

Qwest requests that this CR be re-categorized as a ~~Level 1 or~~ Level 2 change request as it consists only of language clarifications and interval improvements.

This Change Request is to highlight, announce and clarify proposed changes to the SIG that is currently available at the following URL: <http://www.qwest.com/wholesale/guides/sig/index.html>. Qwest is proposing these changes to the SIG to further clarify the state specific intervals driven by (a) state specific Wholesale Service Quality Rules and, (b) state specific US WEST/Qwest merger conditions that contain Wholesale minimum standards of performance, specifically:

- Utah Service Quality Guidelines, Rule R746-365-4. Intercarrier Service Quality.
- Colorado Service Quality Rules, Rule (4 CCR) 723-43-6. Minimum Performance Standards.
- ~~WA-Washington~~ Merger Conditions. 05/24/00 Settlement Agreement. Wholesale Service Quality.
- Minnesota Merger Conditions. 04/14/00 Stipulation and Agreement. Wholesale Service Quality.

Qwest proposes that all documentation changes described herein become effective on 05/01/02.

The following sections of the SIG will be updated as indicated below:

Unbundled Network Elements Platform - UNE-P

UNE-P PBX Trunks:

- Page 13. While the standard interval remains ICB for New Install, Conversion As Specified, Changes (ex. PIC/LPIC or feature changes, etc.), and Suspend/Restore of 25 or more trunks, "Colorado Only: Twenty-Four (24) Business Days" will be added.

UNE-P ISDN BRI:

- Page 16. While the standard interval for Add or Change Feature(s), Add Primary Directory Number (PDN) to established Loop (N2Q), Add Call Appearance remains 3 business days, "Colorado Only: Two (2) Business Days" will be added.

Unbundled Services

2-Wire Voice Grade (VG) Analog Loop:

- Page 96, 97. The standard intervals remain 5, 6 and 7 business days for 1-8, 9-16 and 17-24 lines. Removed "Colorado Only: No Dispatch - 3 business days, With Dispatch - 4 business days" as this language was included in error and has never been implemented in practice. Added intervals to reflect required Minnesota intervals where facilities do not currently exist (i.e. obligation to build). ~~Added "Utah Only: Five (5) Business Days" for all quantities. Removed "Utah Only: Five (5) Business Days" for 1-8 Lines as this language is the standard interval and therefore Utah would not be unique. Changed "Utah Only: 3 Business Days" to "Utah Only: Five (5) Business Days" for 9-16 and 17-24 Lines as the 3 day interval information was included in error and has never been implemented in practice. Removed "Utah Only: 3 business days" from 25 or more lines as this information was included in error and has never been implemented in practice.~~

4-Wire Voice Grade (VG) Analog Loop:

- Page 99. The standard intervals remain 5, 6 and 7 business days for 1-8, 9-16 and 17-24 lines. Corrected the FOC Guidelines from 72 to 24 hours. Added intervals to reflect required Minnesota intervals where facilities do not currently exist (i.e. obligation to build). Added "Utah Only: Five (5) Business Days" for ~~all quantities~~9-16 and 17-24 line quantities.

2-Wire / 4-Wire Non Loaded Loop:

- Page 100. The standard intervals remain 5, 6 and 7 business days for 1-8, 9-16 and 17-24 lines. Added intervals to reflect required Minnesota intervals where facilities do not currently exist (i.e. obligation to build). Added "Utah Only: Seven (7) Business Days" for 25 or more Lines.

Quick Loop:

- Page 102. The standard intervals remain 3 business days up to 24 lines. Added "(No Dispatch Required)" to clarify product offering. Added "Utah Only: Ten (10) Business Days" for 25 or more lines.

Quick Loop + LNP:

- Page 102. The standard intervals remain 3 and 4 business days for 1-8 and 9-24 lines. Added "(No Dispatch Required)" to clarify product offering.

DS1 Capable Loop:

- Page 103. The standard intervals remain 9 business days up to 24 lines. Added intervals to reflect required Minnesota intervals where facilities do not currently exist (i.e. obligation to build). Added "Utah Only: Five (5) Business Days" for all quantities. Removed the Colorado 5 day interval for 1-8 lines as it was included in error and replaced it with the Minnesota requirement.

DS3 Capable Loop:

- Page 105. The standard intervals remain 7 days up to 3 lines. Added intervals to reflect required Minnesota intervals where facilities do not currently exist (i.e. obligation to build). Added "Utah Only: Seven (7) Business Days" for 4 or more lines.

ADSL Compatible Loop:

- Page 106. The standard intervals remain 5, 6 and 7 business days for 1-8, 9-16 and 17-24 lines. Added intervals to reflect required Minnesota intervals where facilities do not currently exist (i.e. obligation to build). Added "Utah Only: Seven (7) Business Days" for 25 or more lines.

XDSL-I Capable Loop/ISDN-BRI Capable Loop:

- Page 108. The standard intervals remain 5, 6 and 7 business days for 1-8, 9-16 and 17-24 lines. Added intervals to reflect required Minnesota intervals where facilities do not currently exist (i.e. obligation to build). Added "Utah Only: Seven (7) Business Days" for 25 or more lines.

OCn Capable Unbundled Loops:

- Page 110. The standard intervals remain ICB. Added "Utah Only: OC3 - Fifteen (15) Business Days, OC12+ - ICB".

Unbundled Dedicated Interoffice Transport:

- Page 113-116. Added "Installation Guidelines apply where facilities/network capacity is in place. When UDIT Type or Dark Fiber facilities/network capacity is not in place, Qwest will not build facilities or hold orders to meet a request except where CLEC has implemented the CLEC Requested UNE Construction Process." Combined UDIT, UCCRE, E UDIT, and M UDIT into the same table to clarify that all intervals for these products are the same.

The following is a summary of the discussion of this Qwest initiated CR in the 04/17/02 CMP meeting:

- CLECs did not agree to re-categorize this Qwest initiated CR as a Level 2 change request as CLECs do not agree that the CR consists only of language clarifications and interval improvements. CLECs requested that this CR remain at Level 4 and that the CR Originator respond to the following questions at the next CMP meeting (in May 2000):

CLEC Question/Concern A: There are a number of instances identified in this CR where Qwest wishes to reflect a specific interval where the standard interval is currently listed as "ICB". For instance, the standard Installation Guidelines for UNE-P PBX Trunks (New Install, Conversion As Specified, Changes, Suspend/Restore) for 25 or more trunks is reflected as "ICB". Qwest proposes including "Colorado Only: Twenty Four (24) Business Days" to care for the requirements in Colorado Service Quality Rule (4 CCR) 723-43-6. However, it is possible that in the past that Qwest installed that service in some interval less than 24 business days. Therefore, this is not *necessarily* an interval reduction. The updated language should instead read, "Colorado Only: *Not To Exceed* Twenty Four (24) Business Days." [Emphasis added.]

Qwest Response A: Qwest understands the CLEC's proposal. The General Information section of the SIG on page 6 states, "This document sets forth performance guidelines, not guarantees of performance." [Emphasis added.] Further, on page 8, the SIG states, "Guidelines published in this document are for inward activity, i.e., new service, changes in service address, etc., *where facilities and/or network capacity are in place. Facilities and/or network capacity not in place will be handled on an Individual Case Basis for the due date and the firm order confirmation.*" [Emphasis added.] For consistency sake, it is Qwest's intent to add the state specific language as originally outlined in this CR to ensure that the SIG is the most comprehensive and efficient reference guide possible. In this example, Colorado Service Quality Rule (4 CCR) 723-43-6 requires that Qwest deliver 25 or more UNE-P PBX trunks within 24 business days. Qwest intends to represent this Colorado rule (and other rules where the standard guideline is ICB as originally outlined in this CR) as "Colorado Only: Twenty Four (24) Business Days". This is the way that all other interval guidelines in the SIG are represented.

It is important to note that this change in documentation only has no impact on Qwest's processes. Therefore, the interval will still be handled the same way it was in the past and if the circuit can be turned up prior to its minimum interval, Qwest will deliver that circuit in the time-frame under which it is available.

CLEC Question/Concern B: There are a number of instances identified in this CR where Qwest wishes to reflect intervals specific to Minnesota where facilities do not exist. For instance, for 2-Wire Voice Grade (VG) Analog Loop (1-8 Lines), the standard interval is "Five (5) Business Days." In this CR, Qwest proposes that the following language be included "Minnesota Only: Where Facilities are not available, Fifteen (15) Business Days." The CLECs have a number of questions and concerns about Qwest's proposal:

1. The 04/14/00 Minnesota Merger Stipulation and Agreement applies only to those CLECs who opted into that agreement.
2. In light of this standing rule, what has been Qwest's practice in the provisioning of service in the state of Minnesota? Will that process change as a result of this SIG update?
3. In light of this standing rule, how is Qwest reporting provisioning performance in MN specifically and PIDs generally? Will that process change as a result of this SIG update?
4. In light of this standing rule, how are held order statistics calculated? Will that process change as a result of this SIG update?

Qwest Response B: Qwest reasserts that all proposed SIG updates in this CR, as indicated in the 04/17/02 CMP meeting, consist only of language clarifications and interval improvements. Thus, this language clarification has no impact to current provisioning, measurement or reporting processes or practices in Minnesota or other parts of the Qwest local service region. However, Qwest will briefly address each of the CLECs questions although they are not related to this CR.

1. CLECs communicated concern that the Minnesota Merger Stipulation and Agreement applies only to those CLECs who have opted into that agreement. However, the 04/14/00 Minnesota Merger Stipulation and Agreement in the Wholesale Service Quality section requires that *any customer order* submitted by a wholesale customer is subject to the Wholesale Service Quality minimum standards of performance.
2. CLECs had questions about Qwest's compliance with provisioning requirements in Minnesota and communicated concern that Qwest's provisioning practice would change as a result of this SIG update. As indicated in the 04/17/02 CMP meeting, *this language clarification will have no impact on Qwest's provisioning practice.*
 - a. If facilities are available, Qwest will transmit a Firm Order Confirmation ("FOC") to the CLEC that reflects a due date that meets the customer's request..
 - b. If facilities are not available, Qwest will transmit a FOC to the CLEC that reflects a due date that is in keeping with the requirements of the 04/14/00 Minnesota Merger Stipulation and Agreement.
3. CLECs had questions about how Qwest is measuring and reporting provisioning performance in Minnesota specifically and for PID requirements generally. Again, this minor language clarification has no impact on Qwest's provisioning, measurement or reporting processes. Qwest remains consistent with PUC and PID reporting requirements. Data is provided pursuant to the

requirements of the 04/14/00 Minnesota Merger Stipulation and Agreement. Measurement and reporting methodologies for the third party OSS testing effort are available in those forums.

4. CLECs expressed specific concerns regarding the impact of this language clarification on held order processes and reporting requirements. Again, this minor language clarification has no impact on Qwest's provisioning, measurement or reporting processes. Qwest remains consistent with the provisions of the 04/14/00 Minnesota Merger Stipulation and Agreement.