



Announcement Date: April 2, 2007
Proposed Effective Date: May 17, 2007
Document Number: PROS.04.02.07.F.04590.Expedites_Escalations_V45
Notification Category: Process Notification
Target Audience: CLECs, Resellers
Subject: CMP - Expedites and Escalations V45
Level of Change: Level 3

Summary of Change:

On April 2, 2007, Qwest will post planned updates to its Wholesale Product Catalog that include revised documentation for Expedites and Escalations V45. These will be posted to the Qwest Wholesale Document Review Site located at <http://www.qwest.com/wholesale/cmp/review.html>.

Qwest is updating the Expedite process to change the existing manual process. The Approved Expedites Requests and the Pre-Approved Expedites will be changed to return a Firm Order Confirmation (FOC) with the new due date instead of calling you. In an effort to improve center efficiencies Qwest will begin sending a FOC to you for the date provided by Network that Qwest can meet in expedite situations whether it is the date requested by you or an alternate date.

Current operational documentation for this product or business procedure is found on the Qwest Wholesale Web Site at this URL: <http://www.qwest.com/wholesale/clecs/exesclover.html>

Comment Cycle:

CLEC customers are encouraged to review these proposed changes and provide comment at any time during the 15-day comment review period. Qwest will have up to 15 days following the close of the comment review to respond to any CLEC comments. This response will be included as part of the final notification. Qwest will not implement the change sooner than 15 days following the final notification.

Qwest provides an electronic means for CLEC customers to comment on proposed changes. The Document Review Web Site provides a list of all documents that are in the review stage, the process for CLECs to use to comment on documents, the submit comment link, and links to current documentation and past review documents. The Document Review Web Site is found at <http://www.qwest.com/wholesale/cmp/review.html>. Fill in all required fields and be sure to reference the Notification Number listed above.

Timeline:

Planned Updates Posted to Document Review Site	Available April 2, 2007
CLEC Comment Cycle on Documentation Begins	Beginning April 3, 2007

CLEC Comment Cycle Ends	5:00 PM, MT April 17, 2007
Qwest Response to CLEC Comments (if applicable)	Available May 2, 2007 http://www.qwest.com/wholesale/cmp/review_archive.html
Proposed Effective Date	May 17, 2007

If you have any questions on this subject, please submit comments through the following link: <http://www.qwest.com/wholesale/cmp/comment.html>.

Sincerely

Qwest Corporation

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

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

If you would like to unsubscribe to mailouts please go to the "Subscribe/Unsubscribe" web site and follow the unsubscribe instructions. The site is located at:

<http://www.qwest.com/wholesale/notices/cnla/maillist.html>

Expedites and Escalations Overview – ~~V44.0~~V45.0

[History Log](#) (Link italicized text to: [Replace Existing Download With Attached History Log](#))

Introduction

Qwest quickly responds to your escalation or expedite requests offering you clear and complete explanations so you can satisfactorily respond to your end-users.

- Expedites are requests for an improved standard interval that is shorter than the interval defined in our [Service Interval Guide \(SIG\)](#) (Link italicized text to: <http://www.qwest.com/wholesale/guides/sig/index.html>) or your interconnection Agreement (ICA), Individual Case Basis (ICB) or committed to ICB (Ready for Service (RFS) + Interval) date.
- Escalations can be initiated for any issue, at anytime, and at any escalation point. Escalations can also be for requests for status or intervention around a missed date.

The following summarizes the processes used within Qwest for all Wholesale Products and Services to handle expedite and escalation requests.

Expedites

Requesting an expedite follows one of two processes, depending on the product being requested. If the request being expedited is for a product contained in the “Pre-Approved Expedites” section below, your ICA must contain language supporting expedited requests with a “per day” expedite rate. If the request being expedited is for a product that is not on the defined list, then the expedited request follows the process defined in the “Expedites Requiring Approval” section below.

Expedites Requiring Approval

For products not listed in the Pre-Approved Expedite section below, (non-designed products such as POTS, Centrex or DSL service) the following expedite process applies. Expedite charges are not applicable with the Expedites Requiring Approval process.

Following is a list of conditions where an expedite is granted:

- Fire
- Flood
- Medical emergency
- National emergency
- Conditions where your end-user is completely out of service (primary line)
- Disconnect in error by Qwest
- Requested service necessary for your end-user's grand opening event delayed for facilities or equipment reasons with a future RFS date
- Delayed orders with a future RFS date that meet any of the above described conditions
- National Security
- Business Classes of Service unable to dial 911 due to previous order activity
- Business Classes of Service where hunting, call forwarding or voice mail features are not working correctly due to previous order activity where the end-users business is being critically affected

For any of the above conditions, expedited request can be made either prior to, or after, submitting your service request.

To request an expedite on a Local Service Request (LSR) you can either:

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- Submit the request with your expedited due date and populate the EXP field. Also include in REMARKS the reason for the expedited request and then call the Qwest Call Center.
- Submit the request with a due date interval from our [SIG \(Link italicized text to: http://www.qwest.com/wholesale/guides/sig/index.html\)](http://www.qwest.com/wholesale/guides/sig/index.html) or your ICA and then call the Qwest Call Center.

In both scenarios, a call to the Qwest Call Center is required on 1-866-434-2555 to process the expedited request.

To request an expedite on service requests issued via an Access Service Request (ASR), you may use either of the options described above for LSRs to submit the ASR. You should then call 1 800-244-1271

You may be asked to provide verification of the expedited reason or situation for any of the expedite reasons listed above. In some cases, you may be asked for the service order number that caused the expedite condition, such as the service order number that caused the hunting or call forwarding expedite. The type of verification required will depend on the specific circumstances of the expedite and will be determined on an Individual Case Basis (ICB).

Once your expedite request is received, your Wholesale representative will review the request based on the previous list of available expedite scenarios to determine if the request is eligible for an expedite. If approved, the next step is to contact our Network organization to determine resource availability.

Depending on the type of service on the account, the following action is taken once the request is determined to be eligible for an expedited due date:

Non-Designed/No Dispatch Required

For requests that do not require a dispatch, the order is issued with the expedited due date.

Non-Designed/Dispatch Required

For requests that require a dispatch, the Network organization is contacted to determine Technician availability. If appointments are available on the requested due date, your expedite is granted. If no appointments are available, then Qwest will offer an alternative date, if one is available, prior to the requested due date. You can expect to receive a response to your expedited request usually within four business hours.

Designed Services

For Designed Services, the Network organization is contacted to determine resource availability for the Central Office and Outside Technicians as well as for the Testers that work with you to accept the service. You can expect to receive a response usually within four business hours.

Approved Expedited Requests

If the expedited request is approved and the original request contained the expedited due date and the EXP field was populated, Qwest will return a Firm Order Confirmation (FOC) acknowledging the agreed to expedited due date. If the expedited or agreed to due date Qwest can meet is different from what was originally submitted on the ASR or LSR and the EXP field is populated, Qwest will return a FOC with the new due date and continue to process the request. contact you and request that you supplement your request with the agreed to expedited date. The EXP field on the supplement ASR or LSR must also be populated. On LSRs, if the expedite is approved and the EXP field is not populated, Qwest will contact you and request that you supplement your ASR or request LSR with the new DDD populating and that you populate the EXP field. If the supplement is not received within four business hours, Qwest will continue to

process the ASR or LSR as if the expedited request was not received and will FOC back the standard interval or the original due date provided on the ASR or LSR if it was longer than the standard interval.

Denied Expedited Requests

If denied, then we will provide you reasons that the request was denied or we will offer an alternative date that we could install the service. If the request is denied, and you still want to continue to have Qwest provision the service request, Qwest will return a FOC with the standard interval or the original due date provided on the FOC if it was longer than the standard interval.

Pre-Approved Expedites

The Pre-Approved expedite process is available in all states except Washington for the products listed below when your ICA contains language for expedites with an associated per day expedite charge.

Note: Resold Designed products are automatically included based on the terms and conditions outlined in the ICA and individual state tariffs, catalogs or price lists.

For products other than the Resold Design products identified below, if your contract does not contain the appropriate expedite language, you will not be able to expedite the request unless the expedite is due to a Qwest caused reason.

The Expedites Requiring Approval section of this procedure does not apply to any of the products listed below (unless you are ordering services in the state of WA).

An expedite charge applies per ASR or LSR for every day that the due date interval is improved, based on the standard interval in the SIG, ICA, or ICB criteria as described above. It is not necessary for you to call into Qwest to have the expedite approved. To expedite a service request on an ASR or LSR you must populate the EXP field and put the desired expedited due date in the DDD field on the ASR or LSR.

Note: If the ASR/LSR you are submitting requests a same day due date, your request must be received before 12 noon MT.

When Qwest receives an ASR or LSR with the EXP populated and the DDD is less than the standard interval, Qwest will determine if the request is eligible for an expedite without a call from you. If the request meets the criteria for the Pre-Approved Expedite process, Qwest will process the request and return a FOC acknowledging the expedited due date. The appropriate expedite charge will be added to your service order.

If the due date Qwest can meet is different from what was originally requested on the ASR or LSR, Qwest will return a FOC with the new due date and continue to process the ASR or LSR. The appropriate expedite charge will be added to your service order. If the due date on the FOC does not meet your needs, you can supplement the request to a due date that is equal to or greater than standard interval as defined in Qwest SIG's, cancelling the expedite.

If the request does not meet the criteria for the Pre-Approved Expedite process, the ASR or LSR will be processed using the standard interval that is defined in the [Standard Interval Guide for Resale, UNE and Interconnection Services](http://www.qwest.com/wholesale/guides/sig/index.html) (Link italicized text to: <http://www.qwest.com/wholesale/guides/sig/index.html>).

Following is a list of the products, which require expedite language in the ICA and may be expedited that will receive the appropriate Expedite Charge:

- UBL
- UBL DID (Unbundled digital trunk)
- UBL DS1 (Unbundled digital trunk facility)
- UNE-C PL (EEL)
- UNE-P ISDN BRI
- UNE-P DSS Facility
- UNE-P DSS Trunk
- UNE-P PRI ISDN Facility
- UNE-P PRI ISDN Trunk
- UNE-P PBX Designed Trunks
- UNE-P PBX DID IN-Only Trunks
- UDIT
- LIS
- CCSAC SS7 Trunk or Facility
- Unbundled Dark Fiber

Following is a list of Resold Designed Products, which do not require an amendment, which may be expedited and will receive the appropriate expedite charge:

- Analog PBX DID
- Private Line (DS0, DS1, DS3 or above)
- ISDN PRI T1
- ISDN PRI Trunk
- ISDN BRI Trunk
- Frame Relay Trunk
- DESIGNED TRUNKS (Includes designed PBX trunks) Trunk
- MDS / MDSI (*IIS Only*)
- DPAs (multiple DPAs or FX, FCO) Trunk

Note: Any requests that are expedited due to a Qwest caused reason, do not incur an expedite charge. Additionally, if the due date of an expedited request is missed due to Qwest reasons, expedite charges do not apply.

If the order becomes a Delayed Order on the due date, Qwest will cooperatively work with you to obtain the best Ready For Service date (RFS) possible and expedite charges do not apply.

If an order becomes delayed for facilities prior to the due date, once Qwest establishes a new RFS it is communicated to you via the FOC. If you do not accept the due date that is established and request to expedite the RFS, expedite charges may apply. Each expedited delayed order request will be reviewed on an ICB to determine if expedite charges apply. If the expedited due date request results in Qwest incurring additional costs to improve the date that was FOC'd, expedite charges apply. Qwest will advise you if expedite charges apply prior to confirming the expedited request to obtain approval from you, or offer an alternate date that Qwest can meet. The expedite charges will be based on the number of days improved from the original RFS date.

If an order was delayed due to a Customer Not Ready (CNR) condition as described in the [Provisioning and Installation Overview](http://www.qwest.com/wholesale/clecs/provisioning.html) ([Link italicized text to: http://www.qwest.com/wholesale/clecs/provisioning.html](http://www.qwest.com/wholesale/clecs/provisioning.html)); and you wish to expedite the newly requested due date, supplement the request with the new Desired Due Date and populate the EXP field of the LSR/ASR. Qwest will review your expedited request for resource availability and return a FOC acknowledging the due date Qwest can meet. ~~In some cases, we may contact you to advise resources for expedite are not available or offer an alternate date.~~ Expedite charges apply and are based on the number of days the CNR standard interval is improved.

Expedites Supporting Non-Qwest caused Restoral Requests

This process includes Restoral Requests on Resale/UNE-P/Retail to Resale or UNE-P Conversions and Transfer of Service when the service orders have completed. This process applies to Resale/UNE-P POTS, Resale/UNE-S and Resale UNE-P Centrex 21 products, including DSL.

You will follow this documented **Expedite** process as outlined when you require an expedite to a standard interval in order to restore an end-user due to a Non-Qwest caused out of service condition. An expedite restoral request is a result of your inability to complete a conversion or outside move service request where you were unable to cancel or change the due date on the service order(s) prior to order completion. Restoral requests may involve you alone, a Qwest Retail account and you, or you and a different CLEC on conversion and outside move (T & F) type service order's. Restoral requests will be accepted for both full and partial restorals.

When an expedite restoral request situation occurs, refer to the following when you prepare your service request:

- Issue the Restoral Request LSR as directed per the Decision Charts and order type scenario's.
 - Populate the RPON field with the PON used on the original LSR if available
 - Populate the EXP field
 - Populate Manual IND = Y
 - The REMARKS field can be populated with the specific reason for the request such as:
 - Restoral request Full, Resale to UNE-P conv, restore original service, Or
 - Restoral request, Partial, Resale to UNE-P conv, restore original service, Or
 - Restoral request, Partial, UNE-P to Resale conv, restore original service, Or
 - Restoral request, Full, Resale or UNE-P T&F, restore F location, etc., Or
 - Restoral Request, Restore original full service back to CLEC XXXX, Or
 - Restoral Request, Restore original partial service back to CLEC XXXX, Or
 - Restoral Request, Restore original F Loc service, full/partial back to old CLEC
 - Restoral Request, Disc service, restore original Retail service, full/partial
- Contact the Customer Service Inquiry and Education (CSIE) Center at 866-434-2555
- Open an Escalation ticket.
-
- Request a Restoral Request for Previous Service.
- Provide LSR ID if appropriate per Decision Chart and order type scenario's.

Benefits

- Expedited intervals for restoral of previous service
- Uniform documented process for restoral requests
- Qwest will negate the one month minimum billing on a disconnect or conversion service order as applicable.

Restrictions

- You must issue appropriate LSRs first (if directed to do so per the Decision Chart below) followed by opening a Call Center escalation ticket. Restoral requests received prior to new LSR issuance will not be accepted, excludes Qwest Retail restorals.
- Standard intervals must be used when submitting LSRs, CSIE will expedite due date appropriately for restoral
- Expedited restoral requests must be requested within 24 hours, extending into the next business day, following the LSR completion date. Restoral requests received after 3 PM will be considered next business day work activity; this includes restoral requests received after 3 PM on Saturday based on the SIG (except for DSL)."
- Service being restored must be the same type of service with same features, same TN's, etc. as was previously provisioned. Full or partial restorals are acceptable.

- Qwest will reuse facilities when the facilities are available for the restoral.
- All applicable recurring and non-recurring charges will apply, based on order completion and physical work that was completed or needs to be completed to restore service. Retail practices will apply when restoring Qwest Retail accounts.
- When a restoral involves two CLECs, it is up to you and the old CLEC to coordinate and agree upon an expedite, prior to opening up the Call Center Escalation ticket(s).
- Expedite charges may apply based upon individual interconnection agreements, state tariffs or SGATS.

The following **Order Type Scenario's** are included in this restoral process:

1. Resale / UNE-P T & F, same CLEC
2. Resale to UNE-P Conversion as is, same CLEC
3. Resale to UNE-P Conversion as specified, same CLEC
4. UNE-P to Resale Conversion as is, same CLEC
5. UNE-P to Resale Conversion as specified, same CLEC
6. Resale / UNE-P Migration to new CLEC with move via single LSR
7. Resale to UNE-P Conversion as is, to a new CLEC
8. Resale to UNE-P Conversion as specified, to a new CLEC
9. UNE-P to Resale Conversion as is, to a new CLEC
10. UNE-P to Resale Conversion as is, to a new CLEC
11. Qwest Retail to Resale / UNE-P Conversion as is
12. Qwest Retail to Resale / UNE-P Conversion as specified
13. Qwest Retail to Resale / UNE-P Conversion with move via single LSR process

Decision Chart, Scenario's 1-5, Same CLEC		
IF	AND	THEN
Conversion, Migration and/or Move Service Order has completed	You want full or partial restoral of previous service	<ul style="list-style-type: none"> • Issue Restoral Request LSR as appropriate based on order scenario and order completion, such as a New Connect, Change or Conversion with or without move, Transfer of Service or Disconnect • Follow expedite procedures

Decision Chart, Scenario's 6-10, To a New CLEC		
IF	AND	THEN
Conversion, Migration and/or Move Service Order has completed	You want full or partial restoral of previous service	<ul style="list-style-type: none"> • Either the end-user, or the new CLEC and the end-user must contact the old CLEC's Customer Contact Center and request that the end-user's service be re-established as previously provisioned for the old CLEC on Resale or UNE-P service • Old CLEC must follow expedite procedures • Old CLEC will issue Restoral Request LSR as appropriate based on order

		<p>scenario and order completion, such as a New Connect, Change or Conversion with or without move</p> <ul style="list-style-type: none"> • New CLEC must follow expedite procedures • New CLEC will issue Disconnect LSR if required based on order scenario and order completion • Old and new CLECs will coordinate their order activity • Contact your Qwest Service Manager if you require assistance with old CLEC contact
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Decision Chart, Scenario's 11-13, Conversion from Qwest Retail to New CLEC		
IF	AND	THEN
<p>Conversion, Migration and/or Move Service Order has Completed</p>	<p>You want full or partial restoral of previous service</p>	<ul style="list-style-type: none"> • Contact the CSIE Center at 866-434-2555 • Open an Escalation ticket • Request a warm transfer to the CSIE Tier 1 support group • Place a verbal Restoral Request for Previous Retail Service, full or partial restoral • CSIE will advise you if a new LSR will need to be issued by you • If a new LSR is needed and is not issued within 2 business hours, the escalation ticket will be closed. If this occurs, the CLEC must start the expedite process again once the LSR has been issued as directed.

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Escalations

Escalations are a request for status or intervention around a missed critical date such as:

- Plant Test Date (PTD)
- Due Date (DD)
- Ready For Service (RFS)

Qwest's Service Centers pro-actively escalate any critical dates in jeopardy and will notify you. If, however, you find it necessary to initiate an escalation, call the assigned Qwest Wholesale Center Representative at one of the numbers listed in the Expedites section for assistance. Regardless of how initiated, by you or internally, Qwest escalation roles and responsibilities can be summarized as:

- Qwest Wholesale Center Representatives
Local Service Request (LSR) or Access Service Request (ASR) escalations related to Rejects/Delayed orders, critical dates and Firm Order Confirmations (FOC).
- Qwest Service Manager
Involved only after normal processes fail to resolve the escalation to your satisfaction. Evaluates the situation based on commitments managing associated resolution activities.
- Qwest Senior Service Manager/Director
Involved only when the Service Manager's efforts are unsuccessful. Provides direction to those working the issue, partnering with Center Coaches and Team leaders.
- Qwest Senior Service Director/Vice President
Contacted for direction and/or assistance for those working the escalation, providing timely status updates back to the prior level and you directly.

Escalations – Maintenance and Repair

At your discretion, you may initiate an escalation of your trouble report through our electronic interface Customer Electronic Maintenance and Repair (CEMR) or by calling either the Wholesale Repair for Unbundled Network Elements (UNEs) and Complex services or the Repair Call Handling Center (RCHC) for Plain Old Telephone Service (POTS) and Non-Complex services. Refer to our [Maintenance and Repair Overview](#) (Link italicized text to: <http://www.qwest.com/wholesale/clecs/maintenance.html>) for additional information.

Escalations – Technical Escalation Process

Additional information about the Technical Escalation Process can be obtained from Qwest's [Operations Support Systems General Information](#). (Link italicized text to: <http://www.qwest.com/wholesale/systems/generalinfo.html>)

Note: Occasionally, your end-user may find their way to the Qwest Wholesale Center or Qwest Service Manager and our Wholesale Center Representatives will explain that you are our customer and direct them to you for assistance.

Should you have questions, or need additional information related to the expedite or escalation processes defined above, contact your [Qwest Service Manager](#) (Link italicized text to: <http://www.qwest.com/wholesale/clecs/accountmanagers.html>) for assistance.

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Training

Local Qwest 101 "Doing Business With Qwest"

This introductory Web-based training is designed to teach the Local CLEC and Local Reseller how to do business with Qwest. It will provide a general overview of products and services, Qwest billing and support systems, processes for submitting service requests, reports, and web resource access information. [Click here to learn more about this course and to register.](#) (Link italicized text to: http://www.qwest.com/wholesale/training/wbt_desc_lq101.html)

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Contacts

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

Expedites and Escalations

- Local Service Requests (LSRs)

Wholesale Center			
Tier	Responsibility	Activity	Contacts
Tier 1	Customer Service Inquiry and Education Center (CSIE)	First point of contact for CLECs	866-434-2555 Monday – Friday 8:00 AM – 6:00 PM Central, Mountain, and Pacific Time Zones Note: Only orders due to complete on a Saturday that require a same day cancellation, due date change or concurrence should call 612-327-0511. All other requests should be made the next business day.
Tier 2	Subject Matter Expert (SME), Team Leaders, Team Coaches	Respond to issues not resolved at Tier 1	800-366-9974 Monday – Friday 8:00 AM – 6:00 PM Central, Mountain, and Pacific Time Zones
Tier 3	Appropriate Qwest Service Manager	Respond to issues not resolved at Tier 2	Service Manager (Link italicized text to: http://www.qwest.com/wholesale/clecs/accounmanagers.html)

A call center ticket is opened on every call into the CSIE Center. Upon resolution of the ticket a close code is assigned to the ticket. Upon request the close code is provided to you. [Should you disagree with the codes used to close the ticket you will use the escalation process.](#)

For a list of the close codes used at the CSIE level see the Call Center Database Ticket Reports section of the [Ordering Overview PCAT](#) (Link italicized text to: <http://www.qwest.com/wholesale/clecs/ordering.html>).

Only orders due to complete this immediate Saturday and require a cancellation or due date change or for concurrence should call 612-327-0511. All other requests should be made the next business day.

- Access Service Requests (ASRs)

	Products & Services	Contacts	Fax
	All	800-244-1271	800-335-5680

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Frequently Asked Questions

This section is currently being compiled based on your feedback.

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| **Last Update:** ~~January 15, 2007~~ [May 17, 2007](#)

META Tags: [Expedites](#); [Escalations](#)

Qwest Response to Document In Review

Response Date: May 2, 2007
Document: Process: Expedites and Escalations V45
Original Notification Date: April 2, 2007
 • **Notification Number:** PROS.04.02.07.F.04590.Expedites_Escalations_V45
 • **Category of Change:** Level 3

Qwest recently posted proposed updates to the Expedites and Escalations V45. CLECs were invited to provide comments to these proposed changes during a Document Review period from April 3, 2007 through April 17, 2007. The information listed below is Qwest’s Response to CLEC comments provided during the review/comment cycle.

Resources:
 Customer Notice Archive <http://www.qwest.com/wholesale/cnla/>
 Document Review Site <http://www.qwest.com/wholesale/cmp/review.html>

If you have any questions on this subject or there are further details required, please contact Qwest’s Change Management Manager at cmpcomm@qwest.com.

Qwest Response to Product/Process Expedites and Escalations V45 Comments

#	Page/Section	CLEC Comment	Qwest Response
1		<p>Eschelon objects to Qwest’s proposed changes to its expedites PCAT. In any event, Eschelon’s interconnection agreement terms control. Eschelon provides the following comments on Qwest’s proposed PCAT changes:</p> <p>1. In Qwest’s red-lined document, the first changes are to the emergency-based “Expedites Requiring Approval” when Qwest approves the expedite (“Approved Expedited Requests”). (Qwest adds the term “Qwest can meet,” which is discussed below.) Next, Qwest proposes to insert “and the EXP field is populated” where it did not appear before and, at the same time, delete the</p>	

	<p>current language under which Qwest contacts CLEC. Qwest proposes to replace that language with language indicating that Qwest will only continue to process the request if the EXP field is populated. Otherwise, Qwest will contact CLEC to supplement the request and populate the EXP field.</p> <p>Will this delay orders that previously would have been expedited based upon a call after the request was submitted (as CLEC may not know at the time of submitting the request that an expedite is needed)?</p> <p>Also, this change raises concerns about the relationship of this change to Qwest's systems business rules. Qwest's proposed language appears to limit the CLEC's ability to obtain emergency-based "Expedites Requiring Approval," to which Eschelon objects. Qwest requires manual handling of many orders, but Qwest's business rules do not appear to allow a CLEC to populate the EXP field when Qwest requires manual handling. Specifically, the LSOG provides the following business rule: "If EXP = 'Y', the MANUAL IND should = 'N'." The red-lined states, regardless of the option used to request the expedite (e.g. Submit the request with your expedited due date and populate the EXP field.... or Submit the request with a due date interval from our SIG or your ICA and the call the Qwest</p>	<p>No, it will not delay the request. For the "Expedites Requiring Approval" process - the CLEC always had to submit the request and place a call to the call center.</p>
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	<p>Call Center), the EXP field will need to be populated on either the original LSR or on a supplemental LSR. There are a number of Qwest processes that require manual intervention (Manual Ind = Y). Qwest's requirement of using "Y" for the Manual Indicator should not prevent a CLEC from requesting an expedited due date.</p> <p>Is the above the intent and/or effect of Qwest's change? Eschelon objects to that result. If that is not the intent and/or effect, and if this change were to be made, Qwest should revise its language to specifically address this business rule and document in the PCAT this exception to the LSOG rule(s) and re-issue for comment on that language.</p> <p>2. In Qwest's red-lined document, the next change is to "Pre-Approved Expedites" for which Qwest requires an amendment and a per day fee. The first line of that change introduces a reference to a due date Qwest "can meet" outside of the context of Qwest delayed facilities. Qwest has not explained this change. The Qwest notice with the red-lined document only mentioned "updating the Expedite process to change the existing manual process . . . to return a Firm Order Confirmation" (a separate PCAT change, which is discussed below). Qwest provided no explanation of Qwest's</p>	<p>No, there is no change to the rules on how the Expedite field is populated and no change to the LSOG is applicable.</p>
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	<p>introduction for the first time of a suggestion that Qwest “can meet” some “Pre-Approved” expedite requests but not others.</p> <p>What is the basis for Qwest’s proposed change in the language?</p> <p>What are the criteria for whether Qwest “can meet” a “Pre-Approved” expedite request?</p> <p>Are the criteria changing?</p> <p>Is resource availability a factor?</p> <p>Currently, resource availability is identified in the PCAT as a factor for the emergency-based “Expedites Requiring Approval” but not generally for “Pre-Approved” expedites for a fee. There is no mention of criteria such as resource availability in the Qwest expedite amendments, which provide that Qwest will process expedite orders when the CLEC pays the fee. The Expedites for Design Services Amendment does not attach any conditions, such as Qwest resource availability, that allows Qwest to arbitrarily change the CLECs requested due date for Pre-Approved Expedites.</p> <p>If a CLEC has already signed that amendment and has obtained “Pre-Approved” expedites for a</p>	<p>To state that the due date on the FOC may be different if Qwest can not meet the desired expedited due date.</p> <p>Resource availability</p> <p>No</p> <p>Expedited due dates have always been granted based on resource availability. Interconnection Agreement amendments for “Pre-Approved” expedites have always reflected that condition. See Section 9.1.12 of the Negotiations Template Agreement.</p>
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		<p>fee, will the terms change so now a CLEC may not obtain them in some cases? Does the PCAT change affect Qwest's offering of expedites under its template ICA or amendment proposals?</p> <p>Qwest's proposed language is ambiguous. Qwest should revise it and re-issue it for comment with more clear language and more explanation.</p> <p>3. In Qwest's red-lined document, the remainder of this paragraph (relating to Qwest's "Pre-Approved Expedites") appears to allow Qwest, at its sole discretion, to return an FOC with a new due date that is different than the expedited due date requested by the CLEC for which the CLEC has agreed to pay Qwest's fee. Eschelon objects to Qwest acting in this manner at its discretion. This is contrary to Qwest's own Expedites for Design Services Amendment. The Expedites for Design Services Amendment states "Qwest will process the request and return a FOC acknowledging the expedited due date" (as does the previous PCAT language). It does not contain the language that Qwest proposes to add to the PCAT stating that Qwest may select a date different from that requested by the CLEC, return an FOC to the CLEC with that different date, and then require the CLEC to monitor for a different date and, if that "does not meet [its] needs"</p>	<p>No.</p> <p>No.</p> <p>Qwest declines this request as the PCAT adequately explains the change of process.</p>
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	<p>supplement the request. At a minimum, Qwest needs to revise and reissue this change for comment with more clear language and more explanation.</p> <p>4. Additionally, the redlined language for this section indicates that the interval is “as defined in Qwest’s SIG.” This statement is incorrect. The interval may be in the interconnection agreement, for example. Other provisions of the PCAT refer to “interval in the SIG, ICA, or ICB criteria.” If the redlined paragraph remains part of Qwest’s proposal, this language should also be modified and reissued for comment. .</p> <p>5. Qwest stated in its notice that Qwest is updating the Expedite process to change the existing manual process to improve center efficiencies by returning an FOC with the new due date instead of calling CLECs.</p> <p>Please confirm that CLECs submitting requests electronically may expect to receive an FOC from Qwest and indicate whether CLECs may rely on the information contained in the FOC sent by Qwest.</p>	<p>Qwest will change the proposed language FROM: If the due date on the FOC does not meet your needs, you can supplement the request to a due date that is equal to or greater than standard interval as defined in Qwest SIG’s, cancelling the expedite.</p> <p>TO: If the due date on the FOC does not meet your needs, you can supplement the request to a due date that is equal to or greater than standard interval as defined in Qwest SIG, ICA or ICB canceling the expedite.</p> <p>Yes, the CLEC may expect to receive an FOC. CLECs may rely on the information contained in the most current FOC, and CLECs may continue to rely on informal communications with Qwest.</p>
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From: New Cr, Cmp [Contact information redacted]
Sent: Monday, May 07, 2007 2:58 PM
To: Johnson, Bonnie J.; cmpr@qwest.com
Cc: Isaacs, Kimberly D.
Subject: RE: Process Notice: Bus Procedure: GN: CMP FNL Expedites and Escalations F45:
Effective 5-17-07

Bonnie,

This is to acknowledge receipt of your email on the final notice.

Per Section 5.4.4.1 of the CMP Document, this comment is outside of the formal comment cycle and will not be posted.

Thanks,

Lynn Stecklein
Qwest Wholesale CMP

From: Johnson, Bonnie J.
Sent: Thursday, May 03, 2007 10:04 AM
To: Bonnie Johnson; cmpr@qwest.com
Cc: Johnson, Bonnie J.; Isaacs, Kimberly D.
Subject: FW: Process Notice: Bus Procedure: GN: CMP FNL Expedites and Escalations F45:
Effective 5-17-07

In its response, Qwest states: "Yes, the CLEC may expect to receive an FOC. CLECs may rely on the information contained in the most current FOC, and CLECs may continue to rely on informal communications with Qwest." Qwest's statements are inaccurate; they are an attempt to revise history after the fact (by incorrectly referring to "continuing" to rely on informal communications); and they do not reflect the terms of Qwest's own SGAT and ICAs. Section 12.2.1.9.2 (like closed language in Section 12.2.7.2.2 of the Qwest-Eschelon proposed ICA) provides: "CLEC places an electronic order, Qwest will provide CLEC with an electronic Firm Order Confirmation notice (FOC). The FOC will follow industry-standard formats and contain the Qwest Due Date for order completion." Section 9.2.4.4.1 (like closed language in the Qwest-Eschelon proposed ICA) also provides: ". . . If Qwest must make changes to the commitment date, . . . Qwest will also submit a new Firm Order Confirmation that will clearly identify the new Due Date." Other provisions of ICAs/SGATs also require that Qwest provide notice, not through informal communications, but via the FOC. (See, e.g., CO SGAT Sections 4.0; FOC definition, 9.1.12.1.1, 9.1.2.1.3, 9.1.2.1.3.1, 9.2.2.9.3, 9.2.2.9.4, 9.2.2.9.5.3, 9.2.2.9.7.1, 9.2.4.3.1.2, 9.2.4.3.1.2.1, 9.2.4.4.1, 9.12.4.2, 10.2.5.2, 10.2.5.4.1, 12.2.1.9.2.) Regarding FOCs, the FCC said: "[W]e address the OSS ordering issues that the Commission previously has found relevant and probative for analyzing a BOC's ability to provide access to its ordering functions in a nondiscriminatory manner: a BOC's ability to return timely status notices such as firm order confirmation, reject, jeopardy, and service order completion notices, to process manually handled orders accurately, and to scale its system." FCC 271 Order, WC Docket No. 02-314 (Dec. 23, 2002), ¶85 (emphasis added). While CLECs do expect to receive an FOC, it is not merely the "most recent FOC," it is the proper FOC pursuant to these provisions. Informal communications do not replace the proper use of FOCs. CLECs should not need to rely on informal communications for advance notice, when Qwest is obligated to use the agreed upon process of providing notice via FOC.

Please include Eschelon's response in the posted materials.

Thanks,

Bonnie Johnson
Director Carrier Relations
Eschelon Telecom Inc.
[Contact information redacted]

From: mailouts2@qwest.com [mailto:mailouts2@qwest.com]

Sent: Wednesday, May 02, 2007 2:50 AM

To: Johnson, Bonnie J.

Subject: Process Notice: Bus Procedure: GN: CMP FNL Expedites and Escalations F45: Effective 5-17-07



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