

This exhibit consists of the following:

Eschelon CR PC030603-1 Detail

| http://www.qwest.com/wholesale/cmp/archive/CR_PC030603-1.htm

External Documentation Request Process Guide (excerpt provided):

| <http://www.qwest.com/wholesale/clecs/exdocprocessrequest.html>

http://www.qwest.com/wholesale/downloads/2005/050930/External_Documentation_CL_EC_Process_Guide_V4_0.ppt

Open Product/Process CR PC030603-1 Detail

Title: Documentation process to allow CLECs to request documentation of existing processes, including documentation on the Qwest Wholesale web site.

CR Number	Current Status Date	Area Impacted	Products Impacted
PC030603-1	Closed 9/17/2003	PreOrder, Ordering	All

Originator: Johnson, Bonnie

Originator Company Name: Eschelon

Owner: Coyne, Mark

Director: McNa, Sue

CR PM: Harlan, Cindy

Description Of Change

Eschelon asks Qwest to develop a quick and effective process for CLECs to obtain readily accessible documentation for existing Qwest processes without having to go through the full, lengthy Change Request (CR) process for each Qwest undocumented process. Qwest has a duty to provide clearly documented processes. When Qwest fails to do so, the burden should not be on CLECs to use CMP to obtain something that Qwest should already have in place without further action by CLECs. Nonetheless, in recent months, Eschelon has had to submit a series of CRs to obtain documented processes for several of Qwest existing processes. (For example, see OC123102-1, PC112502-1 and PC010603-1.) . This is time consuming and a burden to CLECs, even though the duty to provide documentation belongs to Qwest. Simply obtaining documentation for an existing process should not take as many steps and as much time as actually changing a process or system. The reality is that the local service ordering guide (LSOG) and Product Catalog (PCAT) do not always provide needed information, such as information needed for a CLEC to process an accurate LSR, particularly when manual handling is required. Although Qwest has existing internal processes, Qwest has not documented many of those processes for CLECs. Without adequate documentation, when the process breaks down, CLECs are forced to spend unnecessary time and resources debating with Qwest representatives about the process itself, when those challenges could be avoided by simply pointing to mutually accessible documentation that clearly states the process for all involved. Instead, unnecessary escalations waste CLEC and Qwest resources. To avoid this scenario, Qwest needs to provide clear documentation that is readily accessible to CLECs. When Qwest fails to do so, Qwest should have a process in place to obtain the documentation without submitting a CR. CLECs should be involved in development of this process to ensure it meets their needs. The process could include, for example, a CLEC notice of an undocumented process to a specified Qwest single point of contact for this issue and a designated interval for responding to the request and circulating the new documentation that will be posted on the web site. With such a process, the necessary documentation could be provided much

more quickly to the CLECs.

Expected Deliverable:

Qwest to develop a process to provide adequate and complete documentation on the Qwest Wholesale web site, in a user-friendly location and format, for existing processes identified by a CLEC or CLECs. Because these are Qwest existing processes and do not require development, the time to document the process should be minimal. Therefore, the process to obtain the documentation should be quick and easy.

Status History

Date	Action	Description
3/6/2003		Received CR from Eschelon
3/10/2003		Acknowledged CR by P/P CMP Manager
3/12/2003		Contacted Customer and scheduled Clarification Meeting for 3/18/03 9:30 - 10:00
3/18/2003		Held Clarification Meeting
3/19/2003		March CMP Meeting minutes will be posted to the database
4/16/2003		April CMP Meeting minutes will be posted to the database
4/24/2003		Notification advising of CLEC review meeting scheduled for May 14 from 11:30 - 1:00 mst.
5/14/2003		Reviewed Draft process with CLEC Community. Agreed to set up trial with 3 CLECs.
5/21/2003		May CMP Meeting Minutes will be posted to the database
6/3/2003		Training was held for CLECs participating in the trial (Eschelon, ATT and Allegiance). The trial will start effective June 16, 2003.
6/18/2003		June CMP Meeting Minutes will be posted to the database. Bonnie agreed to move this CR to CLEC Test status.
7/16/2003		July CMP Meeting Minutes posted to the database
7/30/2003		Held meeting to gather input from the trial. See notes for details.
8/9/2003		Documentation process released Level 1 (trial CLECs agreed to Level 1)
8/20/2003		August CMP Meeting Minutes - see notes
9/10/2003		Provided existing process information to Eschelon: An existing process is a Qwest standard operating methodology that is normally or usually followed and not included in external Qwest documentation available to CLECs.
9/17/2003		Sep CMP meeting notes will be posted to the database

Project Meetings

September 17, 2003 CMP Meeting Minutes Cindy Macy – Qwest advised this process is in place and working. Cindy Macy did forward to Bonnie the information regarding 'existing process'. Bonnie Johnson-Eschelon advised she appreciated the response but she will escalate if the documentation team is not in agreement with her documentation requests. Cindy Macy explained that the Documentation team will pull together the SMEs and the CLEC to discuss the CR if there are any questions or concerns about accepting the CR. This group would try to resolve the questions, and if not it could be escalated to Mark Coyne and Sue McNa. Bonnie agreed to close this CR.

August 20, 2003 CMP Meeting Minutes Mark Coyne – Qwest advised the trial ended July 7. Twelve requests came in. Three requests have been completed. Five will publish in two weeks. Two were closed per the CLECs. Two were originally denied and are now back in review. The team met on July 28 to review the trial. As a result of the trial three updates were requested: 1- send confirmation back This has been implemented

2- provide submit button The developer advised the tab button is used to move between fields and the enter key is used to submit the form

3- escalation / review process The process is updated to include a clarification / review call if needed

Training began on August 4 and the process was implemented August 11. Since then, five additional requests have come in and are being worked on.

Bonnie asked for status regarding her question "what is the definition of an existing process?" Is a process considered 'existing' if it is documented internally at Qwest but not documented for CLECs? Or is it any process that is being used by Qwest. Cindy Macy – Qwest advised the definition of an existing process is being looked at. Bonnie advised this affects Level 2 notices also. Liz confirmed the documentation process includes documenting 'gaps' in existing processes. Cindy Macy – Qwest advised the concern is over documenting individual case processes that are unique. Cindy Macy – Qwest advised additional information will be provided at the next meeting.

CLEC Change Request – PC030603-1 Meeting minutes - Review
Documentation Process trial Wednesday, July 30, 2003

Attendees Cindy Macy – CRPM Mark Coyne – Qwest Jackie Cole – Qwest
Carla Pardee – ATT Bonnie Johnson – Eschelon Kim Issacs – Eschelon Lori
Mendoza – Allegiance Liz Balvin - MCI

Cindy Macy -Qwest welcomed all attendees and reviewed that the purpose of this meeting is to obtain input on how the Documentation trial went. The main concern has to do with accepting and denying Documentation CRs.

Carla Pardee – ATT shared that she believed this was a very good step for Qwest and it has been easy to use so far. She also said that she is very happy that we will be including certain system documentation in the process.

Bonnie Johnson – Eschelon advised she is frustrated about the level of detail on manual processes and that these are not documented clear

enough. Bonnie advised the PCAT put together by Joan Wells for Port Within is an example of a process that is documented to the correct level of detail. Bonnie advised the CLECs need the level of detail to send a good LSR and not have to guess or get the LSR rejected. Bonnie also said this process is easier and quicker and it has a lot of benefits.

Lori Mendoza – Allegiance explained her Service Manager worked with Russ Urevig on a process and got the PCAT updated without any CR (CLEC documentation or CMP). The team agreed this can happen with an internal documentation request. The team agreed the Service Managers or process specialist can and do initiate requests on their own.

Mark and the CLECs discussed the CR request for RPON. This was a CR that was originally denied. Mark agreed to add additional detail to the PCAT overview regarding RPON. Mark's concern has to do with exception processing or situations that are unique or handled as an individual case. Qwest can not document every unique or possible condition. Mark agreed when there is a concern over denying a documentation CR the documentation team will hold a (15 minute) conference call with the product process person, service manager, documentation team and CLEC to discuss and clarify.

Liz Balvin – MCI advised she also has concerns over the use of LA versus SA. Mark asked for examples of this problem and he would be glad to investigate. He will leave this documentation request open until we get examples to proceed. **We have not received examples as of August 5. Please forward examples for us to continue working on this item.

Kim Issacs- Eschelon had the following questions: 1. Submission process - If you hit enter after or at the end of the sentence this sends the CR, even though you may only be ½ done filling out the request. Jackie agreed she would check on this. 2. After submit, the confirmation doesn't send back the description, only a confirmation. Jackie advised this should be fixed and she will check on it. 3. On denials – the CLECs would like to talk to the process person or get a reason why the CR was denied. Mark advised the documentation team will put together a conference call to discuss requests that are denied. 4. When a request has been accepted what Level will it be? The team discussed the level and agreed none of the documentation requests will be handled as a level 0. The request is for them to be at least a Level 1

Bonnie and Mark discussed the concern over Level 2 Bullet #8 and the definition of an existing process. Bonnie asked what is considered an existing process? What is the criteria for an existing process? Is a process that is being used considered an existing process? Cindy Macy agreed she would clarify the intent of this bullet.

The group discussed this process will be available on the web site August 11. We discussed the level that this process should be released under and the team agreed we should use a Level 1 Notification.

July CMP Meeting Minutes - Mark Coyne – Qwest reported the trial completed last week on July 11, 2003. There were twelve CRs received. Eight were accepted. Out of the eight accepted, one is published and seven are in progress. Of the four remaining one was closed, one was published and two were denied. The target implementation date in the middle of

August. We have a meeting scheduled for the week of 7/21 to review the trial results. The CLECs would like to discuss the denial CRs and determine if there is a change that can be made to the denial step. Mark explained Qwest struggles with the level of detail and how much exception processing we document. Bonnie gave an example of LA versus SA and how that causes much confusion in LSR processing. Bonnie requested for the level of detail to not allow for anything to be left to interpretation. She would like to have the information needed to successfully submit the LSR without it being rejected. Bonnie explained she is asking for the same opportunity to have the same information that is available to Qwest. Mark Coyne – Qwest advised this may lead Qwest to revisit the scope and criteria of the Documentation Process. Bonnie Johnson – Eschelon stressed that the process is working, we just have this one glitch to work on. Mark Coyne – Qwest advised we will discuss more next week. This CR will stay in CLEC Test.

June CMP Meeting Minutes - Mark Coyne advised they have received 4-5 documentation requests and are working on them. The training is completed for the CLECs, Service Managers and 50% of the Product/Process Specialists. Qwest would like to move this to CLEC Test. Bonnie advised that was okay.

May CMP Meeting Minutes -

Mark Coyne – Qwest advised we met with the CLECs on May 14, 2003. There was good participation and the process was received very well. Qwest will make minor updates based on comments received. Qwest will trial the process with 3 CLECs: Eschelon, ATT and Allegiance. Qwest will train the 3 CLECs on June 3, with the trial taking place the middle of June – middle of July. Implementation will occur the first week of August. Qwest will leave this CR in Development status. Bonnie Johnson – Eschelon commented the documentation team did a very good job on the process.

PC030603-1 Documentation Process Ad Hoc Meeting May 14, 2003

Review CLEC Documentation Request Process with CLEC Community

In Attendance: Sheila Raunig – Qwest Candice Mowers – Qwest Sharon Van Meter – ATT Donna Osborne Miller – ATT Susan Lamb – Open Access Lori Mendoza – Allegiance Bonnie Johnson – Eschelon John Berard – Covad Jeff Tietz – Qwest Kim Issacs – Eschelon Jackie Cole – Qwest Jill Martain – Qwest Jen Arnold – US Link Sue Mcna – Qwest Cindy Macy – Qwest Mark Coyne – Qwest Liz Balvin – Qwest

Cindy Macy Qwest reviewed the purpose of the meeting and discussed what steps the team has gone through so far. Everyone confirmed they had a copy of the process material to be reviewed.

Mark Coyne reviewed the process in detail. The process was discussed with the following questions/answers provided.

Donna Osborne-Miller reviewed the Scope table and discussed what was in and out of scope.

Bonnie Johnson asked why there are multiple times / places in the process that the scope is reviewed. Mark advised there is a first cut high level view

by the documentation team when the request comes in and then the SME makes the lower level more detailed review.

Sharon Van Meter asked if the comment cycle still applied, as she wanted to be sure they had the opportunity to comment if they were not happy with the process documentation. Mark advised yes, the Level 1 / 2 comments cycle would apply. Sue Mcna advised the documentation would be placed on the document review web site as it is done today.

Liz Balvin asked if Qwest is subject to this same process. Sue Mcna advised we are using a version of this same process today. The internal requests are subject to the same 'in scope/out of scope' review.

Mark Coyne reiterated the work will be handled first in / first out.

Bonnie Johnson asked if all the fields are required on the Request form. Mark advised no. Bonnie said they might not have data for all the fields. Bonnie wanted to make sure the 'Detailed Description of Change' allowed for unlimited or adequate space. Jackie – Qwest advised she would double check the space available and make sure it is large enough.

Bonnie Johnson asked if Qwest would be matching the requests for synergies since we will be handling them FIFO (first in first out). Mark advised we would look at people's workload and synergies to manage the volume.

Cindy asked if we could move existing CRs to this process if the timing was appropriate. The team agreed that would be okay if the timing worked. Carla asked about a CR that was currently in the response cycle. The team agreed this one would not be a good candidate as it is almost through the process.

Mark advised we would like to trial this process initially. Cindy asked for 2-4 CLECs to trial the process. Eschelon, ATT and Allegiance volunteered to participate in the trial. Sheila – Documentation team advised Qwest would schedule a training session with the trial CLECS. The team agreed to trial the process for approximately a 1-month time frame. The trial team will meet again to review and provide input to the process during the trial.

The CLECs advised the process was well done and very few questions or changes were needed.

Thanks, Cindy Macy

4/16/03 April CMP Meeting - PC030603-1 Documentation Process

Mark Coyne – Qwest advised we are currently meeting to develop a process to support this CR. We are reviewing the CR internally and then will set up a meeting to review and gather input from the CLEC Community. Qwest would like to move this CR to Development status.

3/19/03 March CMP Meeting Minutes - This CR was walked on during the March CMP meeting Bonnie Johnson advised we held the Clarification call on March 18 and she believes Qwest understands the request. Bonnie advised the CLECs would like a process, outside of the CMP process, to

advise Qwest about documentation that is missing, in error, or lacking information. Bonnie advised they sometimes need more detail than is in the LSOG. CLECs go to their Service Manager for help but the end result is not updated in the documentation so they continue to go through the same problem. Bonnie advised it is not her responsibility to issue a CR to have the documentation updated after they figure out how to issue the LSR. Sue McNa recapped Bonnie's request and advised Qwest agreed to look at the CR and brainstorm to determine how to handle this request. Sue advised we want to address how the CLECs can best communicate documentation issues to Qwest and also provide prioritization of the work they identify.

Clarification Meeting March 18, 2003 1-877-572-8688 3393947#

PC030603-1 Documentation Process to allow CLECs to request documentation of existing processes, including documentation on the Qwest Wholesale Web Site

Attendees Jill Martain – Qwest Judy DeRosier – Qwest Sue McNa – Qwest Bonnie Johnson - Eschelon Nancy Chapman – Qwest Cindy Macy - Qwest

Meeting Agenda 1.0 Introduction of Attendees Attendees Introduced

2.0 Review Requested (Description of) Change Bonnie reviewed and clarified the CR. Bonnie explained she is asking for existing processes that are not documented on the Qwest Wholesale web site to be documented without going through the CMP process. It is Eschelon's belief that Qwest should have these processes documented. Bonnie would like an easy way for the CLECs to be able to request the process to be documented.

Bonnie explained they have been working with the Service Management team on LSR processes such as rejects. We will get an email from Qwest that explains how to issue the LSR. This information should already be on the web site. The responsibility falls on the CLEC to issue the CR and get the process documented. Bonnie would like a process outside of CMP for documentation requests.

Sue Mcna asked for Bonnie to share her thoughts on how this would work, what the CLECs would like.

Bonnie explained possibly a Level 2 Notification would still be required such as 'Document an existing process that has not been documented before'. The process should be quick and efficient for Qwest too. The process may need a Project Manager.

Sue Mcna said Qwest values the input from the CLECs. We don't always know what documentation is missing. How would the CLECs notify Qwest of missing / errors in documentation?

Bonnie offered the idea of having it as a 'standing agenda item' at the end of the Monthly CMP Product Process Meeting.

Bonnie provided another example of a documentation issue using the documentation links. They do not always link you to the correct process or the process is not detailed enough to help. Then the LSR gets rejected. The LSOG is not always to the level of detail that is needed. They need more

details on the 'Business Rules'.

Bonnie also suggested the web site provide look ups by Process not Product. Sue Mcna advised restructuring the web site would be a huge effort.

Sue clarified what Bonnie is suggesting is an: - easy way to communicate to Qwest missing documentation - errors in documentation - gaps or missing information in documentation

Sue asked how the CLECs would prioritize the requests. Suggestions were possibly by identifying what processes are critical or most problematic.

Cindy agreed she would set up an internal working session meeting to begin discussing the CR. Bonnie will present this CR at the March 19 CMP meeting.

3.0 Confirm Areas & Products Impacted Documentation

4.0 Confirm Right Personnel Involved Mark Coyne, Jill Martain, Joann Garramone, Candace Mauers, Service management resource

5.0 Identify/Confirm CLEC's Expectation Sue clarified what Bonnie is suggesting is an: - easy way to communicate to Qwest missing documentation - errors in documentation gaps or missing information in documentation

6.0 Identify any Dependent Systems Change Requests None

7.0 Establish Action Plan (Resolution Time Frame) Bonnie will present at the March CMP Meeting Cindy will set up internal meeting to begin working on resolution

QWEST Response

For Review by the CLEC Community and Discussion at the May 21, 2003 CMP Meeting

May 14, 2003

Eschelon Bonnie Johnson

SUBJECT: Qwest's Change Request Response – CR #PC030603-1
Documentation Process to allow CLECs to request documentation of existing processes

This letter is in response to Eschelon's Change Request (CR) PC030603-1. This CR requests that Qwest establish a process for the CLECs to request documentation on existing processes or gaps in existing processes.

Qwest accepts this CR and is currently developing: ? A Process to address documentation updates outside of CMP ? A Process for tracking and completing external documentation updates

In addition, Qwest has scheduled a walkthrough of the process with Eschelon and other CLECs. This meeting is scheduled for May 14, 2003 from 11:30 – 1:00 MST.

Qwest requests this CR be placed in Development Status and will provide an update at the June CMP Meeting.

Sincerely,

Mark Coyne Qwest





CLEC External Documentation Request Process Guide

September 2005
V4.0

For inquiries regarding updates/maintenance to this course, contact:

Jackie Cole
307-772-4742
Jacqueline.Cole@qwest.com

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In Scope	Out of Scope
Undocumented existing process	Changes to an existing process
Gaps or missing information in existing processes	New or modified process
Clarification of existing processes	System impacting changes (also known as Modified Level 2 or OSS System changes)
Level 1 and 2 type changes only	Level 3 and 4 type changes

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Within 2 business days from receipt of request the following e-mail will be system generated to the CLEC and Service Manager.

Subject: External Documentation Request #(ID #)-Short Description of Request

Your documentation request no. (ID #) has been received and is currently being reviewed. You will be notified within 14 business days whether your request is accepted or denied. For questions please contact your Service Manager.

Thank you,

The External Documentation Change Request Team

This e-mail is the acknowledgement of receipt,
and the date the e-mail is sent represents the
Acknowledgement Date.

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