

Open Product/Process CR PC102704-1ES Detail

Title: CR 1: New Revised title effective 1/11/05: Certain Unbundled Network Elements (UNE) Product Discontinuance (see Description of Change for previous title) CR 2 = PC102704-1ES2

CR Number	Current Status Date	Area Impacted	Products Impacted
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PC102704-1ES	Completed 3/23/2007	Provisioning, Ordering	See Description of Change
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Originator: Whitt, Michael

Originator Company Name: Qwest Corporation

Owner: Buckmaster, Cindy

Director: Hooks, Perry

CR PM: Esquibel-Reed, Peggy

Description Of Change

DOCUMENTATION FOR THIS CR IS CONTINUED ON PC102704-1ES2

Revised Description of Change effective 3/23/07:

The following products, from the original CR, are removed from this Change Request and were not completed with this CR. The effort for these products may occur via separate CRs.

Unbundled Local Loop-General Information

Unbundled Local Loop-Digital Signal Level 1 (DS1) Capable Loop

Unbundled Local Loop-Digital Signal Level 3 (DS3) Capable Loop

Enhanced Extended Loop (EEL)

Loop MUX Combination (LMC)

Unbundled Dark Fiber (UDF)

Unbundled Dedicated Interoffice Transport (UDIT)

Unbundled Customer Controlled Rearrangement Element (UCCRE)

Revised Description of Change effective 3/1/05:

This CR will be implemented as a product/process CR as there are no CLEC facing system changes.

This CR details changes to availability of certain Unbundled Network Elements (UNE) products.

The following UNE products are no longer available to CLECs unless the most current effective version of the CLEC's Interconnection

Agreement (ICA) of Amendment includes terms, conditions, and pricing for the products before 6/14/04.

Unbundled Network Element (UNE)- Switching (UBS)
<http://www.qwest.com/wholesale/pcat/unswitch.html>

Unbundled Network Elements- Platform (UNE-P)-General Information
<http://www.qwest.com/wholesale/pcat/unep.html>

Unbundled Network Elements - Platform (UNE-P) - Integrated Services Digital Network (ISDN) Basic Rate Interface (BRI)

<http://www.qwest.com/wholesale/pcat/unepisdnbri.html>

Unbundled Network Elements-Platform (UNE-P)-Centrex
<http://www.qwest.com/wholesale/pcat/unepcentrex.html>

Unbundled Network Elements-Platform (UNE-P)-Public Access Lines (PAL)
<http://www.qwest.com/wholesale/pcat/uneppal.html>

Unbundled Network Elements- Platform (UNE-P)- Private Branch Exchange (PBX) Trunks
<http://www.qwest.com/wholesale/pcat/uneppbx.html>

Unbundled Network Elements - Platform (UNE-P)-Plain Old Telephone Service (POTS)
<http://www.qwest.com/wholesale/pcat/uneppots.html>

Unbundled Network Elements - Platform (UNE-P) - Digital Switched Service (DSS)
<http://www.qwest.com/wholesale/pcat/unepdss.html>

Unbundled Network Elements -Platform (UNE-P) - Integrated Services Digital Network (ISDN) Primary Rate Interface (PRI)

<http://www.qwest.com/wholesale/pcat/unepisdnpri.html>

The remaining products on this CR are being revised due to changes based on the FCC Order received 2/4/05. The following products will be revised and will be noticed on a future date associated with this change request.

Unbundled Local Loop-General Information

Unbundled Local Loop-Digital Signal Level 1 (DS1) Capable Loop

Unbundled Local Loop-Digital Signal Level 3 (DS3) Capable Loop

Enhanced Extended Loop (EEL)

Loop MUX Combination (LMC)

Unbundled Dark Fiber (UDF)

Unbundled Dedicated Interoffice Transport (UDIT)

Unbundled Customer Controlled Rearrangement Element (UCCRE)

As always, any future changes of law may impact this notification and will be supported by the applicable notification.

Expected Deliverables/Proposed Implementation Date (if applicable):

Implement PCAT changes retroactive to 6-15-04 subject to CMP Guidelines

Revised Description of Change effective 1/11/05:

This CR will be implemented as a product/process CR as there are no CLEC facing system changes.

This CR details changes to availability of certain Unbundled Network Elements (UNE) products.

The following UNE products are no longer available to CLECs unless the most current effective version of the CLEC's Interconnection Agreement (ICA) of Amendment includes terms, conditions, and pricing for the products before 6/14/04.

-All Enterprise and Mass Market Unbundled Network Elements Switching (UBS) products, detailed in the following Product Catalog

(PCAT): <http://www.qwest.com/wholesale/pcat/unswitch.html>

-All Enterprise and Mass Market Unbundled Network Elements-Platform (UNE-P) products, detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/unep.html>

-DS1 Unbundled Loop detailed in the following PCAT:
<http://www.qwest.com/wholesale/pcat/unloopds1caploop.html>

-DS3 Unbundled Loop detailed in the following PCAT:
<http://www.qwest.com/wholesale/pcat/unloopds3caploop.html>

-Unbundled Dark Fiber (UDF), including E-UDF and Meet-Point UDF, detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/darkfiber.html>

-DS1 and DS3 Unbundled Dedicated Interoffice Transport (UDIT), including E-UDIT

and M-UDIT, detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/udit.html>

-DS1 and DS3 Enhanced Extended Loop (EEL) detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/eel.html>

-Unbundled Customer Controlled Rearrangement Element (UCCRE) detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/uccre.html>

-DS1 and DS3 Loop Mux Combo detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/lmc.html>

As always, any future changes of law may impact this notification and will be supported by the applicable notification.

Expected Deliverables/Proposed Implementation Date (if applicable):

Implement PCAT changes retroactive to 6-15-04 subject to CMP Guidelines

Previous Title and CR Description of Change - see below for information prior to 1/10/05. This CR was Revised on 1/11/05

Previous Title:

U.S. Court of Appeals for the DC Circuit decision (USTA II) Decision No. 00-1012, and FCC Interim Rules Compliance: Certain Unbundled Network Elements (UNE) Product Discontinuance

Previous Description of Change:

This CR will be implemented as a product/process CR as there are no CLEC facing system changes.

This CR details changes to availability of certain Unbundled Network Elements (UNE) products pursuant to the U.S. Court of Appeals for the DC Circuit decision 00-1012 ('USTA II') which vacated some of the FCC's unbundling rules, and the subsequent FCC Interim Rules which preserved some of the unbundling rules vacated in USTA II.

In accordance with these orders and findings, the following UNE products are no longer available to CLECs unless the most current, effective version of the CLEC's Interconnection Agreement (ICA) or Amendment includes terms, conditions, and pricing for the products before 6/15/04:

-All Enterprise and Mass Market Unbundled Network Elements Switching (UBS) products, detailed in the following Product Catalog (PCAT):

<http://www.qwest.com/wholesale/pcat/unswitch.html>

-All Enterprise and Mass Market Unbundled Network Elements-Platform (UNE-P) products, detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/unep.html>

-DS1 Unbundled Loop detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/unloopds1caploop.html>

-DS3 Unbundled Loop detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/unloopds3caploop.html>

-Unbundled Dark Fiber (UDF), including E-UDF and Meet-Point UDF, detailed in the following PCAT: <http://www.qwest.com/wholesale/pcat/darkfiber.html>

-DS1 and DS3 Unbundled Dedicated Interoffice Transport (UDIT), including E-UDIT and M-UDIT, detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/udit.html>

-DS1 and DS3 Enhanced Extended Loop (EEL) detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/eel.html>

-Unbundled Customer Controlled Rearrangement Element (UCCRE) detailed in the following PCAT: <http://www.qwest.com/wholesale/pcat/uccre.html>

-DS1 and DS3 Loop Mux Combo detailed in the following PCAT:

<http://www.qwest.com/wholesale/pcat/lmc.html>

Expected Deliverables/Proposed Implementation Date (if applicable):

Retroactive to 6/15/04 pursuant to FCC Interim Rules, subject to CMP Guidelines.

Status History

Date	Action	Description
10/27/2004		CR Received
10/29/2004		CR Acknowledged
10/29/2004		Customer contacted / clarification held
10/29/2004		CMPR.10.29.04.F.02250.Regulatory_CR_FCC_Interim
11/2/2004		CMPR.11.02.04.F.02261.Regulatory_CR_FCC_Interim
11/4/2004		Revised the CR to remove regulatory classification
11/4/2004		CMPR.11.04.04.F.02273.Regulatory_CR_FCC_Interim
11/9/2004		CMPR.11.09.04.F.02287.Escalation Notification
11/9/2004		Escalation received/posted to web http://www.qwest.com/wholesale/cmp/escalations.html
11/10/2004		Revised the CR title, description, scope in the database
11/17/2004		November CMP Meeting minutes will be posted to the database

12/15/2004		December CMP Meeting minutes will be posted to the database
1/4/2005		Oversight Meeting held URL for Oversight: http://www.qwest.com/wholesale/cmp/coc.html
1/10/2005		Oversight Meeting held URL for Oversight: http://www.qwest.com/wholesale/cmp/coc.html
1/11/2005		Added url to Status History for Escalation and Oversight Meeting information and documentation. Please review the below url for additional project information. URL for Escalations: http://www.qwest.com/wholesale/cmp/escalations.html URL for Oversight: http://www.qwest.com/wholesale/cmp/coc.html
1/18/2005		CMPR.01.18.05.F.02487.AdHocMeeting
1/19/2005		Discussed in the January Product Process Monthly CMP Meeting
1/25/2005		Ad Hoc Meeting Held
2/1/2005		PROD.02.01.05.F.02515.MultiplePCATs_CR Related
2/16/2005		Discussed in the February Product Process Monthly CMP Meeting
3/1/2005		Revision made to CR
3/3/2005		PROD.03.03.05.F.02628.FNL-MultiplePCATs_CR_Relation (Final Notice and Qwest Response to Comments)
3/16/2005		Discussed in the Monthly Product/Process CMP Meeting
3/21/2005		Status Changed to CLEC Test, as agreed at the March CMP Meeting, Due to the Implementation of Part 1.
4/20/2005		Discussed in the Monthly Product/Process CMP Meeting
5/18/2005		Discussed in the Monthly Product Process CMP Meeting
6/14/2005		CMPR.06.14.05.F.03015.TRO_TRRO_Ad_Hoc_Meeting
6/15/2005		Discussed in the Monthly Product Process CMP Meeting
6/20/2005		CMPR..6.20.05.F.03042.AdHocMeetingRescheduled
6/30/2005		Ad Hoc Meeting Held
7/20/2005		Discussed in the Monthly Product Process CMP Meeting
8/17/2005		Discussed in the Monthly Product Process CMP Meeting
9/21/2005		Discussed in the Monthly Product Process CMP Meeting
9/29/2005		PROS.09.29.05.F.03322.TRRO_USERID_Passwaord
10/19/2005		Discussed in the Monthly Product Process CMP Meeting
10/25/2005		PROD.10.25.05.F.03400.TRRO_EEL_V2
11/16/2005		Discussed in the Monthly Product Process CMP Meeting
12/14/2005		Discussed in the Monthly Product Process CMP Meeting
1/18/2006		Discussed in the Monthly Product Process CMP Meeting
11/9/2006		Status Changed from Deferred to CLEC Test, for Discussion in the November 15, 2006 CMP Meeting
11/15/2006		Discussed in the November Monthly Product Process CMP Meeting.

11/16/2006		CMPR.11.16.06.F.04340.Ad_Hoc_Meeting
11/27/2006		Ad Hoc Meeting Held
12/5/2006		Matrix Emailed to Call Participants
12/6/2006		Emailed Received from Eschelon: May not agree with the Matrix and are Reviewing Further.
12/7/2006		CMPR.12.07.06.F.04394.Ad_hoc_meeting: Included Matrix and Info for Next Call, on Jan. 3, 2007
12/14/2006		Discussed in the December Monthly Product Process CMP Meeting.
12/14/2006		CMPR.12.14.06.F.04405.Ad_hoc_meeting_RESCHEДУLED
1/30/2007	Related Change Request	PC102704-1ES2
1/30/2007	Record Update	Documentation for this CR is continued on PC102704-1ES2
1/17/2007	Discussed at Monthly CMP Meeting	Discussed in the January Monthly Product Process CMP Meeting.
12/15/2006	Communicator Issued	CMPR.12.15.06.F.04413.AdHocMeeting_CORRECTION
3/23/2007	Record Update	CR Revised to remove Products from this CR
3/28/2007	Related Change Request	PC032707-1 and PC032807-1
3/5/2007	Related Change Request	PC013007-1
3/5/2007	Related Change Request	PC013007-2
4/20/2007	Related Change Request	PC041907-1

Project Meetings

DOCUMENTATION FOR THIS CR IS CONTINUED ON PC102704-1ES2

12-14-06 Prod Proc CMP Mtg: Mark C-Qwest stated that this CR is in Development status & that an ad hoc call was held a few weeks ago which resulted in the creation & distribution of a product matrix being provided to the CLECs. Mark stated that Qwest is awaiting feedback, on the matrix and then will regroup internally & evaluate. Mark then stated that the next ad hoc call is scheduled for January 11th. Mark asked for questions or comments. Bonnie J-Eschelon asked if Qwest could outline what is going to happen with the items in each of the four buckets. Bonnie asked for Qwest's proposal for each of the buckets. Cindy B-Qwest stated that as previously mentioned, discussions would take place in the ad hoc mtgs & noted that Qwest has no set plan. [Comment from Eschelon: Cindy B-Qwest stated that as previously mentioned, discussions would take place in the ad hoc meetings & noted that Qwest has no strategic plan.] Cindy stated that Qwest is waiting for concurrence on the list & feedback on

where each item belongs; we can then proceed. Cindy stated that this effort is casual & that Qwest does not want to dictate the flow of the ad hoc mtgs. [Comment from Eschelon: Cindy stated that Qwest is coming at this very casually & that Qwest does not want to dictate the flow of the ad hoc mtgs.] Cindy asked if that answered Eschelon's question. Bonnie J-Eschelon stated that in regard to Qwest's proposal, she is hearing that Qwest does not really have one. Cindy B-Qwest stated that was correct. Cindy suggested that we move forward with the discussions & noted that everyone was now aware of the classifications, including buckets 2&3. Cindy stated that some items, in buckets 2&3, could also end up in bucket 4. Cindy then stated that items that are in litigation are not open for discussion at this time. Cindy stated that buckets 2&3 will be the focus, unless they are in litigation. Bonnie J-Eschelon thanked Cindy for the information & stated that all, except Unbundled Dark Fiber, are currently in litigation. [Comment from Eschelon: Bonnie J-Eschelon thanked Cindy for the information & stated that Eschelon believes that products all, with possibly the exception of Unbundled Dark Fiber, are currently in litigation.] Cindy B-Qwest stated that we would discuss that in the ad hoc mtg. Lynn O-Covad asked when the matrix was sent. Cindy B-Qwest stated that it was sent a few weeks ago. Susan L-Qwest stated that it was provided via email to the call participants on 12/9 & was provided via a notification on 12/7. There were no additional questions or comments.

11-27-06 Ad Hoc Mtg: Kim Isaacs-Eschelon, Sherry Krewett-McLeod, Doug Denney-Eschelon, Laurie Fredricksen-Integra, Sheila Harris-Integra, Kathy Lee-ATT, Kelly Leveritch-Elec Light Wave, Bonnie Johnson-Eschelon, Peggy Esquibel Reed-Qwest, Cindy Buckmaster-Qwest, Mark Nickell-Qwest, Candace Mowers-Qwest, Vicki Dryden-Qwest, Susan Lorence-Qwest, Karen Ferguson-Qwest. Discussion: Peg ER-Qwest stated that this CR that was submitted, by Qwest, in 10-04 for the discontinuance of certain UNE Products. Peg then stated that some products on this CR were implemented & that some of the products were put on hold & the CR was placed in Deferred Status. Peg then noted that at the October Monthly CMP Meeting, Qwest stated that we wanted to take this CR out of deferred status & to start conversations around how to move forward. This CR was placed in CLEC Test. Peg stated that we then received an email in regard to the CR being in CLEC Test status & the thought that Presented might be more appropriate. Peg stated that the CR was changed from Deferred to CLEC Test due to the implementation of this change for 9 UNE Prods on 3-18-05. There are 8 remaining products on the current CR & noted that Qwest agrees that it is not yet appropriate to ask for closure & that additional discussions are needed & that is what today's meeting is for. Peg then stated that Presented was not an appropriate status, due to the partial implementation of this CR. Peg stated that Presented was for new CRs, after they have been presented in a Monthly CMP Meeting. Peg stated that if the CLECs are uncomfortable with the CLEC Test Status, that the status could be changed to Development. Bonnie J-Eschelon asked if the status could be changed to Evaluation. Peg ER-Qwest stated that CRs in similar situations have been placed in Development status. Bonnie J-Eschelon stated that she would check the CMP Document & would send an email with her decision. Peg ER-Qwest advised Bonnie J-Eschelon to send her email to the cmpcr mailbox, & then turned the call over to Cindy B-Qwest. Cindy B-Qwest stated that she would tee-up the subject in order to introduce & discuss the items that were deferred in 2005. Cindy then stated that she has a suggested approach & noted that she has no structure, agenda, or intention. She wants to talk about subjects to discuss, the order, & grouping. Once the participants decide, we could set an agenda for future meetings. Cindy stated that if subjects are grouped, we would like to work CRs one at a time, from submission to completion. Cindy stated that it would help eliminate confusion & that discussions would be focused on the topic that is current at that time. Cindy then

asked the call participants for feedback & suggestions. Bonnie J-Eschelon stated at the October CMP Meeting that there were some products that needed to be addressed & suggested that is where to start the discussion. Cindy B-Qwest stated that the discussions could start there because we need to talk about what is not currently under the ruling, arbitration, on the wire center list, or items that are not currently in the CMP process. Cindy gave examples of OCN, UBL, & Unbundled Packet Switching. Cindy stated that those are not available or that there is no volume. Cindy noted that there could be small elements at the TRRO level. Cindy stated that these discussions should be unstructured & stated that there is no list. Cindy then stated that she wanted to get the CLECs interests & would then go from there. Bonnie J-Eschelon asked which products were completed & which were not completed on the current CR & asked if they could get a list. Susan L stated that she would get the information from the Final Notification & would provide the information later on the call. Cindy B-Qwest stated that the CR is a tracking mechanism for what was implemented & what was not. Cindy stated that this discussion is related only to Local Service products therefore there are items that will not to be discussed on this call, such as 800 data base query. Cindy stated that other Product Managers may want to be addressing those items. Cindy provided examples of EEL, Comingling, LMC, DS1/DS3 Transport, Optical Carrier Level UDIT, UCCRE, Line Sharing, Unbundled Packet Switching, Fiber to the Curb, & others. Cindy asked if the CLECs were asking for a list of all impacted products that will be discussed on this call. CLECs responded yes. Cindy B stated that she could not discuss the products that she is not responsible for. Sheila H-Integra stated that she would like a list of what was implemented, what is left, what products would be discussed on these calls, & which products would not be discussed. Susan L-Qwest read the list from the current CR of what was implemented & what was not implemented with the current CR. Cindy B-Qwest stated that was a list of PCATs that need to be addressed & asked to clarify if the requested list would be by products or by PCATs. Bonnie J-Eschelon asked that the list be by products with their associated PCATs identified. Cindy B-Qwest stated that she would do her best to compile the list. Bonnie J-Eschelon stated that she noticed that quite a few, such as commingling & shared distribution, are not to be on the list that Susan L read. Cindy B-Qwest stated that is why she asked if the list being requested was to be by prod. Bonnie J-Eschelon stated that she sees 3 buckets: done with PCATs, left to do with PCATs, & those currently in some type of legal arena. Cindy B-Qwest stated she sees 4 lists: the original CR list of what has been implemented, what has not yet been implemented, then what was not addressed on the current CR, & those held for some legal forum. Bonnie J-Eschelon asked if those items that are held for some legal forum are items that could also reside on the list of what has not yet been implemented & on the list of what has not been addressed via the original CR. Cindy B-Qwest stated that they could & stated that she would leave that up to CLEC input. Cindy stated that is due to the fact that she is not involved in all that is being challenged, as the CLECs are. Cindy noted that the CLECs would need to help identify those. Bonnie J-Eschelon stated that we needed to get our arms around that before we can proceed with the discussions. Bonnie stated that we need the grouping before we can proceed. Cindy B-Qwest stated that she was fine with that & that she would deliver the list in the next few days. Cindy then asked when we would then meet. Bonnie J-Eschelon suggested that we have our next call about 3 days after Qwest provides the list. Peggy ER-Qwest stated that the CMP Process does call for at least 5 business days advanced notice for a call & would base the next call on that as well. Susan L-Qwest stated that Qwest would get the list out & that CLECs could provide suggested groupings back to the cmpcr mailbox, Qwest would compile the list, then schedule the next meeting for further discussion. Cindy B. noted that she would be available after 12-6.

11-15-06 Prod Proc CMP Mtg: Mark C-Qwest stated that this CR had been in deferred status & is now in CLEC Test status. (Comment from Eschelon - Mark C-Qwest stated that this CR had been in deferred status & Qwest is now bringing this in CLEC Test status.) Cindy B-Qwest stated that the FCC issued & released The Report, Order on Remand, & Further Notice of Proposed Rulemaking (FCC 03-36), referred to as the Triennial Review Order (TRO) effective 10-2-2003 & the Remand Order (CC 01-338) referred to as the Triennial Review Remand Order (TRRO) effective 3-11-2005. Subsequently, Qwest issued CR PC102704-1ES. At that time, Qwest provided notification only on items that were clearly not challenged in the TRO order. CLECs have signed the TRO TRRO amendments to their ICAs & are operating under processes associated with that amendment. Qwest would now like to move forward & release the post TRRO documentation through CMP. TRRO issues that are being addressed by Qwest & CLECs in arbitration of their ICAs or items being challenged by law will not immediately be processed through CMP. Cindy stated that Qwest would like to re-open this CR & would also like to issue subsequent CRs for this effort. (Comments from Eschelon: Cindy B-Qwest stated that the FCC issued & released The Report, Order on Remand, & Further Notice of Proposed Rulemaking (FCC 03-36), referred to as the Triennial Review Order (TRO) effective 10-2-2003 & the Remand Order (CC 01-338) referred to as the Triennial Review Remand Order (TRRO) effective 3-11-2005. Subsequently, Qwest issued Change Request PC102704-1ES. Cindy said, at that time, Qwest provided notification only on items that were clearly not challenged in the TRO order. She said CLECs have signed the TRO TRRO amendments to their ICAs and are operating under processes associated with that amendment. She said Qwest would now like to move forward & release the post TRRO documentation through CMP. Cindy said Qwest is asking to release the undisputed items, those not in arbitration or items being challenged under law. Disputed items will not immediately be processed through CMP. Cindy stated that Qwest would like to re-open this CR & would also like to issue subsequent CRs for this effort.) Bonnie J-Eschelon asked to clarify that Qwest wants to add, in CMP, those not in arbitration or are not being challenged under law. Bonnie asked what Qwest was doing. (Comment from Eschelon: Bonnie J-Eschelon asked Qwest to explain & indicate what products Qwest wants to add in CMP. Cindy B-Qwest stated that Qwest would like to move the current CR, for UNE-P and UBL products, to CLEC Test. The other products would then be addressed via different CRs.) Cindy B-Qwest stated that Qwest would like to move the current CR, for UNE-P and UBL products, to CLEC Test. The other products would then be addressed via different CRs. Bonnie J-Eschelon stated that on the 6-30-2005 call, Qwest said that this would be deferred until Qwest filed SGATS, with CLEC input. Bonnie asked if that was still the plan. [Comment from Eschelon: Bonnie J-Eschelon stated that, on the 6-30-2005 call, CLECs said they wanted to negotiate these terms in ICA negotiations, and Qwest said that, when it filed SGATS, CLECs would at least get an opportunity to have input. Bonnie asked if that was still the plan.) Cindy B-Qwest stated that Qwest is not planning to file SGATS in any state in the near future. Cindy noted that one & a half years ago, we were planning to & that was the intent at that time. Cindy then stated that Qwest is not planning to file SGATS in any state in the near future & would like to move forward based on the CMP process. (Comment from Eschelon: Cindy B-Qwest stated that Qwest is not planning to file SGATS in any state, and that is a change. Cindy noted that was a good point. She said, one & a half years ago, we were planning to & that was the intent at that time. Cindy then stated that Qwest is not planning to file SGATS and would like to move forward based on the CMP process.) Bonnie J-Eschelon stated that there were TRRO PCATs changed outside of CMP & asked how that would work when the TRRO PCATs would be changed without CLEC input. (Comment from Eschelon: Bonnie J-Eschelon stated that TRRO PCATs were changed outside of CMP without CLEC input & asked how that would work.)

Cindy B-Qwest the intent was to cover all issues under this CR. Other products, not contested, such as OCN, UPS; those that can no longer be ordered, the PCATs were moved to a separate place on the web site for those who have signed amendments & for other CLECs to look at. Cindy then stated that Qwest wants to add the PCATs that are not currently under arbitration or under a legal status (i.e. wire center lists) or where states need to finish to resolution. Cindy stated that Qwest wants to propose how to add and post those PCATs, with CLEC input. Cindy then noted that Qwest would like to move forward & make discussions public in an open forum. Cindy proposed that questions & discussion on the structure take place on the first meeting that is currently scheduled for 11-27. (Comment from Eschelon: Cindy B-Qwest said the intent was to cover all issues under this CR. Other products, not contested, such as OCN, UPS; those that can no longer be ordered, the PCATs were moved to a separate place on the web site to cover those who have signed amendments & for other CLECs to look at if you want to see them before you sign an amendment. Cindy then stated that Qwest wants to readdress the PCATs that CLECs did not have input on & that are not currently under arbitration or under a legal status (i.e.wire center lists) or where states need to finish to resolution. Cindy stated that Qwest wants to propose how to add and post those PCATs, with CLEC input. Cindy said Qwest would like to address similarly situated products in chunks for all products with the same flavor. Cindy then noted that Qwest would like to move forward & make discussions public in an open forum. Cindy proposed that questions and discussion on the structure take place on the first meeting that is currently scheduled for 11-27) Bonnie J-Eschelon asked if the statement regarding legal proceedings for wire centers included the Qwest/Eschelon arbitration. (Comment from Eschelon: Bonnie J-Eschelon asked if the statement regarding legal challenges included the Qwest/Eschelon arbitration.) Cindy B-Qwest said yes. Bonnie J-Eschelon said okay. Cindy B-Qwest stated that she proposes that this current CR be moved to CLEC Test & to have the 11-27 ad hoc call in order to start discussions. There were no questions or comments. Mark C-Qwest asked to clarify that the current CR would not be changed or updated. Cindy B-Qwest said that was correct. Mark C-Qwest then asked if the new items would be addressed via new CRs. Cindy B-Qwest said yes. Mark C-Qwest asked if there were any questions or comments. Mark N-Qwest stated that at this time Qwest would like the current CR to reflect CLEC Test in order to maintain continuity going forward. Once the new CRs are discussed & there is more comfort around this effort, the closing of this current CR can be addressed. (Comment from Eschelon: Mark N-Qwest stated that at this time Qwest would like the current CR to reflect CLEC Test in order to maintain continuity going forward. Once the new CRs are discussed & there is more comfort around this effort, Qwest will request closure of the existing CR.) Mark C-Qwest stated that this CR would reflect a CLEC Test status & that Qwest would move forward with the recommended call on 11-27. Bonnie J-Eschelon asked if Cindy B-Qwest had any idea as to what was not included in the legal proceedings at this time. Cindy B-Qwest stated that she is unable to provide a comprehensive list & provided examples of OCN, UBL, & Unbundled Packet Switching. Cindy also noted that Line Sharing may not yet be posted. Bonnie J-Eschelon thanked Cindy B-Qwest for the information. (Comment from Eschelon: Bonnie J-Eschelon thanked Cindy B-Qwest for that information.) There were no additional questions or comments. This CR is in CLEC Test status.

1-18-06 Prod Proc CMP Mtg: Jill M-Qwest stated that this is the CR for the TRO work & because there has been no change in the status, for several months, she would like to put the CR in a Deferred Status. Jill stated that when it is time for the PCAT updates, this CR would move out of Deferred. There was no dissent to moving this CR to Deferred. Kim I-Eschelon stated that there was a notice out today for TRRO and asked if that was separate

from this effort. Jill M-Qwest stated that it was separate & that it was a non-CMP Notice. (1/27/06 - Comment from Eschelon: Jill Martain-Qwest stated that the TRRO notices sent today was for CLECs that had signed the TRRO Amendment.

12-14-05 Prod Proc CMP Mtg: Jill M-Qwest stated that this is still unchanged & that Qwest is still waiting for the SGATs, as previously discussed. This CR remains in Dev Status.

11-16-05 Prod Proc CMP Mtg: Jill M-Qwest stated that there is no change from the previous month. This CR remains in dev.

10-19-05 Prod Proc CMP Mtg: Jill M-Qwest stated that there is no new status for this CR. Liz B-Covad noted that the CLECs do now have access to the secret PCATs.

9-21-05 Prod Proc CMP Mtg: Jill M-Qwest stated that there was no change on this CR & that we are still in a hold mode Liz B-Covad stated that she had a question on a Process Notification on the TRRO Product and Service Log On Jill M-Qwest said that she believed that notice was a Non CMP Notice. Liz B-Covad said that they feel the General Notice should have been a CMP Notice because it was the result of a CR. She said that it did not come out in a notice fashion with & effective date of 10/3. Liz said that she can't comprehend how Qwest can determine that you can only look at a PCAT when an amendment is signed. Liz said that she was confused because she thought it was a process change that Qwest was trying to implement. Liz said that the TRRO does not allow Qwest to restrict the ability to send in orders. Liz said that she would like to formally object to the process Qwest is trying to implement. Jill M-Qwest stated that she would like to take this discussion offline with Covad. Jill said that this stemmed from a Product/Process CR where we agreed in an adhoc meeting, held on 6-30-2005 (see PC102704-1ES for meeting minutes) that the TRRO PCATs would be provided separately. She also said that Qwest & the CLECs agreed Qwest would not update the CMP controlled PCAT documents until the SGATs were approved. Liz B-Covad said that restricting access gives the appearance of preferential treatment. Jill M-Qwest stated that she would like to get the appropriate people together & discuss offline. Bonnie J-Eschelon said that they would like to be included in the discussions. Liz B-Covad stated that it is inappropriate to restrict access to PCATs and that they have a concern with the effective date. Sue W-XO Communications stated that they have a concern as well. She said that they are concerned that Qwest would be implementing differences in process based on the CLEC. Nancy S-Comcast said that they are concerned too. Julie P-TDS Metrocom is concerned. Liz B-Covad stated that the PCATs are not binding and that an adhoc meeting is needed to discuss these concerns. Jill M-Qwest stated that we have noted these concerns & will get back with the CLECs. Liz B-Covad asked if she should escalate via the CMP Process. Jill M-Qwest said no and that we have their concerns noted.

8-17-05 Prod Proc CMP Mtg: Jill M-Qwest stated that there is no change to the status and remains in Development.

7-20-05 Prod Proc CMP Mtg: Jill M-Qwest stated that an adhoc meeting was held to communicate the proposal on how we will move forward and that we will continue down that path. Jill said that this CR will remain in Development.

6-30-05 Ad Hoc Mtg: Rosalin Davis-MCI, Chad Warner-MCI, Chris Terrell-AT&T, Greg Diamond-Covad, Tom Hyde-Cbeyond, Jeff Sonnier-Sprint,

Bonnie Johnson-Eschelon, Doug Henney-Eschelon, Liz Balvin-Covad, Kim Isaacs-Eschelon. DISCUSSION: Cindy B-Qwest said that Qwest suggested this Ad-Hoc mtg to help communicate our implementation plans for the TRO TRRO. She said that many of the CLECs are interested in the implementation of the rules laid out in the orders and may have questions. Cindy said the CLECs likely agree that these orders cover numerous products & processes, not to mention availability & even eligibility. Cindy said that Qwest is developing template language that encompasses our obligations under the TRO/TRRO & that we will be filing that template language with the states in the months to come. She said that the normal filing process will be followed likely allowing a comment period from interested parties. Cindy said that in the meantime, our negotiations team will negotiate the amendment or full template with interested CLECs. Cindy said that negotiation combined with State approval of our template language that is necessary to finalize applicable language &/or processes. Cindy said that in order to most effectively & efficiently work through that process, we believe that it is best to further delay announcements of process or product changes related to these orders via CMP until such time as the language is finalized & will impact all CLECs. She said that no TRO TRRO changes to products or processes will be made across the board until such language is final. Cindy said, as mentioned earlier, we will implement product & process changes only as you sign the amendment or template language, through the change of law provisions that are outlined in your individual contracts. She said that the CLECs, at that time, will be provided with individual PCATs & Business Procedures that are in alignment with their current language so that they can determine any changes to the way you do business with Qwest. Tom H-Cbeyond stated that this plan sounds logical and asked when Qwest could share a draft or final version of the language to review before negotiating. Cindy B-Qwest said that Candice M-Qwest is closer to the filings & this Qwest effort. Candice M-Qwest stated that with the SGAT, there are no filings scheduled yet & with the number of changes, getting language is quite a task. Candice said that there is a negotiations template & a TRO Remand Compliance template on the Qwest Wholesale Web at www.Qwest.com/wholesale/clecs/amendments.html. Candice said that when the CLECs want to begin negotiations, they can contact the Qwest negotiations team. Tom H-Cbeyond said that they would like to review & schedule negotiations. Candice Mowers-Qwest said that this was a good idea & to wait until the last minute will be a push. Tom H-Cbeyond stated that he would download & review the information. The following question was raised in the meeting: What does this have to do with QPP? Cindy B-Qwest said that this has nothing to do with QPP. She said that the QPP Commercial Agreements are on the same website & will remain there. Liz B-Covad summarized that the purpose of this meeting was to relay information on the TRO negotiations, the templates are out there for review & that the PCATs won't be updated until the final language is approved. Cindy B-Qwest stated that we did not want to make process changes that will impact a lot of you & that we will honor your contracts. She said we will share documents as process changes are made. The following question was asked in the meeting: Does this have anything to do with PC102704-1ES. Cindy B-Qwest said that this CR was opened as a way to communicate changes in the TRO/TRRO. She said that there are more changes coming & the CR is the means to share those changes. Cindy said that the CR was initially issued when the TRO came out and had changes. She said that we had to pull back some of the PCATs but will keep the CR open until we can finish CR. Tom H-Cbeyond said that he understood the format and information can be used on the website. Cindy B-Qwest stated that the next steps depend on where each Company is. She said that they can go to the web, study and start negotiations. Cindy said that if you don't want involvement, they could do nothing. She said that as SGAT language changes, we will have a comment period & that the States will engage you when decisions are made. Cindy also said that PCAT

changes will be brought through CMP. There were no additional questions or comments.

6-15-05 Prod Proc CMP Mtg: Jill M-Qwest stated that an ad hoc meeting had been scheduled for 6-22 for discussion of Qwest's direction as a result of the order & to discuss how Qwest would like to move forward. Bonnie J-Eschelon stated that she needs to know who to invite to this meeting & asked for further explanation of the discussion intent. Bonnie then noted that this meeting conflicts with Eschelon's schedule. Bonnie then asked who the Qwest participants would be & asked if there was an agenda. Jill M-Qwest stated that the Qwest participants would be Product Managers & stated that the meeting is to discuss how Qwest CMP would like to move forward with the CMP CRs. Bonnie J-Eschelon asked whom the CLECs should invite to participate & asked if they should include systems people or regulatory people. Jill M-Qwest stated that the discussion should not need systems type people & stated that in regard to regulatory participants; she did not know. Qwest wants to discuss how Qwest would like to move forward from a CMP perspective. Bonnie J-Eschelon stated that it might be a good idea that those involved in TRO or with the change of law participate. Jill M-Qwest stated that the meeting was not regarding the interpretation of the rules; rather how Qwest would like to move forward with the implementation of the process as it related to CMP Liz B-Covad stated that she is also on vacation on 6-22 and could have a back-up at the meeting. Jill M-Qwest stated that the meeting could be rescheduled. Bonnie J-Eschelon stated that 6-27 would work for Eschelon & noted that Tuesday's & Wednesday's were not good for Eschelon. Jill M-Qwest asked if 6-30 would work. Bonnie J-Eschelon stated yes. Liz B-Covad also said yes. Jill M-Qwest stated that Qwest would see if the meeting could be rescheduled for 6-30 and stated that if it could not, Qwest would look at other meeting options. There were no additional comments or questions.

5-18-05 Prod Proc CMP Mtg: Peggy ER-Qwest stated that this was effective on March 18th for some products & was moved back to development for the implementation of the remaining products. Peggy stated that she was not aware of a date yet. Peggy then noted that the CR would remain in Development status. Liz B-Covad stated that the actual amendment notice is now available and so is the appendix A sheet. Jill M-Qwest stated that we would check with Cindy B-Qwest offline.

4-20-05 ProdProc CMP Mtg: Peggy ER-Qwest stated that this CR is in CLEC Test due to the effective date of 3-18 for the first set of products & stated that Qwest would like to move the CR back to Development status for the implementation of the remaining products. Liz B-Covad asked if there was a timeline for the changes in law provisions. Jill M-Qwest stated that there are no dates yet. There was no dissent to the CR moving back to Development status.

3-16-05 Prod Proc CMP Mtg: Cindy B-Qwest stated that this CR will be effective on March 18th and that she would like to move the CR to CLEC Test on the 18th. Jill M-Qwest stated that she was okay moving this CR to CLEC Test on the 18th, but then would like it moved back to Development status for the rest of the piece. Bonnie J-Eschelon stated that she was okay with this moving to CLEC Test on the 18th, for those that are effective on the 18th. [Comment from Eschelon: but does not think it is appropriate to do so before 3/18.] Cindy B-Qwest agreed. Jill M-Qwest stated that this CR would move to CLEC Test on 3-18, then when the other notices go out for the rest of the CR, the status would change to Development.

2-16-05 Prod Proc CMP Mtg: Jill M-Qwest stated that when the final rulings

came out, we received feedback. Jill stated that Qwest would withdraw the PCATs that were affected by the final rules and that Qwest would proceed with UNE-P. Jill stated that Qwest would reissue the PCATs that are being removed from the CR, once it is determined what those changes are & would notify via this same CR. Liz B-Covad asked if Qwest would confirm that Qwest will follow the change of law provisions in their ICA. Comment received from Eschelon 2/24/05 and said she expected a response to her comments. Jill M-Qwest stated that Qwest had received Covads comment & that Qwest would be responding to the comment & all comments that were received. Jill M-Qwest stated that this CR remains in Development status.

1-25-05 Ad Hoc Mtg: Liz Balvin-Covad, Sue Lamb-One Eighty, Elaine Birkquest-Norstar, Sharon Van Meter-AT&T, Becky Quintana-CO PUC, Marty-Rantel, Noreen Carol-Birch Telcom, Chris Terrell-AT&T, Doug Denney-Eschelon, Bonnie Johnson-Eschelon, Tom Hyde-Cbeyond, Rosalin Davis-MCI, Chad Warner-MCI, Cindy Buckmaster-Qwest, Jill Martain-Qwest, Bob Mohr-Qwest, Robyn Libadia-Qwest, Pat Finley-Qwest, Vicki Dryden-Qwest, John Hansen-Qwest, Susan Lorence-Qwest, Jennifer Fischer-Qwest, Pete Budner-Qwest, Chris Quinn Struck-Qwest, Peggy Esquibel Reed-Qwest. DISCUSSION: Peggy ER-Qwest stated that the purpose of the call was for Qwest to review the updates that will be made to PCAT documentation, for this CR. Cindy B-Qwest stated that in the last CMP Meeting, the CR revisions were communicated & that the CR was re-introduced. Cindy stated that Qwest received a lot of opposition in regard to the Regulatory designation. Cindy noted that Qwest agreed to remove the regulatory designation & moved this CR to a non-regulatory category. Cindy also stated that references to the law & regulatory were removed. Cindy noted that law was the reason for the change, but Qwest would now show this CR as non-regulatory. Cindy stated that the changes are based on Qwest not being obligated to provide products added to the CR. Cindy noted that future changes will affect product offerings & that they would be noticed. Cindy stated that the PCATs are identified & the products are included in the CR. Cindy then stated that there would be a simple change at the beginning of the PCATs that will state that this PCAT change details changes to availability of certain Unbundled Network Elements (UNE) products pursuant to the U.S. Court of Appeals for the DC Circuit decision 00-1012 ('USTA II') which vacated some of the FCC's unbundling rules, & the FCC's Interim Rules, which preserved some of the unbundling rules vacated in USTA II. In accordance with these orders & findings, the 'product specified' is/are no longer available to CLECs unless the most current, effective version of CLEC's Interconnection Agreement (ICA) or Amendment includes terms, conditions, & pricing for the products before 6/15/04. Bonnie J-Eschelon asked if they would be sent out for review. Cindy B said yes & stated that Qwest is not changing the availability to those who have via an ICA; & would make available for CLECs who do not have an ICA. Tom H-Cbeyond asked for the timing of giving DS1 wire center information. Cindy B-Qwest stated that there would be no wire center information & stated that Qwest is standing by for further instructions from the FCC. Cindy stated that the order is not yet posted & said that once it is posted, Qwest would then have it go into effect in 30-days. Cindy noted that the process would be followed & that notices would be sent to communicate the changes. Tom H-Cbeyond stated that he had a concern regarding timing, & noted that by 3-14, major changes would be involved & concerned as to how quickly Qwest would get the changes out. Tom stated that all need to make changes & need time to react. Cindy B-Qwest stated that Qwest would not make changes without the proper timeframes in place. Sharon VM-AT&T asked if this information was in the CR. Peggy ER-Qwest stated that this discussion would be in the meeting minutes of this call. Liz B-Covad stated that if Qwest did not want to receive comments, Qwest needs to state clearly in the notices. Jill M-Qwest

stated that the revised & noted Description of Change would also help. Liz B-Covad stated that Qwest needs to provide the intent of the changes & who would be impacted. Jill M-Qwest stated that what Cindy B-Qwest is proposing will be clear in the notices. Liz B-Covad stated that what Cindy B-Qwest related would go a long way & asked to confirm that once the FCC rules are permanent, that Qwest would adhere to the timeframes and go thru the Regulatory process. Jill M-Qwest said that she agreed that if a particular change is a result of the TRO or is a regulatory change, Qwest would follow that process & would provide the appropriate information. Liz B-Covad asked what level of change the PCATs would be. Jill M-Qwest stated that they would be Level 4 Notices. Liz B-Covad stated that she recommends time be provided, due to Cbeyond's concern. Bonnie J-Eschelon said that she had a global comment that she has noticed that the notices do now have additional information included. Bonnie then thanked Qwest for providing that additional information. There were no additional questions or comments. The call was concluded.

1-21-05 Email to Cbeyond: Mr. Hyde, I received your email & will make note of your comments in the CR. As a result of the Oversight meeting that was held with this CR, Qwest is moving forward with the ad hoc call, & if the final rules warrant a change, we will address it at that time. Thank you, Peggy ER Qwest CMP CRPM

1-21-05 Email from Cbeyond: Once again, it is premature to hold any discussion until the permanent FCC rules are issued in the next few weeks. Among other things, the permanent rules allow DS1 loops & EELs in many-if not most-Qwest locations. Any attempt to implement prior to reading the FCC's final order is an exercise in futility & a waste of precious resources.

1-10-05 CMP Ovrsght Mtg. PURPOSE: This was the second meeting of the CMP Oversight Committee to review an issue submitted to the committee on 11/30/04 by Liz Balvin of Covad. The following is the write-up of the discussion. Attendees: Jen Arnold-TDS Metrocom/U S Link, Liz Balvin-Covad, Becky Quintana-Colorado PUC, Bonnie Johnson-Eschelon, Sharon Van Meter-AT&T, Amanda Silva-VCI, Susie Bliss-Qwest, Susan Lorence-Qwest, Bill Campbell-Qwest, Cindy Macy-Qwest, Peggy Esquibel Reed-Qwest, Linda Sanchez-Steinke-Qwest. DISCUSSION: Linda SS-Qwest stated that on Friday Qwest sent an e-mail to Oversight members explaining that we would prefer to revise the CR PC102704-1ES. By revising the CR the historical information is preserved & the references to law would be removed & the title would be changed. Attached to the e-mail was a redlined CR with the proposed changes. The proposed deletions would become the revised title & the revised description of change keeping the original title & the original description of change within the CR. The Oversight members stated they had received & reviewed. Liz B-Covad stated she did not think this process would preserve the CR history & recalled from the last meeting the only recommendation was to defer the CR until the final rules were issued. Susie B-Qwest stated Qwest reviewed three options for the CR; defer until final rules, amend the CR or withdraw the CR & issue a new CR. Liz B. asked if Qwest was going to consider deferring until the rules are permanent. Susie B. said that the approach was considered & voiced concern that the products are currently not available & current contracts are expiring. Bonnie J-Eschelon stated there are products in the PCAT that cannot be ordered because they are not in the CLEC's contract. Bonnie said she was trying to understand why the CR is needed. Bill C-Qwest explained that the PCATs are based on the approved SGATs & the SGATs can be different from the ICA. We try to time the CMP update changes with the SGAT changes & Qwest did put together SGAT changes. However, the SGAT's have been pulled back with concurrence of the states due to the unsettled regulatory situation post

USTA II, post interim order & pre final FCC order. Qwest has changed the ICA language template (insert comment) but the current SGAT's do not accurately reflect the prods Qwest offers & Qwest (end comment) feels it is important to notify CLECs on the changes to the prods. Liz B countered that if the legal implications were removed, the situation is in flux, the permanent rules will be issued later this month & the CLECs are restricted from ordering existing products that are not included in their ICA. Bill C. responded after 6/15/04 CLECs without the ICA including the products do not have the option of ordering the prods. Qwest is choosing to move forward with the CR because the final FCC rules although scheduled to be finalized in January and effective in March, it would most likely be June before changes to the order are made. Liz B. felt that the process was backward because if a CLEC wants these products they would work with the negotiation team and would not go through CMP (insert comment) because CMP specifically call out ICA's override (end comment). Bill C. discussed that Qwest has an obligation to notice the change in the PCAT when the SGAT has not changed. Bonnie J. said that product availability is based on the ICA and even though Qwest notices about product availability, CLEC's can't get the products without an agreement including the product. Bill C. explained that new CLECs may go to the Qwest website to find which products are available & then would be given a contract that does not list all the products that were available on the website. Normally the SGAT change would force the change in the PCAT. Liz Balvin stated that Qwest restricting products to CLECs who don't have them in their ICA is different than limiting the product availability. The intent of the CR was drawn from legal rules & the permanent rules could change the offering. Bill C responded that the CR would have to be changed. Bonnie J asked if traditionally a new CLEC would go to the SGAT or PCAT to see what is available & they are not in sync. Bill C. explained that the PCAT & SGAT are in sync but they are not in sync with Qwest policy. The states are not accepting SGAT changes at this time & the SGAT & PCAT are in sync but the ICA template is different. Becky Q-COPUC asked if Qwest was considering filing the SGAT prior to the final rules or waiting & Bill C. stated that Qwest is waiting, although we did file prior to the USTA decision, but withdrew the filings when it was clear that the states did not believe the timing was right to make the proposed changes knowing full well any state proceedings would have to be revisited. Becky Q voiced concerned that the SGAT on file & the Wholesale tariff are not the current Qwest offering. Liz B & Bill C agreed that the CR was issued as a result of law. Liz was concerned that Qwest would be restricting CLECs from gaining the product going forward but it is available for CLECs with an ICA. Liz B stated that she continues to see the only option is deferring to keep the history of the CR & that not all the history is maintained about the Escalation & Oversight review. Susie B said at the last meeting the committee was polled on the options. Liz B and Bill C discussed whether the CR is limiting products (as called for in the CMP document), restricting new CLECs from getting these products & if a CLECs contract expires then they would be restricted from the product availability. Liz B stated that the CR should identify the interim rules as the basis for notifying the CLECs of 6/15 product changes & that Qwest is not going to file the SGAT until the permanent rules are available. Bill C agreed that the CR is based on the USTA II rules & that Qwest has restricted the products & changes will have to be made to comply with the final rules. Liz B stated the basis is USTA II & Bill C said he agreed that the basis is USTA II, & under the FCC guidance, are no longer required to provide unbundled elements. Liz B said Qwest's current position needs to be identified in the CR. Bill C said that AT&T & Eschelon have a different opinion. Bonnie J said AT&T & Eschelon agree this is not a Regulatory CR & restated Liz's concern if it was appropriate to issue the CR at all if the guidelines are not followed. We agreed the CR is not regulatory because Qwest was not ordered, Qwest made the choice not to offer the products. Bill C asked Liz if we include the language & make it a regulatory CR. Liz B

said that the genesis of the change was the USTA II decision & now Qwest wants to remove that. Bill C stated that during the last meeting it was clear this was not a Regulatory CR. USTA II was a court opinion about what needed to be offered. Bonnie J said that is what takes it out of Regulatory CR classification. Liz B argued that the rules are 'as is' until the permanent rules come out & since it is just an opinion & believes Qwest should follow the SGATs until the rules are permanent. Bill C stated that the DC court vacated the FCC rules & in a sense undermined them & took away the unbundled rules. The FCC said here is the interim rules & will freeze prior to 6/15 until we can put out the final rules. Qwest doesn't want to put the CR in deferred status. Bonnie J said Eschelon does not have an objection to Qwest updating the existing CR (insert comment) because Eschelon has updated CRs without the clock starting over. Becky Q questioned whether the CLECs were arguing the merits of the CR rather than the process that Qwest used. Liz B said the CR could be updated & requested information relating to Oversight & Escalation be included. Linda SS stated that Qwest has not included Escalation response or Oversight minutes in other CRs as the Escalation & Oversight minutes are found in another location on the web site. There was agreement that the CR would provide the revised title, original title, revised description of change, original description of change & url links to the Escalation & Oversight web locations. CR PC120803-1 was provided as an example of a CR that has been revised. Bonnie stated that the history is captured & that this CR is an anomaly because it had the regulatory issue & was not just a systems to process crossover, but does not agree with the CR & does not understand what Qwest is trying to accomplish & Qwest feels the need to move forward. Sharon VM stated that AT&T does not think this is a regulatory CR & would like the CR to include the history of what has been discussed. Deferring the CR would be better & revising is acceptable if the history is included. Liz B agreed deferring would be better & revising the CR sets a precedent that the CR is regulatory but not identifying in that way. There was recommendation from Covad, Eschelon, AT&T, TDS/MetroCom & MCI that the CR be deferred until permanent rules are issued. Becky Q stated that without making any statement on the merits of the CR, she believed that Qwest should go ahead with the CR because she agreed with Bill Cs estimated timeline for permanent rules. Qwest would like to move forward by revising the CR. The Oversight Recommendation will include the different recommendations from the Oversight members. Bonnie J & Becky Q discussed the merit of language changes to the CMP process. Liz B & Bonnie J stated that the CR should not have defaulted to CMP as it was not the appropriate approach & the importance of keeping the CMP guidelines in tact. The meeting was concluded.

1-4-05 CMP Ovrsght Mtg. PURPOSE: This was a meeting of the CMP Oversight Committee to review an issue submitted to the committee on 11/30/04 by Liz B-of Covad. The following is the write-up of the discussion. Attendees: Jen Arnold-TDS Metrocom/U S Link, Liz Balvin-Covad, Becky Quintana-Colorado PUC, Bonnie Johnson-Eschelon, Kim Isaacs-Eschelon, Sharon Van Meter-AT&T, Kathy Stichter-Eschelon, Doug Denny-Eschelon, Amanda Silva-VCI, Jeff Sonnier-Sprint, Susie Bliss-Qwest, Susan Lorence-Qwest, Cindy Buckmaster-Qwest, Bill Campbell-Qwest, Cindy Macy-Qwest, Jill Martain-Qwest, Linda Sanchez Steinke-Qwest DISCUSSION: The meeting began with Qwest making introductions. Linda S-S-Qwest reviewed the issue Covad submitted to Oversight on 11/30/04. Linda read from the Description of the Issue; Qwest inappropriate use of CMP to drive legal interpretation of the Law, & the desired resolution; the proposed changes (PC102704-1ES) be withdrawn until Qwest can properly follow the CMP governing document. Qwest responded on 12/10/04 requesting that Oversight meet to discuss how to move forward with the CR. Liz B reviewed the history of the issue & stated Covad's position that the biggest issue is Qwest is out of scope of CMP. She stated that the first problem is

that the Systems CR SCR102704-1RG was identified as Regulatory & did not follow the process of referencing the page & paragraph & called into question the law or mandate. The second problem is that six CLECs objected to the regulatory classification of the CR & the objections should have been addressed. The CR was then converted to Prod Proc, the regulatory classification removed, & Qwest did not follow the crossover guidelines. Qwest's binding response to the Covad escalation continued to assert that Prod Proc is not the correct category & it is a regulatory CR. Qwest has been out of scope of CMP for this CR. [Comment received from Covad: Qwest's binding response to the Covad escalation continued to base decision on USTA II & FCC interim rules but not call regulatory. Qwest has been out of scope of CMP for this CR.] Susie B-Qwest stated Qwest's position was when objections to the regulatory classification were received, the regulatory definition in CMP did not fit. There was not unanimous agreement that the CR was regulatory. Section 5.1.1 states that if there is not unanimous agreement then the CR will be treated as non-regulatory. PCAT changes need to be made & when PCAT changes are made, Qwest is obligated to notify the CLECs by following 5.4.5 limiting the product availability. Qwest proceeded as a Prod Proc Level 4 change. Liz B & Susie B discussed the concern that CLECs were not given a chance to discuss the CR & whether Qwest was limiting or restricting availability of products. [Comment received from Covad: Liz B stated that CLECs were not given the opportunity to iron out whether the CR should have been categorized as regulatory. Susie B indicated that Qwest has the right to limit the availability of products based on the CMP document. Liz Balvin stated that Qwest is not limiting, but restricting products that other carriers continue to be able to purchase.] Bonnie J-Eschelon stated that Qwest can not make a decision as a company & not allow the customer to order the product any longer. It is required to provide the basis under which the product is removed. Bill C-Qwest, Liz B, Bonnie J, & Susie B discussed resolving the issue by providing the USTA II document & identifying for each product the page & paragraph reference. Liz B & Bonnie J were concerned that CMP process has not been followed, & stated the CR is lacking the steps required. Susie B asked if citing the paragraph would resolve. Liz recalled that the CMP document was written to address regulatory CRs & that Qwest tried to remove the regulatory classification & page & paragraph of law should be provided to move forward with the change. Cindy B-Qwest restated Liz's position; Covad does not want the Regulatory classification removed, but instead would like Qwest to add the page & paragraph. [Comment received from Covad: Cindy B-Qwest asked to restate Liz's (Covad's) position; does Covad want the Regulatory classification removed or Qwest to cite add the page & paragraph. Liz's stated that Qwest continues to call into question the law but not want to cite page & paragraph, there is a difference.] Further discussion ensued between Liz B & Cindy B whether appropriate to revise the CR or leave the CR as is currently. Susan L-Qwest added that when grandparenting products, the CRs remove the product availability. Liz B felt that Qwest has called into question the law & has jerry rigged the CMP process to meet Qwest's needs because there are system edits in place to restrict ordering the products. [Comment received from Covad: products & that the notifications, even level 4 notices carry the clause that IA supercede PCAT documents.] Becky Q-COPUC asked if Liz's issue was there is not a way the CR can be categorized as a regulatory CR. Liz Balvin responded that Qwest has called into question the law & should follow the CMP guidelines & provide page & paragraph. Becky Q stated that if Qwest withdraws the CR & then re-submits the CR as regulatory it is not clear how the CLECs could object. Sharon VM-AT&T stated AT&T had objected to the regulatory classification & read the AT&T attorney position. Cindy B. interjected that this is the very objection that resulted in Qwest removing Regulatory classification from the CR. A number of CLECs objected on this basis & that is where Qwest took its action from. Liz indicated that may have been

some CLEC prematurely showing part of their hand but she didn't see these remarks nor a response from Qwest on these remarks & therefore didn't know Qwest had this information. Bonnie J, Bill C. & Cindy B. discussed that a regulatory classification means Qwest cannot (by law) provide the product & a non-regulatory classification means that Qwest does not have an obligation to & chooses not to provide the product. It was agreed this CR is non-regulatory. Becky Q. added that it is now clear why this is not a regulatory CR. Liz B-Covad stated that had objected to the Systems CR & then escalated the Prod Proc CR. If Qwest had followed the process, the CLECs would have discussed the objections and Qwest's responses to the objections. Qwest is aware of all the other CLEC's positions. [Comment received from Covad: Liz Balvin stated it is easy for Qwest, now that it has all the information in hand, to take this new position. If Qwest had followed the process, the CLECs would have discussed the objections & Qwest's responses to the objections. Qwest is aware of all the other CLEC's positions & by not following the CMP guidelines has eliminated CLECs insight to all that Qwest has.] Cindy B. requested input on how the CR could be moved forward. Liz B. requested that Qwest respond to the objections. There was discussion between Linda S-S, Liz B.& Susie B. concerning Section 5.1.1 related to any requirement that Qwest respond to objections. There was further discussion between Liz B, Susie B, Cindy M & Susan L regarding the CMP voting process, classification of the CR, following CMP guidelines for the CR & the precedent that has been set with change to disposition requests. Liz felt these were different situations. [Comment received from Covad: Liz stated these situations were different because no one has requested a change in disposition.]Becky Q. asked if the concern was that Qwest did not follow the process outlined in 5.1.1 or if the concern would be the same if 5.1.1 were followed. Liz B said she couldn't say for sure because Qwest has all the ammunition & we have none. Bonnie J & Becky Q discussed Qwest exercising their rights to limit product availability, basis for product limitation as it relates to PCAT comments, limiting of products prematurely, & appropriateness of legal discussion on Prod Proc changes. [Comment received from Eschelon: Bonnie J & Becky Q discussed Qwest exercising their rights to limit product availability, basis for product limitation as it relates to PCAT comments, Bonnie said Qwest is limiting products prematurely & Becky agreed. Becky & Bonnie discussed the appropriateness of legal discussion on Prod Proc changes.]Susan L. & Liz B. discussed processing grandparenting change requests, the tariff reference being out of CMP scope & whether the products are currently ordered by CLECs. Liz felt this CR is different because Qwest is citing the law. [Comment received from Eschelon: and on grandparenting CRs no CLECs order the products.][Comment received from Covad: Liz stated that whenever Qwest grandfather's a product, the first question from CLECs is whether anyone is ordering the products.]Cindy B. responded that Qwest has the right to not have to offer products based on the law. Kim I-Eschelon said that the title of the CR, USTA II, implies that the change is based on the law. Cindy B. said that she was not involved when the CR was initiated or when it was decided it was a regulatory CR. The change is not a mandate & Qwest is obligated to notify CLECs of the change. There has been no effort to jerry rig CMP. Qwest is notifying CLECs the products will not be available on a going forward basis. Liz B & Becky Q discussed if notification should be through CMP & PCAT changes. Bill C said a note in the PCAT stating if the CLEC does not have these products in the current ICA then these products are not available. Bill C, Liz B & Cindy B continued discussing options to process the CR, ability to vote down a regulatory CR & then move it to prod proc. Re-issuing the CR & starting the clock over based on conversation & intent, changing the title & editing the CR, & posting of historical information to the CR. Bonnie J asked that the meeting minutes reflect all of the conversation that has taken place. [Comment received from Eschelon: Bonnie said Qwest often reflects their views but

not CLECs.]Liz B, Sharon VM, Susie B & Becky Q presented options to process the CR; changing it to a regulatory CR because it is citing the law, submitting a new ProdProc non-regulatory CR stating intentions, changing the CR title, deferring, amending the current CR & maintaining the history. Susan L suggested Oversight members take a poll on which would like to modify the existing CR, which would like a new CR .Bill C, Becky Q, Cindy B, Bonnie J, & Liz B discussed options related to the CR. The CR is currently accurate & may change soon. When the final rules are issued DS1 & DS3 loops may not be accurate. [Comment received from Eschelon: When the final rules are issued this will change because DS1& DS3 loops may not be accurate.] Bill C asked if the CR is moved to deferred status if the CLEC community is willing to waive the notification requirement. Kim I & Bill C discussed SGAT changes, PCAT changes & the ICA negotiations. [Comment received from Eschelon: Bill said that the current negotiation template reflects the correct information but the SGATs have not been updated. Bonnie asked if there was a particular CLEC that was challenging Qwest on this issue & if that is why Qwest needed to update PCATs.]Cindy B, Bonnie J & Liz B continued discussion related to processing the CR, Bonnie J, Bill C & Liz B discussed how CLECs should be notified of the product change & the PCAT reflecting the SGAT, notification through change of law, how contracts override the PCATs, & product availability is negotiated through the ICA agreements. [Comment received from Eschelon: Bonnie said if Qwest will limit product availability in its existing ICA, Qwest would need to notify Eschelon through the change in law provision of its contract and not through a PCAT CMP notice. Bill agreed.]Becky Q suggested that Qwest discuss the CR options internally. The Oversight committee agreed to meet again on 1/10/04 at 3:00 p.m. MT. The meeting was concluded.

1-19-05 Prod Proc CMP Mtg: Jill M-Qwest stated that a meeting was held & that the CR Title was revised. Cindy B-Qwest provided history of the CR & noted that the CR was issued as Regulatory & it limited the availability on certain products. The CR designation changed, in 11-2004, to a Prod Proc CR & that several elements remained on the request. Cindy noted that there was discussion in December & on a 1-5 ad-hoc meeting. Cindy stated that the CR was again revised & noted that there is no law forcing Qwest to make this decision. Cindy stated that this is an opportunity that Qwest is taking advantage of. Cindy noted that the CRs Title & Description were changed to remove references to USTA II. Cindy then reviewed the new Title and Description. Cindy stated that the CR Description states "any future changes of law may impact this notification & will be supported by the applicable notification". Cindy stated that the CR is in Development status & will notify the CLECs, on a going forward basis, the dates that the products cannot be ordered. Cindy then noted that there is an ad-hoc meeting scheduled for 1-25 to review the changes. Linda SS-Qwest stated that Qwest sent a notice on 1-17 and as there was no recommendation from Oversight, the notice included the competing recommendations. Jill M-Qwest asked if there were any questions or comments. Bonnie J-Eschelon stated that she has not yet reviewed the revisions & will reserve comments for the ad-hoc meeting. [1/28/05 Comment from Eschelon: and/or comment cycle.]

12-2005 CMP Mtg: Cindy B-Qwest advised that we have suggested an Oversight Committee meeting be held. Qwest has scheduled the meeting for 12-20 at 1:00 p.m. MT. Liz B-Covad advised that Qwest continues to site law without issuing the CR as Regulatory. Covad believes system edits are in place to not allow CLECs to order products not available. If Qwest sites legal interpretation of law the page & paragraph must be included. Covad is not saying that CMP is or isn't the right forum, but Qwest is trying to make a unilateral decision & we do not know what law Qwest is citing.

Qwest doesn't believe the CLECs need to know what page & paragraph are referenced, as the CMP document states. It was agreed more discussion would take place at the Oversight meeting. This CR will move to Development Status.

11/17/04 CMP Mtg: Cindy B-Qwest stated that this CR has drawn quite a bit of attention. Qwest would like to clarify the intent of the CR. Cindy advised that we are having an ad hoc meeting on Friday, 11-19 to review the documentation & take issues. Qwest apologizes for the confusion as we issued the CR two times. The CR was modified to clarify the scope to include USTA II & FCC Interim Rules. Cindy B. advised that CLECs who have language in their ICA can continue to order these products & CLEC who do not have language in their ICA can not order the products nor amend their ICA to include such language. Cindy listed the products affected. Josh T-TelWest asked what if a CLEC opts into an existing contract? Cindy B-Qwest advised that you are permitted with the exception of the elements cited. David M-TelWest questioned without signing a TRO USTA II agreement a CLEC can opt into a contract? David advised that Qwest Regulatory has said CLECs can not do this. Cindy B-Qwest said that the contract would be modified as it has to be TRO & USTA II compliant. Liz B-Covad advised that we continue to object that Qwest bring (insert comment from Covad/Eschelon) to CMP its legal interpretation. Liz advised that Qwest is using ad hoc meetings to gain insight into the CLECs view of the law and it is inappropriate (end comment). Cindy B-Qwest advised this has nothing to do with Qwest telling our interpretation of the law. This is in CMP to advise about a product that is being limited. Liz B-Covad stated that this is more than a product being discontinued. In addition, Qwest can not cite the law & then not call it a Regulatory CR. There are legal means to negotiate agreements. Cindy B. advised this CR was initially a Regulatory CR & it was opposed. That is why we changed it to a Prod Process CR. We are only telling you that you can't have the product if you don't have it in your contract. Liz B-Covad advised the reason they objected to the Regulatory classification is that Qwest didn't cite the page & paragraph. Qwest is still citing the law, [comment from Covad/Eschelon] not calling it a regulated changed and that is still out of scope for CMP. Liz advised that Qwest should have followed CMP governing document & not simply converted the systems CR to prod proc, that the objections should have been addressed & if agreed to by the community, the CR would have 'crossed over' to prod proc. Qwest is trying to manipulate the CMP process to fit their needs. Liz advised that it is inappropriate for Qwest to host an ad hoc meeting. Without following the CMP governing documentation, Qwest is asserting its legal interpretation, & that is the problem (end comment) This should be handled through arbitration of contracts. Cindy B. restated that if you do not have the products in your contract you can not order them. Qwest does not have an obligation to offer this. David M-TelWest said it is not important to me what Qwest's interpretation is. It should be arbitrated & not unilaterally implemented by Qwest. Cindy B. summarized & clarified the discussion-if Qwest cites the page & paragraph, and why it is the law, & if we come to agreement on the language in the CR, then we can move it forward in CMP. Bonnie J-Eschelon said whether or not we agree on the language, this should not be discussed in CMP. We do not discuss legal interpretation in CMP. This should be done in a different forum. Liz B-Covad stated that this is an ICA negotiation discussion. David M-TelWest stated that he still has a concern with how we are treating CLECs without an existing ICA & that they can not opt into existing ICAs. I think the interpretation is wrong & CLECs should be able to do this. Qwest agreed to cancel the 11-19 ad hoc meeting, review the CR, & provide additional information at a later date. This CR will move to Presented Status. (comment from Eschelon) Cindy B. said like in the words of Arnold Swartzager I'll be back (end comment).



Information Current as of 6/18/2007