

Sent by: terry.wicks@algx.com

Notice Number: PROD.07.12.02.F.00784.Analog_Loop_2_4_Wire

Comment:

Requiring dial tone from the CLEC on new loop installation when no number is porting at the same time is not necessary and should not be required before Qwest will turn over the new loop to the CLEC. For the ILEC to ensure good continuity, the only steps that are required are for the outside ILEC tech to install the loop at the demarc and when this is done contact the central office and request a short on the loop and test this with a sidekick. Once the outside technician sees the short provided by the central office, that ensures good continuity of the loop the ILEC has delivered. Allegiance is requesting that Qwest not require dial tone on new loops before turning the new loops over to the CLEC.

Sent by bjjohnson@eschelon.com

Notice Number: PROD.07.12.02.F.00784.Analog_Loop_2_4_Wire

Comment:

Eschelon objects to the process outlined in this notification. To date, Qwest has not provided the CLECs with any technical reason for requiring dial tone to test a new loop. The CLEC is ordering a loop only. Qwest can technically test for continuity on that loop without dial tone. There is additional burden placed on the CLEC to provide dial tone on the loop before they may be ready to do so. For instance, in the case of a customer moving to a different central office but same rate center and keeping the same TN, a CLEC may not have the capability to assign that TN to two different LEN in their switch. Since it is technically feasible, Eschelon requests that Qwest test new loops without CLEC providing dial tone.

Sent by byron.dowding@alltel.com

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Comment:

ALLTEL currently has submitted a change request PC061002-1 requesting that Qwest stop requiring dial tone on new unbundled loops with the basic option and signaling before turning them over to the CLEC. When a CLEC orders a new unbundled loop with basic and signaling, Qwest should provide a fault free loop checking continuity from the end user to the CLEC CFA. This is all that is needed to turn the loop over to the CLEC