

ISSUES BY SUBJECT MATTER – UTAH
Prepared by Eschelon April 30, 2007

1. INTERVAL CHANGES AND PLACEMENT¹ – ISSUE 1-1 and (a)-(e)

Issue 1-1 (2 options- Two Eschelon Proposals and one Qwest Proposal for same issue): Changes to Intervals -- Section 1.7.2 and Exhibits N and O

Issue 1-1 (a): Interconnection trunks -- Section 7.4.7

Issue 1-1 (b): UDIT Rearrangements -- Exhibit C, Group 2.0

Issue 1-1 (c): LIS Trunking -- Exhibit C, Group 9.0

Issue 1-1 (d): ICB Provisioning Intervals -- Exhibit I, Section 3

Issue 1-1 (e): Intervals for Loop-Mux Combination (LMC) -- Section 9.23.9.4.3 (Eschelon)/Section 24.4.4.3(Qwest), 1st provision/sentence only
The section numbers differ, because Eschelon proposes placement in Section 9 (UNEs) and Qwest proposes placement in Section 24 (Commingling). [Regarding placement of LMC, and for the open issue in the remainder of this paragraph, *see* Issue 9-61.]

2. RATE APPLICATION – ISSUE 2-3

Issue 2-3: Application of Rates in Exhibit A -- Section 2.2 (1 of 2 issues);
(Two Eschelon Proposals and one Qwest Proposal for same issue) *see also*
Section 22.0 (22.4.1.2)

3. EFFECTIVE DATE OF LEGALLY BINDING CHANGES – ISSUE 2-4

Issue 2-4: Effective Date of Legally Binding Changes -- Section 2.2 (2 of 2 issues) **(Two Eschelon Proposals and one Qwest Proposal for same issue)**

4. DESIGN CHANGES – ISSUE 4-5 and (a)-(c)

Issue 4-5: Design Changes for Loops – Sections 9.2.3.8 & 9.2.4.4.2

Issue 4-5 (a): CFA Change – Section 9.2.3.9

Issue 4-5(b): Intentionally Left Blank (Design Change rate for UDIT) – CLOSED – 6 states.

¹ *Excludes* Length of Intervals for Commingled Arrangements and Intervals for Loop-Mux combinations. *See* Issue 9-61.

Issue 4-5(c): Design Change Charge – Exhibit A, Section 9.20.13

➤ *5-7 COLLECTIVELY: “PAYMENT AND DEPOSIT”*

5. DISCONTINUATION OF ORDER PROCESSING AND DISCONNECTION – ISSUES 5-6 and 5-7 and subpart

Issue 5-6 (2 options - Two Eschelon Proposals and one Qwest Proposal for same issue): Discontinuation of Order Processing for failure to make payment - Section 5.4.2

Issue 5-7: Commission approval prior to disconnection (cross reference) – Section 5.4.3

Issue 5-7(a): Commission approval prior to disconnection – Section 5.1.13.1

6. DEPOSITS – ISSUES 5-8, 5-9, 5-11 and 5-12

Issue 5-8: De Minimus Amount – Section 5.4.5 (1 of 3 sub-issues in 5.4.5; same language for this issue appears in the first two of Eschelon’s proposals for 5.4.5)

Issue 5-9 (2 options - Two Eschelon Proposals and one Qwest Proposal for same issue): Definition of Repeatedly Delinquent – Section 5.4.5 (2 of 3 sub-issues in 5.4.5)

Issue 5-11: Disputes Before Commission – Section 5.4.5 (3 of 3 sub-issues in 5.4.5; same language in first two of Eschelon’s proposals)

Issue 5-12 (Alternative Approach to Deposits): Commission Determines Right to Deposit based on Relevant Circumstances –Section 5.4.5 (all) – **Closed portions of first two sentences by Eschelon accepting part of Qwest’s proposed language for Issue 5-12.**

Eschelon offers the language shown in Issue 5-12 (Eschelon’s Proposal #3) as an alternative to the other two Eschelon versions of 5.4.5. If this provision (Proposal #3) were adopted, there would be no de minimus or repeatedly delinquent language. This entire paragraph, if adopted, would replace all other Eschelon proposals for all of Section 5.4.5. Qwest’s counter is the same for all proposals.

7. REVIEW OF CREDIT STANDING – ISSUE 5-13

Issue 5-13 (2 options - Two Eschelon Proposals and one Qwest Proposal for same issue): Review of Credit Standing – Section 5.4.7

8. COPY OF NON-DISCLOSURE AGREEMENT – ISSUE 5-16

Issue 5-16: Non-disclosure Agreement -- Section 5.16.9.1

9. TRANSIT RECORD CHARGE AND BILL VALIDATION – ISSUES 7-18 and 7-19

Issue 7-18: Application of Transit Record Charge -- Section 7.6.3.1

Issue 7-19: Transit Record Bill Validation Detail -- Section 7.6.4

SUBJECT MATTER NO. 10 through NO 13. INTENTIONALLY LEFT BLANK ²

14. NONDISCRIMINATORY ACCESS TO UNES – ISSUE 9-31

Issue 9-31: Nondiscriminatory Access to UNEs – Section 9.1.2 (Two Eschelon proposals; one Qwest proposal)

15. INTENTIONALLY LEFT BLANK

16. NETWORK MAINTENANCE AND MODERNIZATION – ISSUES 9-33 and 9-34

Issue 9-33: Affect on End User Customers (Two Eschelon Proposals and one Qwest Proposal for same issue) -- Section 9.1.9

Issue 9-33(a): Intentionally Left Blank

Issue 9-34: Location at Which Changes Occur -- Sections 9.1.9 (Two Eschelon Proposals and one Qwest proposal for the same issue)

Issue 9-35: (CLOSED - 6 states)

Issue 9-36: (CLOSED - 6 states)

16A. WIRE CENTERS – ISSUES 9-37; 9-37(a); 9-38; 9-39; 9-40; 9-41 and 9-42

Issue 9-37: Wire Center List -- Section 9.1.13.3; Definitions of “Commission-Approved Wire Center List” and “Wire Center Docket”

Issue 9-37(a): Wire Center List – Additional Non-Impaired Wire Centers – 1st of the 2 issues in Section 9.1.14.4; 9.1.14.4.3

² Subject matter numbers that are shown as “INTENTIONALLY LEFT BLANK” were issues that were closed or renumbered through negotiations in other states.

Issue 9-38: Processing of High Capacity Loop and Transport Requests --
Section 9.1.13.4 (portion)

Issue 9-39 (except caps): Wire Center List – Review of Wire Center List –
Section 9.1.14.4.2 and subparts (except caps)

Issue 9-40: NRCs for Conversion – Sections 9.1.13.5.2, 9.1.14.6, 9.1.15.2.1

Issue 9-41: Length of Time Period - 2nd of 2 issues in Section 9.1.14.4

Issue 9-42: Rate – Section 9.1.14.4.1 and Section 9.1.14.4.2

17. INTENTIONALLY LEFT BLANK

18. CONVERSION – ISSUES 9-43 and 9-44 and (a)-(c)

Issue 9-43: Conversions - Circuit ID -- Section 9.1.15.2.3

Issue 9-44: Manner of Conversion -- Section 9.1.15.3 and subparts

Issue 9-44(a): Manner of Conversion – Use of Adder or Surcharge -- Section
9.1.15.3.1

Issue 9-44(b): Manner of Conversion – Use of USOC -- Section 9.1.15.3.1.1

Issue 9-44(c): Manner of Conversion – Same USOC -- Section 9.1.15.3.1.2

19. INTENTIONALLY LEFT BLANK

20. INTENTIONALLY LEFT BLANK

➤ *Issue 9-51 – see Subject Matter 22A below*

21. INTENTIONALLY LEFT BLANK

➤ ***Products and Services that Qwest Seeks to Phase Out: Issue 9-53 Unbundled Customer Controlled Rearrangement Element (“UCCRE”) (added two Eschelon phase out language options = three phase out options total, plus original language proposal)***

22. UNBUNDLED CUSTOMER CONTROLLED REARRANGEMENT ELEMENT (UCCRE) – ISSUE 9-53

Issue 9-53: Unbundled Customer Controlled Rearrangement Element (UCCRE) (Four Eschelon Proposals and one Qwest Proposal for same issue) – 9.9.1

22A. APPLICATION OF UDF-IOF TERMINATION (FIXED) RATE ELEMENT – ISSUE 9-51

Issue 9-51: Application of UDF-IOF Termination (Fixed) Rate Element (Two Eschelon Proposals and one Qwest Proposal for same issue) – Section 9.7.5.2.1.a

23. DIFFERENT UNE COMBINATIONS – ISSUE 9-54(a)

Issue 9-54: Intentionally Left Blank—(Sections 9.23.2 (1 of 2 issues) – CLOSED – 6 states)

Issue 9-54(a): Recurring Rates for Different UNE Combinations -- Section 9.23.5.1.3

24. LOOP-TRANSPORT COMBINATIONS – ISSUE 9-55

Issue 9-55: Combinations of Loops and Transport – Terminology -- Sections 9.23.4, 9.23.4.4; 9.23.4.4.1; 9.23.4.5; 9.23.4.6; 9.23.4.5.4. See subparts to Issue 9-58 for related issues in 9.23.4.5.1

25. SERVICE ELIGIBILITY CRITERIA – AUDITS - ISSUE 9-56

Issue 9-56: Audits - Concern -- Sections 9.23.4.3.1.1

Issue 9-56(a): Audits - Notice – Section 9.23.4.3.1.1.1.1

26. COMMINGLED EELS/ARRANGEMENTS – ISSUE 9-58 and (a)-(e) and ISSUE 59

Issue 9-58: ORDERING for Commingled Arrangements –Sections 9.23.4.5.1, 9.23.4.5.1.1

Issue 9-58 (a) and Issue 9-59 (Eschelon’s *Alternate Proposal for same issue*): CIRCUIT ID for Commingled Arrangements –Section 9.23.4.5.4 or, in the alternative, Section 9.23.4.7

Issue 9-58 (b) and 9-58(c) (Eschelon’s *Alternate Proposal for same issue*): BILLING for Commingled Arrangements -- Section 9.23.4.6.6 (and subparts)

Issue 9-58 (d): OTHER COMMINGLED ARRANGEMENTS - Ordering, Billing, and Circuit ID – Section 9.1.1.1.1 & 9.1.1.1.2

Issue 9-58(e): INTERVAL for Commingled Arrangements -- Sections 9.23.4.4.3.1 & 24.3.2; 9.1.1.1.1 & 9.1.1.1.1.1

Issue 9-59 (Eschelon alternate proposal): See 9-58(a) above, Section 9.23.4.7

27. MULTIPLEXING (LOOP-MUX COMBINATIONS) – ISSUE 9-61 and (a)-(c)

Issue 9-61: Loop-Mux Combination (LMC) – Placement [Section 9 (UNEs) or Section 24 (Commingling) of the ICA] -- Sections 9.23.9 and sub-parts; 24.4 and sub-parts; 9.23.2 (2 of 2 issues; For 1st issue, see Section 9.23.2); 9.23.4.4.3; 9.23.6.2

Issue 9-61 (a): Loop-Mux Combination (LMC) – LMC Loop versus LMC -- Sections 9.23.9 and sub-parts; 24.4 and sub-parts; 9.23.2 (2 of 2 issues; For 1st issue, see Section 9.23.2); 9.23.4.4.3; 9.23.6.2

Issue 9-61(b): LMC Multiplexing –Intervals – Section 9.23.9.4.3, 9.23.4.4.3, 9.23.6.2, Exhibit C; 24.4.4.3

Issue 9-61(c): LMC Multiplexing -- Exhibit A, Section 9.23.6.6 and subparts

28. INTENTIONALLY LEFT BLANK

29. ROOT CAUSE ANALYSIS AND ACKNOWLEDGEMENT OF MISTAKES – ISSUE 12-64 and (a)–(b)

Issue 12-64: Root Cause & Acknowledgement of Mistakes -- Section 12.1.4 and subparts (all) (Two Eschelon proposals and one Qwest proposals for the same issue.)

Issue 12-64(a): Acknowledgement of Mistakes – Qwest identification -- Section 12.1.4.2.3

Issue 12-64(b): Acknowledgement of Mistakes – Non-Confidentiality - Section 12.1.4.2.5, 12.1.4.2.6

30. INTENTIONALLY LEFT BLANK

31. EXPEDITED ORDERS – ISSUE 12-67 and (a)-(g)

Eschelon proposes addressing expediting the due date when ordering centrally in Section 12.2 (“Pre-Ordering, Ordering, and Provisioning”). Qwest proposes addressing this subject in Section 7 (“Interconnection”) and Section 9 (UNEs). Therefore, Eschelon’s language and Qwest’s counter language do not appear in the same sections of the ICA.

Issue 12-67: Expedited Orders -- Section 12.2.1.2

Issue 12-67(a): Expedited Orders – Emergencies -- Section 12.2.1.2.1 (Two Eschelon Proposals and one Qwest Proposal for the same issue)

Issue 12-67(b): Expedited Orders – Charges in Exhibit A -- Section 12.2.1.2.2 & Exhibit A

Issue 12-67(c): Expedited Orders – NRC -- Section 12.2.1.2.3

Issue 12-67 (d): Expedited Orders – UNEs -- Section 9.1.12.1 and subparts

Issue 12-67 (e): Expedited Orders – Combinations -- Section 9.23.4.5.6

Issue 12-67 (f): Expedited Orders – Trunk orders -- Section 7.3.5.2 and subparts

Issue 12-67(g): Expedite Charge -- Exhibit A, Section 9.20.14

31A. INTENTIONALLY LEFT BLANK

32. INTENTIONALLY LEFT BLANK

33. JEOPARDIES – ISSUES 12-71, 12-72, 12-73

Issue 12-71 – Jeopardy -- Section 12.2.7.2.4.4 (Two Eschelon Proposals and one Qwest Proposal for the same issue)

Issue 12-72: Jeopardy Classification (Two Eschelon Proposals and one Qwest Proposal for the same issue)-- Section 12.2.7.2.4.4.1

Issue 12-73: Jeopardy Correction -- Section 12.2.7.2.4.4.2

SUBJECT MATTERS NO. 34 through NO. 42 are now INTENTIONALLY LEFT BLANK

43. CONTROLLED PRODUCTION – ISSUE 12-87

Issue 12-87: Controlled Production (Two Eschelon Proposals – One Qwest Proposal for the same issue) - Section 12.6.9.4

44. RATES FOR SERVICES – ISSUE 22-88 and (a) and 22-89

Issue 22-88: Rates in Exhibit A -- Section 22.1.1

Issue 22-88(a): IntraLATA Toll Traffic -- Exhibit A Section 7.11

Issue 22-89: Request for Cost Proceeding – Section 22.4.1.3

45. UNAPPROVED RATES – ISSUE 22-90 and (a)-(l)

Issue 22-90: Unapproved Rates - Notice and Cost Support (Two Eschelon Proposals - One Qwest Proposal for this issue) -- Section 22.6.1; 22.6.1.1

Issue 22-90(a): Adjustments for prior Commission decision – Sections 8.1.1.2; 8.3.2.7.5; 8.3.2.7.6; 8.3.2.7.7; 8.3.2.7.8 and 8.8.1.

Issue 22-90(b): Collocation Cost Study Adjustments – Sections 8.1.14; 8.6.1.1; 8.6.1.2; 8.6.2.2.1; 8.7.1.2 and 8.7.2.4.

Issue 22-90(c): ICDF Collocation and Special Sites – Sections 8.8.4 (Nonrecurring); 8.15.2.1; 8.15.2.2.

Issue 22-90(d): DC Power Reduction – Sections 8.13.1.1; 8.13.1.2 and subparts; 8.13.1.3; 8.13.1.4; 8.13.1.5 and 8.13.2 and subparts.

Issue 22-90(e): NRC Cost Study Adjustments – Sections 9.6.12; 9.7.6; 9.23.6.2.1.1; 9.23.6.2.1.2; 9.23.6.3.1.1; 9.23.6.3.1.2; 9.23.6.4.1.1; 9.23.6.4.1.2; 9.23.6.8.1; 9.23.6.8.2; 9.23.7.7.1; 9.23.7.7.2 and 10.7.10.

46. INTENTIONALLY LEFT BLANK

47. INTENTIONALLY LEFT BLANK