



Escalation #E31

September 7, 2004

Liz Balvin
Covad

Subject: Covad Escalation on Qwest's position on setting aside funds and allocated hours for CLEC billing and repair changes

We received your August 23, 2004 escalation requesting "immediate implementation of prioritization of any billing and repair change request that is competing for resources." To date, we have had 2 CLECs join in your escalation. We finished our last prioritization process for the year a few weeks ago so Qwest will continue to follow our existing process for 2004. Next month we will start internally planning our 2005 CMP approach.

Qwest's position is that billing and repair changes are not OSS system interfaces as defined by the CMP governing document, and therefore the issue of prioritization of billing and repair is outside the scope of CMP. Billing and repair are functionalities of the OSS, not interfaces.

Again, Qwest invested a significant amount of resources during the past few years and brought the Wholesale OSS to a level that supports open competition. Qwest has continued to support additional changes to the OSS since receiving 271 approval. We do appreciate that you worked with Qwest to rate and rank the billing CRs that are of importance to you. We will continue to ask you to rate and rank your billing and repair CRs throughout 2004 so that Qwest has an idea of the most important requests across the CLEC community. Given the tough economic conditions in the telecommunications industry, Qwest will be researching other Change Management approaches for 2005 to ensure we are consistent with industry guidelines, standards and practices.

In summary, Qwest will stay the course in 2004 and research other industry practices for 2005 approaches and will present the Qwest approach during the 4th Quarter of this year.

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