

Archived System CR SCR083005-01 Detail**Title: Implement Edits Related to TRRO (FCC 04-290)**

CR Number	Current Status Date	Level of Effort	Interface/ Release No.	Area Impacted	Products Impacted
SCR083005-01	Withdrawn 3/15/2006	1500 - 2000	IMA Common/	Ordering	UBL, EEL, LMC, DS1 & DS3 Loop and/or Transport

Originator: Hooper, Sami**Originator Company Name:** Qwest Corporation**Owner:** Hooper, Sami**Director:** Bliss, Susan**CR PM:** Esquibel-Reed, Peggy**Description Of Change**

This is a Regulatory Change Request.

The FCC's Triennial Review Remand Order (TRRO), FCC 04-290 (WC Docket No. 04-313 and CC Docket No. 01-338) released February 4, 2005, modified the rules under which Qwest is required to offer DS1 and DS3, loops and transport as Unbundled Network Elements (UNEs) pursuant to section 251(c)(3) of the Telecommunications Act of 1934, as amended. The FCC ordered impairment criteria impacts DS1 and DS3 loops and transport. Due to the volume of customers that have opted into the TRRO Amendment, Qwest needs to implement edits in those states, for those customer's, where a TRRO has been filed, in their states.

No new or conversion activity is allowed in non-impaired offices on Unbundled Loop, EEL, and Loop Mux Combination (LMC). DS1 and DS3 loops and/or transport will be identified by wire center where the requirements of full competition are met.

This CR will install an edit in IMA to reject requests for service in non-impaired offices on UBL, EEL, LMC, DS1 and DS3 loop and/or transport.

Additionally, on EEL and LMC the SPEC field on the LSR will be utilized to identify the request as EEL Loop, EEL Multiplexer, LMC Loop, or LMC Multiplexer. The product name in IMA for these products will be updated from EEL/UNE Combination to EEL/LMC to match the names in the product catalogs.

Expected Deliverable:

Requested Implementation is the IMA 19.0 Release, April 2006, due to the volume of customers that have opted into the TRRO Amendment, Qwest needs to implement edits in those states, for those customer's, where a TRRO has been filed, in their states.

Status History

Date	Action	Description
8/30/2005	CR Submitted	
8/30/2005	CR Acknowledged	
8/31/2005	Communicator Issued	CMPR.08.31.05.F.03232.RegulatoryCRSubmitted
9/6/2005	Clarification Meeting Held	
9/21/2005	Discussed at Monthly CMP Meeting	Discussed at the September Systems CMP Monthly Meeting; please see the September Systems CMP Distribution Package, Attachment D
3/15/2006	Discussed at Monthly CMP Meeting	Discussed at the March Systems CMP Monthly Meeting; please see the March Systems CMP Distribution Package, Attachment G

Project Meetings

March 15, 2006 Systems CMP Meeting Discussion: Jill Martain-Qwest stated that this CR had been out for awhile, is currently in deferred status, and stated that Qwest would now like to withdraw this CR. Jill stated that if Qwest determines, at a later date, that a system enhancement is needed, Qwest would issue another CR. This CR is in withdrawn status.

September 21, 2005 Systems CMP Meeting Discussion: Jill Martain/Qwest stated that based on other issues that are in progress, in and outside of CMP, Qwest will defer this CR and will remove the Regulatory (RG) classification. Jill stated that once the issues are resolved, the CR will be taken out of deferred status and we would have further discussions regarding this Change Request. Jill noted that there is no need for a vote to take place during the September Monthly CMP Meeting. There were no questions or comments. This CR is in Deferred Status.

-- September 8, 2005 Email Received from Covad: Covad objects to the "regulatory" classification of SCR083005-01. To preface, the CMP document clearly spells out the scope of regulatory CRs and the process for a regulatory designation and this change request does not meet those qualifications. In addition, Covad believes a regulatory designation is inappropriate due to the following:

(a) Currently, Qwest is obligated to provision all orders for services out of arguably unimpaired COs so edits attempting to prevent ordering out of COs Qwest has unilaterally designates as unimpaired is impermissible;

(b) the good faith, self-certification requirement imposed by the TRRO for ordering should accommodate any concerns Qwest may have regarding orders placed out of arguably unimpaired COs; and (c) since Qwest, to date, has made it impossible for any CLEC or state commission to validate whether a CO is unimpaired further reinforces that the only legitimate way to accommodate arguable changes of law resulting from the TRRO is the self-certification process.

Since Covad has not yet executed the TRRO amendment, and since Qwest has not articulated any legitimate reason for using system edits versus the self-certification process, Covad believes that Qwest may not permissibly use any system edits for orders placed by Covad. Thanks, Liz Balvin Covad Communications

September 6, 2005 Email Received from Eschelon: Eschelon objects to the classification of this CR as a Regulatory CR. Qwest's CR is response to freely negotiated amendments. These were negotiated without arbitration. Qwest was not ordered to limit its product availability and could do more. The FCC sets out a minimum. In addition, this change is contrary to the FCC's self certification process. Under that process, Qwest cannot reject an order when the CLEC self certifies. If Qwest and other CLEC's have agreed to a different process that is voluntary and does not support a Regulatory CR. Eschelon understands that the changes apply only to certain customers that signed the TRO amendment., therefore, the edits/changes, in any event, will not apply to Eschelon or ATI. Bonnie J. Johnson Director Carrier Relations Eschelon Telecom, Inc.

September 1, 2005 Email Received from AT&T: AT&T objects to the treatment of the Qwest-originated change request SCR083005-01RG as a Regulatory Change pursuant to the Change

Management Process. Section 4.1 defines a regulatory change: 4.1 Regulatory Change A Regulatory Change is mandated by regulatory or legal entities, such as the Federal Communications Commission (FCC), a state commission/authority, or state and federal courts. Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings. Either the CLEC or Qwest may originate the Change Request. The definition states that the "Regulatory changes are not voluntary but are requisite to comply with newly passed legislation, regulatory requirements, or court rulings." The FCC's Triennial Review Remand Order Qwest referenced in Qwest's CR simply relieved Qwest of certain obligations under federal law. That ruling did not mandate that Qwest no longer provide the products and services relating to those obligations. Qwest has voluntarily chosen to cease providing these services. As such, this Qwest CR does not qualify as a Regulatory Change under the CMP. If Qwest wishes to pursue these changes, Qwest's CR must be treated as any other systems CR. Sharon Van Meter AT&T Western Region GAM 303-699-6483 303-540-1637 (pager)

September 1, 2005 Clarification: Introduction of Attendees: Sami Hooper-Qwest, Jill Martain-Qwest, Peggy Esquibel Reed-Qwest

Review Requested (Description of) Change: Peggy Esquibel Reed-Qwest reviewed the CR and asked if there was additional information. Sami Hooper-Qwest stated that there is no additional information.

Confirmed Impacted Area(s): Peggy Esquibel Reed-Qwest confirmed that this request is for Ordering.

Confirmed Impacted Interfaces: Peggy Esquibel Reed-Qwest confirmed that this is an impact to IMA Common.

Confirmed Impacted Products: Peggy Esquibel Reed-Qwest confirmed the impacted products UBL, EEL, LMC, DS1 & DS3 Loop and/or Transport.

Establish Action Plan & Resolution Time Frame: Peggy Esquibel Reed-Qwest stated that Sami will present this CR at the September 21, 2005 Systems CMP Meeting. Peggy then noted that the Regulatory Notice was sent on 8/31 and that the deadline for objections, for the Regulatory classification, is 5:00 p.m. MT, September 8th.

- August 31, 2005 Regulatory Notification Sent: CMPR.08.31.05.F.03232.RegulatoryCRSubmitted

QWEST Response