length by segment. The data supporting the RLDT is obtained via QServ, which accesses LQDB, the same data source that Qwest uses to qualify Qwest Retail DSL service.

50. For those CLECs wanting to obtain loop information on a batch basis, Qwest provides access to an external website, where they can obtain bulk raw loop data by wire center. This website data, accessed outside of IMA, is referred to as the Wire Center Raw Loop Data Tool. This web-based tool provides the same fields of loop make-up information as that provided by the IMA-EDI and the IMA-GUI RLDT. Once again, the source of this data is the same as for the tool that Qwest uses to qualify its Retail DSL service.

51. During the Forum, one CLEC claimed that the information in the RLDT was not complete or accurate but provided no supporting documentation and when asked to provide specific examples, none was provided. This issue was dealt with in great detail in the Commission's 271 decisions. Qwest also makes available a manual process that permits CLECs to obtain loop make-up information if the CLEC believes that the returned loop information may be unclear or incomplete. The Commission acknowledged this as a supplemental method for verifying that a loop can support advanced loop technologies.<sup>24</sup> Qwest will perform a manual search of its back office

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<sup>24</sup> See *Qwest 9-State 271 Order* at ¶ 62 and ¶ 70 ("For these reasons, we cannot find that the RLDT's alleged unreliability denies competitors a meaningful opportunity to compete."); see also SGAT § 9.2.2.8.6. Specifically the SGAT language states:

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records, systems and databases containing loop information to obtain the loop make-up information requested by the CLEC.<sup>25</sup> If loop make-up information is missing for a particular loop segment, Qwest will investigate its outside plant engineering records for the cable and pair from the central office to the SAI and from the SAI to the customer's serving terminal. Qwest has agreed to return the loop make-up information to the CLEC electronically within 48 hours. Qwest also then will update the applicable databases with this loop make-up information. The documentation describing this issue can be found at [http://www.qwest.com/wholesale/downloads/lgrid\\_clecjobaid.pdf](http://www.qwest.com/wholesale/downloads/lgrid_clecjobaid.pdf). Appendix D of this job aid is the Request for Manual Loop-Up and provides the CLEC with detailed steps to follow if they were to make an inquiry and find either no information or unclear information. In the past 12 months, Qwest has received 610 CLEC requests for manual look-up and when comparing that to the total number of RLDT queries made by the CLEC community, it breaks down to a percentage of facilities not available or clear in

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"[i]f the Loop make-up information for a particular facility is not contained in the Loop qualification tools, if the Loop qualification tools return unclear or incomplete information, or if CLEC identifies any inaccuracy in the information returned from the Loop qualification tools, and provides Qwest with the basis for CLEC's belief that the information is inaccurate, then CLEC may request, and Qwest will perform a manual search of the company's records, back office systems and databases where Loop information resides. Qwest will provide CLEC via email, the Loop information identified during the manual search within forty-eight (48) hours of Qwest's receipt of CLEC's request for manual search. The email will contain the following Loop make-up information: composition of the Loop material; location and type of pair gain devices, the existence of any terminals, such as remote terminals or digital Loop terminals, Bridged Tap, and load coils; Loop length, and wire gauge. In the case of Loops served by digital Loop carrier, the email will provide the availability of spare feeder and distribution facilities that could be used to provision service to the Customer, including any spare facilities not connected to the Switch and Loop make-up for such spare facilities. After completion of the investigation, Qwest will load the information into the LFACS database, which will populate this Loop information into the fields in the Loop qualification tools."

<sup>25</sup> Additional details are provided in Appendix D of Exhibit LN-OSS-26 (Loop Qualification and Raw Loop Data CLEC Job Aid).

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about one half of one percent of the queries (.549). *See* Confidential Exhibit DP-10. The CLEC concern about the completeness of facility information in Qwest's RLDT does not seem to be an issue at all in light of these findings. It is also important to note that this database is the exact database which Qwest uses for its own retail customers.

52. It is also imperative to acknowledge that Qwest has been successfully unbundling these types of loops, and, in accordance with the Commission's requirements, will continue to do so as the CLEC submits these unique batches for conversion. Exhibits DP-11 and DP-11.1 are the process flow and associated legend that Qwest follows in order to provision UNE-Loops when IDLC is an issue.

**A. Batch Size**

53. Qwest has established minimum and maximum order volumes on a central office by central office basis. The minimum is a batch size of 25 lines per CLEC and the maximum is a daily central office volume limit of 100 lines total (for all CLECs) per central office. As discussed in greater detail below, the 25 line minimum is necessary to achieve efficiencies from consolidating tasks and spreading costs across cutovers, and the 100 line maximum reflects the work that dedicated, two-central office technician teams can perform in an eight hour shift. Some CLECs at the Forum expressed concern that a single invalid line at order submittal could jeopardize the other lines in the batch and result in the entire batch being rejected. To satisfy this concern, Qwest will process a batch so long as it (a) started with 25 lines or more and (b) still contains 20 lines in it

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once unqualified lines are excluded. This change was sufficient to close the issue to the CLECs' satisfaction at the Forum.

54. At the BHC Forum, several CLECs argued that a hundred-line maximum per central office per day would not be sufficient for them to convert their embedded base of UNE-P customers. This assumption ended up to be incorrect. It would only take approximately 109 business days to transition the office with the greatest number of UNE-P lines in Qwest's 14-state region using maximum daily batches of 100 lines, leaving ample time for a multitude of other conversions to take place in offices where additional migrations have been requested. Now, in light of the commercial arrangements for Qwest Platform Plus (QPP), which does not require a hot cut for conversion from UNE-P, the anticipated conversion activity is far below that which was first forecasted under the original *Triennial Review Order* timeline.

***B. Batch Scheduling***

55. Requests for conversions pursuant to the BHCP will be conducted Monday through Friday between the hours of 3:00 AM to 11:00 AM, excluding holidays. Due to concerns raised by several CLECs, Qwest has determined that it will use best efforts to complete the lift and lay activity during the first portion of the shift to mitigate service disruptions to the end user and give the CLEC ample opportunity to port the number in the early morning hours – usually before most businesses would open, and when most residential end-users are asleep. Later in the COT's shift, the COT would perform the advance pre-wiring for orders due 4 or 5 days hence. Qwest has tested this process in