



Walk on for November Meeting:

-----Original Message-----

From: Johnson, Bonnie J. [<mailto:bjjohnson@eschelon.com>]  
Sent: Monday, November 15, 2004 2:05 PM  
To: Bonnie Johnson; cmpcr@qwest.com  
Subject: Walk on

Eschelon and other CLECs would like to discuss the increased amount of Ad-hoc meetings that Qwest refers to as "walk-on" or "one and one" meetings with CLECs rather than the Community.

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-----Original Message-----

From: Isaacs, Kimberly D. [<mailto:kdisaacs@eschelon.com>]  
Sent: Tuesday, November 16, 2004 8:30 AM  
To: QWEST CMP MANAGER (E-mail)  
Cc: Johnson, Bonnie J.  
Subject: Walk On for CMP - CLEC Comment Cycle (LSS SL JM)

Eschelon would like to discuss a gap in the CLEC comment cycle process. Eschelon feels the CLEC comment cycle does not care for situation when a CLEC requires clarification on the proposed changes before the CLEC can form an opinion on the proposed change. Currently CLEC can submit clarifying questions during the CLEC comment cycle and has to wait for Qwest's response to those questions before they can make an informed decision about the impact of the changes. This process limits the CLECs ability to raise concerns or objections about the changes

**Note:** In cases of conflict between the changes implemented through this notification and any CLEC interconnection agreement (whether based on the Qwest SGAT or not), the rates, terms and conditions of such interconnection agreement shall prevail as between Qwest and the CLEC party.

**The Qwest Wholesale Web Site provides a comprehensive catalog of detailed information on Qwest products and services including specific descriptions on doing business with Qwest. All information provided on the site describes current activities and process. Prior to any modifications to existing activities or processes described on the web site, wholesale customers will receive written notification announcing the upcoming change.**



because the CLEC comment cycle has ended before the CLEC has all the necessary information to understand the impact of the change. I am attaching a recent example Eschelon has brought to our service manager to facilitate this conversation.

In our last Network meeting on November 3rd, 2004, Eschelon brought up a significant concern about a process Qwest was implementing regarding DSL repair. As Eschelon communicated in that meeting, Eschelon does not believe it is appropriate for Qwest to require Eschelon makes changes to or disconnect DSL that once worked for the customer. Therefore, Eschelon will not train this process Qwest implemented on 11/12/04 until Qwest does more investigation and instead expects Qwest will repair the line so the customers DSL works as it did before the repair event.

Attached below is the red line PCAT and language Qwest implemented in the PCAT.

In the event you and the DSL Technical Support Center determine that DSL speed needs to be permanently lowered in order for the DSL service to work properly, please follow the steps below:

1. An LSR will be required to change the speed of the DSL service. Use a Feature Activity (FA) of "D" for the old DSL USOC and an FA of "N" for the new DSL USOC.
2. Mark the LSR for Manual Handling and add a REMARK stating "due to a DSL repair issue, we need to lower the DSL speed". Include the DSL Technical Support Center repair ticket number in the remark. The service order for this type of repair issue will have the next Business day due date and the speed change charge will be waived.

<<PCAT\_une\_pdsl\_v27.doc>>

Attached below are Qwest's responses to Eschelon's comments and the response to Eschelon's question number 4. In that response Qwest says:

4. If at any point in time it is determined a loop no longer qualifies for DSL, the established process to remove the DSL service should be followed, which requires a C order be issued.

<<1030\_Response\_to\_comments\_ResaleV38\_UNE\_DSLV27.doc>>

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**Unbundled Network Elements—Platform (UNE-P) with Qwest Digital  
Subscriber Line (Qwest DSL™) – V27.0 ~~V26.0~~**

**History Log** (Link blue text to: [Replace Existing Download With Attached Unbundled Network Elements-Platform \(UNE-P\) – with Qwest Digital Subscriber Line \(Qwest DSL\) History Log](#))

## Product Description

Qwest Digital Subscriber Line (Qwest DSL™) service is available with [UNE-P POTS](#) (link blue text to: <http://qwest.com/wholesale/pcat/uneppots.html>), [UNE-P PBX Analog](#) (link blue text to: <http://qwest.com/wholesale/pcat/uneppbx.html>) (non-DID trunks) and [UNE-P Centrex 21](#), UNE-P Centrex Plus and UNE-P Centron. (link blue text to: <http://www.qwest.com/wholesale/pcat/uneppcentrex.html>) **Qwest DSL without voice is not available with UNE-P.**

Qwest DSL is a voice/data solution that utilizes Rate Adaptive Digital Subscriber Line (RADSL) and Asynchronous Transfer Mode (ATM) technologies to provide a line side connection allowing concurrent voice and data transmission over the same local loop. Qwest uses this technology to provide both voice capability and high-speed data transport over a single pair of copper wires. This combination allows DSL end-users continuous, dedicated access to their DSL host provider. Qwest DSL Host Volume Discount Program arrangements (providing Qwest DSL service to end-users on behalf of Volume Internet Service Providers) are not available with UNE-P with Qwest DSL.

Qwest DSL is offered in the following configurations:

| Products                 | Descriptions   |
|--------------------------|--|
| Qwest Choice DSL™        | This service utilizes a Customer Provided Equipment (CPE) modem at the end-user's premises and a dedicated Digital Subscriber Line Access Multiplexer (DSLAM) port located at the serving Central Office (CO) and provides up to 256 kilobits per second (Kbps) bi-directional data rates. |
| Qwest DSL 640K           | This service provides downstream data rates up to 640 Kbps and up to 256 Kbps upstream.  |
| Qwest Choice DSL Deluxe™ | This residential and business product provides for downstream data rates up to 1.5 Mbps and up to 1 Mbps upstream.   |
| Qwest DSL Pro Deluxe™    | This service provides downstream data rates up to 640 Kbps and up to 256 Kbps upstream with professional enhancements including Service Level Agreements (SLAs).   |
| Qwest DSL Pro™ 640K      | This service provides bi-directional data rates up to 640 Kbps upstream and downstream with professional enhancements including SLAs.  |
| Qwest DSL Pro 1M         | This service provides downstream data rates up to 1.024 megabits per second (Mbps) and up to 1 Mbps upstream with professional enhancements including SLAs.  |
| Qwest DSL Pro 4M         | This service provides downstream data rates up to 4 Mbps and up to 1 Mbps upstream with professional enhancements including SLAs.  |
| Qwest DSL Pro 7M         | This service provides downstream data rates up to 7 Mbps and up to 1 Mbps upstream with professional enhancements including SLAs.  |

Downstream speeds refer to data rates from the network to the end-user and upstream speeds refer to data rates from the end-user to the network.

DSL speed varies depending on service location, phone line qualifications, computer performance/configuration, network/internet congestion and other factors. Uninterrupted or error-free service not guaranteed.

## Availability

Qwest DSL services are available where facilities exist throughout [Qwest's 14-state local service territory](#),. (Link blue text to: <http://www.qwest.com/wholesale/pcat/territory.html>)

## Terms and Conditions

You may convert existing Qwest retail or resale services with Qwest DSL™ to UNE-P POTS, UNE-P PBX Analog (non-DID trunks) and UNE-P Centrex with Qwest DSL service. You may also request the installation of new Qwest DSL service on these services, subject to loop qualification and availability.

It is your responsibility to provide your end-user with CPE (modems, filters), marketing materials, installment instructions, and Tier 1 Technical Support.

Following retail or resale service conversion to UNE-P with Qwest DSL service, existing and installed Customer Premise Equipment (CPE) (e.g., modems, filters), will not be maintained or changed by Qwest.

## Technical Publications

Technical characteristics are described in:

- [Telcordia Generic Requirements \(GRs\)/Technical References \(TRs\)/Special Reports \(SRs\)](#), (Link blue text to: <http://telecom-info.telcordia.com/site-cgi/ido/index.html>)
- [American National Standards Institute \(ANSI\) Publications](#) (Link blue text to: <http://web.ansi.org>)
- [Qwest DSL Services, Technical Publication 77392](#) (Link blue text to: <http://www.qwest.com/techpub/77392/77392.pdf>)

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## Pricing

### Rate Structure

Qwest DSL services provided with UNE-P are available at Qwest retail rates. Discounted Qwest DSL monthly recurring charges are available. Contact your Qwest Sales Executive or Service Manager to amend your Interconnection Agreement.

### Rates

Retail rates can be found in the Federal Communications Commission (FCC) or state specific [Tariffs/Catalogs/Price Lists](#). (Link blue text to: <http://tariffs.qwest.com:8000/>)

## Tariffs, Regulations and Policies

[Tariffs, regulations and policies are located in the FCC or state specific Tariffs/Catalogs/Price Lists](#). (Link blue text to: <http://tariffs.qwest.com:8000/>)

Your Interconnection Agreement must include specific terms and conditions to purchase Qwest DSL service with UNE-P service. Contact your [Qwest Sales Executive or Service Manager](#) if you need to amend your Interconnection Agreement.

## Optional Features

There are no optional features applicable with Qwest DSL.

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## Features / Benefits

| Features  | Benefits   |
|---|--|
| Varying Qwest DSL speeds available                                      | Meets wide variety of end user transmission needs.   |
| Availability  | Permits fast, affordable offering of high speed Internet or corporate Local Area Network (LAN) access in rapidly growing, geographically diverse market areas without the cost of buying or building field facilities. |
| Uses end-user's existing telephone lines to deliver both voice and data | Provides one-stop shopping for voice and data transmission lines.  |

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## Applications

Qwest DSL is appropriate for many of the high-speed connectivity needs of today's end-users, including internet access, corporate LAN access, telecommuting, desktop videoconferencing, etc.

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## Implementation

### Product Prerequisites

If you are a new CLEC and are ready to do business with Qwest, view [Getting Started as a Facility-Based CLEC](http://www.qwest.com/wholesale/clecs/clec_index.html). (Link blue text to: [http://www.qwest.com/wholesale/clecs/clec\\_index.html](http://www.qwest.com/wholesale/clecs/clec_index.html)) If you are an existing CLEC wishing to amend your Interconnection Agreement or New Customer Questionnaire, additional information is located in the [Interconnection Agreement](http://www.qwest.com/wholesale/clecs/negotiations.html). (Link blue text to: <http://www.qwest.com/wholesale/clecs/negotiations.html>)

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### Pre-Ordering

General pre-ordering activities are described in the [Pre-Ordering Overview](http://www.qwest.com/wholesale/clecs/preordering.html). (Link blue text to: <http://www.qwest.com/wholesale/clecs/preordering.html>)

You must perform Loop Qualification by Working Telephone Number (WTN) before you submit an LSR to add new Qwest DSL service to an existing WTN. Loop Qualification is not necessary or required when converting a WTN with existing Qwest DSL service. To enable Loop qualification the new WTN must be posted to Qwest billing systems.

When a WTN does not loop qualify, you may request loop conditioning at no additional charge. When you request loop conditioning, Qwest will remove load coils and/or excessive bridged taps in an effort to qualify the WTN facility for DSL service. If Qwest determines that loop conditioning would cause degradation of the voice grade service beyond dB loss threshold standards, Qwest will not condition the WTN and will send you a jeopardy notice for the LSR.

Information regarding ADSL Loop Qualification and Qualification Characteristics may be found in [Appendix E](http://www.qwest.com/wholesale/downloads/lqrlld_clecjobaid.pdf#page=107) of the Loop Qualification and Raw Loop Data CLEC Job Aid. (Link blue text to: [http://www.qwest.com/wholesale/downloads/lqrlld\\_clecjobaid.pdf#page=107](http://www.qwest.com/wholesale/downloads/lqrlld_clecjobaid.pdf#page=107))

You must perform a Loop Qualification by address before you submit an LSR to order new Qwest DSL service at the same time and on the same LSR as you are requesting new line installation (N, C & T orders). Note that loop conditioning is not available on N & T orders or C orders adding a new line with Qwest DSL.

For additional information on Loop or Address Qualification, review the [Pre-Ordering Overview](http://www.qwest.com/wholesale/clecs/preordering.html) [/wholesale/clecs/preordering.html](http://www.qwest.com/wholesale/clecs/preordering.html)>. Loop qualification requests for 20 or more WTNs should be emailed to Qwest.

Information regarding the process is described in [Appendix E](#) of the Loop Qualification and Raw Loop Data CLEC Job Aid. (Link blue text to: [http://www.qwest.com/wholesale/downloads/lqrl\\_d\\_clecjobaid.pdf#page=107](http://www.qwest.com/wholesale/downloads/lqrl_d_clecjobaid.pdf#page=107))

If you are not an IMA user you should contact the Interconnect Service Center (ISC) at 888-796-9087 to request loop qualification by WTN or address.

Requirements for pre-ordering are described in [Local Service Ordering Guidelines \(LSOG\)](#) Pre-Order. (Link blue text to: <http://qwest.com/wholesale/clecs/lsoq.html>)

Qwest DSL Host Volume Discount Program arrangements are not available with UNE-P services. This arrangement is indicated by the presence of a DSL USOC followed by a 'DVDP' Field Identifier (FID) on the CSR. When you request conversion of an existing Retail service with this DSL arrangement to UNE-P service, Qwest will remove the DSL USOC and the DVDP FID from the account. This activity will remove end-user DSL functionality.

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## Ordering

General ordering activities are described in the [Ordering Overview](#). (Link blue text to: <http://qwest.com/wholesale/clecs/ordering.html>)

Orders should be placed using the IMA Graphical User Interface (GUI) (Link blue text to: <http://www.qwest.com/wholesale/ima/gui/index.html>), the IMA Electronic Data Interchange (EDI) (Link blue text to: <http://www.qwest.com/wholesale/ima/edi/index.html>), or faxed to 888-796-9089.

Qwest DSL service requests are submitted using the following LSOG forms:

- Local Service Request (LSR)
- End User (EU)
- Resale Service (RS)
- Centrex Resale Service (CRS), UNE-P Centrex only
- Directory Listing (DL), if applicable

Follow the field entry requirements of Resale – Qwest DSL described in the [LSOG](#). (Link blue text to: <http://qwest.com/wholesale/clecs/lsoq.html>)

When converting an existing resale or retail account with Qwest DSL to UNE-P Service with Qwest DSL, follow the [LSOG](#) (Link blue text to: <http://qwest.com/wholesale/clecs/lsoq.html>) order requirements of a UNE-P POTS, UNE-P Centrex or UNE-P PBX non DID analog trunks, Conversion as specified.

On the RS form in the MEGACENTNM field include the Mega Central Name that matches the valid Mega Central Circuit ID.

The appropriate Qwest DSL USOCs must be indicated in the FEATURE section of the RS form for UNE-P with Qwest DSL requests.

To request Loop Conditioning, enter 'Y' in the SCA field of the LSR form. ". Without an entry in the SCA field, you have not authorized Loop Conditioning. If the service does not loop qualify and if you have not authorized Loop Conditioning the order will be rejected.

If at any time, after you receive the Firm Order Confirmation (FOC) and prior to the scheduled due date, Qwest determines the qualification was a false positive (when loop qualification is successful but DSL cannot be provisioned on the line without conditioning), Qwest will make every attempt to provision the DSL request, including loop conditioning, within the original scheduled DD without requiring a supplemental LSR. In the event the conditioning work cannot be completed within the original scheduled DD, the CLEC will be notified by a jeopardy notice and required to submit a SUP, within 4 business hours, with a Y in the SCA field authorizing the standard loop conditioning

interval. Additional information on the jeopardy process can be found in *Provisioning and Installation Overview*. (Link italicized text to: <http://www.qwest.com/wholesale/clecs/provisioning.html>)

To determine Qwest DSL service USOC availability and compatibility with UNE-P POTS, Centrex, and PBX analog (non-DID) trunk service, refer to the Tariffs/Catalogs/Price Lists. Note that all Carrierless Amplitude Protocol (CAP) based DSL service has been grandparented. CAP-based DSL service on existing Retail/Resale services may be converted to UNE-P, but is not available for new installation. Discrete Multitone (DMT) based DSL service on existing Retail/Resale services may be converted to UNE-P and is available where compatible for new installations.

The following exception applies when ordering discrete multitone technology (DMT) DSL on a move (T&F) request: If the end-user's telephone number remains the same and both the new (T) and old (F) location utilize DMT technology, then two LSRs must be issued. The first LSR is submitted to set up the disconnect and service move. Upon completion of the move, a second LSR is submitted to request the DSL (DMT) at the new (T) location.

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## Provisioning and Installation

General provisioning and installation information is identified in the *Provisioning and Installation Overview*. (Link blue text to: <http://www.qwest.com/wholesale/clecs/provisioning.html>)

When you submit an LSR to order new Qwest DSL service at the same time and on the same LSR as you are requesting new line installation (N & T), note that the new line installation interval will be the same as the DSL installation interval. For service intervals refer to the *Service Interval Guide (SIG)*. (link italics to: <http://www.qwest.com/wholesale/guides/sig/index.html>)

In the event that Qwest determines that the data portion (DSL) of the request cannot be provisioned with the voice after an FOC has been issued, Qwest will send a jeopardy notice to the CLEC. Follow the jeopardy process described in the *Provisioning and Installation Overview*. (Link italicized text to: <http://www.qwest.com/wholesale/clecs/provisioning.html>)

Upon receipt of an accurate and complete LSR including authorization of Loop Conditioning, you will receive a Firm Order Confirmation (FOC) based on the standard interval found in the SIG. If at any time after you receive the FOC, and prior to the scheduled due date, Qwest determines that loop conditioning is required, Qwest will apply the Loop Conditioning interval and will re-FOC your LSR reflecting the new scheduled due date. The interval will begin on the date Qwest determines that loop conditioning is necessary and a supplemental LSR is not required.

If at any time after you receive the FOC, and prior to the scheduled due date, Qwest determines that the loop cannot be conditioned to Loop Qualify, you will receive a jeopardy notification via IMA. The jeopardy notification will provide you information on how to proceed.

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## Maintenance and Repair

General maintenance and repair activities are described in the *Maintenance and Repair Overview*. (Link blue text to: <http://www.qwest.com/wholesale/clecs/maintenance.html>)

If your end-user's Qwest DSL service is disconnected by Qwest in error during conversion activity, e.g. you have submitted an accurate and complete LSR which requests conversion of existing Qwest Retail 1FR with Qwest DSL to UNE -P POTS with Qwest DSL which results in disconnection of the Qwest DSL service, Qwest will follow DSL repair intervals to reestablish the DSL service. To report this condition either before order completion or within 72 hours of order completion, contact the *Interconnect Service Center (ISC)* (link italics to: <http://www.qwest.com/wholesale/clecs/escalations.html>). Additional information can be found in the *Service Interval Guide (SIG)* (link italics to: <http://www.qwest.com/wholesale/guides/sig/index.html>) and *Expedites and Escalations Overview* (link italics to: <http://www.qwest.com/wholesale/clecs/exescoper.html>).

In the event you and the DSL Technical Support Center determine that DSL speed needs to be permanently lowered in order for the DSL service to work properly, please follow the steps below:

1. An LSR will be required to change the speed of the DSL service. Use a Feature Activity (FA) of “D” for the old DSL USOC and an FA of “N” for the new DSL USOC.
2. Mark the LSR for Manual Handling and add a REMARK stating “due to a DSL repair issue, we need to lower the DSL speed”. Include the DSL Technical Support Center repair ticket number in the remark.

The service order for this type of repair issue will have the next Business day due date and the speed change charge will be waived.

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## Billing

Customer Records and Information System (CRIS) billing is described in [Billing Information – Customer Records and Information System \(CRIS\)](#). (Link blue text to: <http://qwest.com/wholesale/clecs/cris.html>)

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## Training

### Qwest 101: “Doing Business with Qwest”

- This introductory instructor-led training course is designed to teach the CLEC and Reseller how to do business with Qwest. It will provide a general overview of products and services, Qwest billing and support systems, processes for submitting service requests, reports, and web resource access information. [Click here to learn more about this course and to register.](#) (Link blue text to: [http://www.qwest.com/wholesale/training/ilt\\_desc\\_qwest\\_101.html](http://www.qwest.com/wholesale/training/ilt_desc_qwest_101.html))

### IMA “Hands On”

- This introductory instructor-led training course teaches you how to use Qwest's IMA Graphical User Interface (GUI) to order wholesale products. You will experience interactive software demonstrations and participate in hands-on practice sessions to familiarize yourself with the IMA GUI system. [Click here to learn more about this course and to register.](#) (Link blue text to: [http://www.qwest.com/wholesale/training/ilt\\_desc\\_ima\\_handson.html](http://www.qwest.com/wholesale/training/ilt_desc_ima_handson.html))

### Introduction to Service Requests & Billing for CLECs

- This multimedia self-directed process and systems training course is designed to provide you with information to identify the required Access Service Request (ASR) and Local Service Request (LSR) forms, and how to complete the forms to request various services from Qwest. The training is based upon case study scenarios and provides three modes of learning:
  - Tutorial
  - Practice
  - On Line Support

[Click here to learn more about this course.](#) (Link blue text to: <http://www.qwest.com/wholesale/training/tsc.html>)

### UNE-P POTS

- This instructor-led training course provides the participant with an overview of the UNE -P POTS service as well as the processes for submitting the service request via IMA. The processes covered are Pre Order, Order, Post Order, Provisioning, Billing, and CEMR Maintenance and Repair. . [Click here to learn more about this course and to register.](#) (Link blue text: [http://www.qwest.com/wholesale/training/ilt\\_desc\\_unep\\_lsr.html](http://www.qwest.com/wholesale/training/ilt_desc_unep_lsr.html))

## Unbundled Network Element- Switching

- This training course is a self-directed, web-based course that will provide you with an overview of the Unbundled Network Element- Switching product and its features. [Click here to learn more about this course and to register.](http://www.qwest.com/wholesale/training/wbt_desc_ubs.html) (Link blue text to: [http://www.qwest.com/wholesale/training/wbt\\_desc\\_ubs.html](http://www.qwest.com/wholesale/training/wbt_desc_ubs.html))

## DSL Resale via IMA

- This self-directed, web-based process and systems training course provides an overview of the DSL Resale product as well as the processes for submitting the service request via Interconnect Mediated Access (IMA). The processes covered are PreOrder, Order, Post Order, Provisioning, Billing, and CEMR Maintenance and Repair. [Click here to learn more about this course and to register.](http://www.qwest.com/wholesale/training/wbt_desc_dsl_ima.html) (Link blue text to: [http://www.qwest.com/wholesale/training/wbt\\_desc\\_dsl\\_ima.html](http://www.qwest.com/wholesale/training/wbt_desc_dsl_ima.html))

View additional Qwest courses by [clicking on Course Catalog.](http://www.qwest.com/wholesale/training/coursecatalog.html) (Link blue text to: <http://www.qwest.com/wholesale/training/coursecatalog.html>)

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## Contacts

Qwest contact information is located in [Wholesale Customer Contacts.](http://www.qwest.com/wholesale/clecs/escalations.html) (List blue text to: <http://www.qwest.com/wholesale/clecs/escalations.html>)

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## Frequently Asked Questions (FAQs)

1. **When Qwest DSL service is provisioned with compatible UNE-P services, does the end-user receive a bill from Qwest?**

The customer of record for Qwest DSL service provided with UNE -P combinations will be the CLEC. There will only be one "customer of record" for both the UNE -P and the Qwest DSL service. Qwest will not accept requests for Qwest DSL service on a UNE -P service from the end-user or any provider other than the CLEC customer of record.

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**Last Update: ~~September 27, 2004~~ November 12, 2004**

Qwest Choice DSL Deluxe™, Qwest DSL Pro™, Qwest DSL Pro Deluxe™ and Qwest DSL™ are Trademarks of Qwest Communications International, Inc.

META Tags: Resale, Digital Subscriber Line, RADSL, Centrex, Analog Trunks, DSL, IDSL, Qwest DSL, Qwest Choice DSL Deluxe, Qwest DSL Pro, DSL Pro 640K, DSL Pro 1M, DSL Pro 4M, DSL Pro 7M, DSL, Qwest Choice DSL,

## Qwest Response to Document In Review

**Response Date:** October 28, 2004  
**Document:** Product/Process: - Resale - Qwest Digital Subscriber Line (Qwest DSL) - V38.0, Unbundled Network Elements-Platform (UNE-P) with Qwest Digital Subscriber Line (Qwest DSL) - V27.0  
**Original Notification Date:** September 28, 2004  
**Notification Number:** PROD.09.28.04.F.02105.ResaleUNE\_DSL  
**Category of Change:** Level 3

Qwest recently posted proposed updates to CMP - Resale - Qwest Digital Subscriber Line (Qwest DSL) - V38.0, Unbundled Network Elements-Platform (UNE -P) with Qwest Digital Subscriber Line (Qwest DSL) - V27. CLECs were invited to provide comments to these proposed changes during a Document Review period from September 29, 2004 through October 13, 2004, 2004. The information listed below is Qwest's Response to CLEC comments provided during the review/comment cycle.

### Resources

Customer Notice Archive [http://www.qwest.com/wholesale/cmp/review\\_archive.html](http://www.qwest.com/wholesale/cmp/review_archive.html)  
 Document Review Site <http://www.qwest.com/wholesale/cmp/review.html>

If you have any questions on this subject or there are further details required, please contact Qwest's Change Management Manager at [cmpcomm@qwest.com](mailto:cmpcomm@qwest.com).

Qwest Response to Product/Process CMP - Resale - Qwest Digital Subscriber Line (Qwest DSL) - V38.0, Unbundled Network Elements-Platform (UNE-P) with Qwest Digital Subscriber Line (Qwest DSL) - V27.0 Comments

| # | Page/Section | CLEC Comment  | Qwest Response  |
|---|--------------|---|---|
| 1 |              | <p><i>Eschelon</i><br/> <i>October 13, 2004</i><br/>           Comment: 1. <i>The Maintenance and Repair section indicates that the DSL Technical Support Center and the CLEC will work together to determine if a permanent speed change is needed. What is the process the CLEC and the DSL Technical Support Center will use to make this determination and were is this documented? Will this process involve a vendor meet?</i></p> <p>2. <i>Prior to any determination regarding permanently lowering the speed of the DSL service. Eschelon would like to understand</i></p> | <p>1. The Qwest DSL Technical Support may use a variety of processes to determine if a permanent speed change is required. The technician will work on a one on one basis with the CLEC and determine the most judicious way to resolve the issue. If a field visit is required, a vendor meet may be necessary, the CLEC would be advised if this would become necessary.</p> <p>2. The IMA Loop Qualification Tool is generally not providing an inaccurate response. Qwest notes the reference in Technical Publication 77392 stating: "At the</p> |

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|  | <p><i>why the IMA Loop Qualification Tool failed to provide an accurate response when the DSL was installed. Will the IMA Loop Qualification Tool be corrected in these cases?</i></p> <p><i>3. Can a Line Station Transfer be the cause for the original repair issue? Eschelon has recently experienced two cases where DSL was up and working for our End User Customers then in the course of a repair the Qwest Technician stated the loops no longer qualified for DSL service. How does this scenario happen? Is there a process to dispute the DSL Technical Support Center's findings that will require a permanent speed change.</i></p> <p><i>4. What is required if the DSL Technical Support Center determines that the loop no longer qualifies for DSL? Would we submit a record order to remove the DSL service</i></p> | <p><i>time the customer requests a Qwest DSL? service, the customer will be advised to the class of service speeds their loop will support. The customer may then select the service speed they desire. The selected service speed will be used to software provision the central office modem for the maximum downstream and upstream line rates to be supported on the customer's line. These software settings will determine how the two (2) modems train or synchronize</i></p> <p><b>Note:</b> <i>Although the customer's line may have been provisioned for a particular maximum line rate, the modems may train up at a rate lower than the maximum due to either impairments on or characteristics of the customer's loop".</i></p> <p>3. Although there is a less than a 1% opportunity for a Line Station Transfer to cause DSL service degradation, Qwest would like to further investigate the two most recent cases Eschelon is citing and determine the cause. Please contact your Qwest Service Manager for further assistance:<br/> <a href="http://www.qwest.com/wholesale/ccdb">http://www.qwest.com/wholesale/ccdb</a></p> <p>4. If at any point in time it is determined a loop no longer qualifies for DSL, the established process to remove the DSL service should be followed, which requires a C order be issued.</p> |
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Hi,

I would like to discuss the following at the systems meeting this month. According to a PCAT notice for Market Expansion Lines V8 there is going to be a 16.01 release of IMA in December. This release has not been notified to the CLEC community. It is also not on the IMA Release calendar.

From Notice PROD.10.22.04.F.02191.ResaleMEL\_V8 stating effective DEC 6th. A process change is being documented. With the release of IMA 16.01, it is no longer necessary to populate the APPTIME or APTCON fields for MEL requests. Instructions to populate these fields for new connects is being removed.

This process change can only be accommodated by a systems change on the Qwest part due to the upfront edits. As the change noted in the Market Expansion Line PCAT could have potential coding impacts this needs to be disclosed properly to the CLEC community. This change has not been discussed with the CLEC community.

I feel Qwest did not follow the process regarding this APPTIME and APTCON coding change according to the CMP Guidelines 12.3. Also the PCAT is not a valid notification point for a potential code impacting change. I agree that this issue is one that is not working as defined by the specifications. However, I have been unable to find an associated Event notice to this issue posted on the Qwest website. If there is an Event Notice associated with this issue please explain why it is not on the Website in a pending patch status. An excerpt from Section 12.3 says:

#### 12.3 Request for a Production Support Change

Qwest will attempt to make a software patch when the system is not working as defined in the technical specifications and/or the GUI systems documentation (excluding PCAT documentation), and issue an event notification clearly defining the change.

I would like a full disclosure of what coding and programming changes Qwest is making with this point release and the pertinent information regarding when it is going to take place. It is improper for Qwest to make changes to upfront edits without proper notification to the CLEC community. It is also not a fair practice to not give the CLEC community ample notice to make systems changes on their side in response to changes Qwest is making. Per the guidelines point releases are to be non code affecting unless agreed upon by both Qwest and the CLEC Community.

Also if there is going to be a point release on December 6th as alluded to in the notice then why was the exception vote done for SCR121003-01EX to be completed on December 18th. Why would this not be done at the same time to save Qwest resources and prevent the CLECs from potentially having two downtimes of IMA at the end of the year when production times are the highest to finish meeting yearlong goals?

Thanks



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