

ATTACHMENT 1 -- TESTIMONY MAP -
ISSUES BY SUBJECT MATTER – UTAH
Prepared by Eschelon

CMP DISCUSSION – (NOT ISSUE SPECIFIC)

E – Starkey Direct, pp. 12, 15-16, 19-23, 25-31, 38-114, 118, 124-126, 129-133, 168-172, 175	Q – Albersheim Direct, pp. 3, 21-22
E- Starkey Rebuttal, pp. 15, 57	Q – Albersheim Rebuttal, pp. 2, 7, 13
E – Starkey Surrebuttal, pp. 3, 33, 36	Q – Albersheim Surrebuttal, p. 1

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

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

E – Starkey Direct, pp. 16-17, 107-114, 124-126, 213-214	Q – Albersheim Direct, p. 27
E – Starkey Rebuttal, pp. 9, 12, 21, 60-62, 68, 73, 143	Q – Albersheim Rebuttal, pp. 27, 5 Q – Albersheim Surrebuttal, p. 1, 7, 16
E – Starkey Surrebuttal, p. 2, 59, 60-61, 64	

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

E – Starkey Direct, pp. 111, 113, 121
E – Starkey Rebuttal, p. 61
E – Starkey Surrebuttal, p. 37

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

E – Starkey Direct, pp. 111, 113, 121
E – Starkey Rebuttal, p. 61

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

E – Starkey Direct, pp. 111, 113, 121
E – Starkey Rebuttal, p. 61

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

E – Starkey Direct, pp. 112-113, 122-123
E – Starkey Rebuttal, p. 61

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

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

E – Starkey Direct, pp. 113, 121

E – Starkey Rebuttal, pp. 63

2. RATE APPLICATION – ISSUE 2-3

Issue 2-3: Application of Rates in Exhibit A -- Section 2.2 (1 of 2 issues); *see also* Section 22 (1 of 2 Options)

**E – Denney Direct, pp. 9-12,
14, 16, 18, 21, 23, 28**

Q – Easton Direct, pp. 2, 3, 5

E – Denney Rebuttal, pp. 2-3

Q – Easton Rebuttal, pp. 2-3

E – Denney Surrebuttal, p. 2, 3, 4

Q – Easton Surrebuttal, p. 2

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

Issue 2-4: Effective Date of Legally Binding Changes -- Section 2.2 (2 of 2 issues) (1 of 2 Options) and (2 of 2 options – Proposal #2 is for entire section 2.2, and has a related component in 22.4.1.2)

**E - Denney Direct, pp. 9-12, 14,
16-18, 21, 23, 28**

Q – Easton Direct pp. 2, 6, 8

E – Denney Rebuttal, pp. 2-3, 10-11

Q – Easton Rebuttal, p. 4, 8

E – Denney Surrebuttal, p. 2, 4-7

Q – Easton Surrebuttal, p. 5

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

Issue 4-5: Design Changes for Loops – Section 9.2.3.8

**E – Denney Direct, pp. 28-29, 31, 34,
39, 40, 45-46, 58-59, 213**

Q – Stewart Direct, pp. 7-8

E – Denney Rebuttal, pp. 11-15, 22

Q – Stewart Rebuttal, pp. 1-2

E – Denney Surrebuttal, p. 13-15, 29

Q – Million Surrebuttal, p. 12 (All Issues)

Q – Stewart Surrebuttal, p. 1, 2

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

**E – Denney Direct, pp. 28-29, 33-34,
45, 55-59**

Q – Stewart Direct, p. 7

E – Denney Rebuttal, pp. 11, 13, 17

Q – Stewart Rebuttal, pp. 1, 3, 6

E – Denney Surrebuttal, p. 13, 15

Q – Stewart Surrebuttal, p. 1, 3

Issue 4-5(b): Intentionally Left Blank

E – Denney Direct, pp. 28, 40
E – Denney Rebuttal, p. 11-12

Q – Stewart, Direct, p. 7-8
Q – Stewart Rebuttal, pp. 1-2

Issue 4-5(c): Design Change Charge – Exhibit A, Section 9.20.11 and subparts

E – Denney Direct, pp. 28-29, 34-36
57-58

Q – Stewart, Direct, p. 8

E – Denney Rebuttal, pp. 11, 13, 17, 23

Q – Stewart Rebuttal, pp. 7, 10

E – Denney Surrebuttal, p. 13-15

Q – Stewart Surrebuttal, p. 1, 7

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

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

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

E – Denney Direct, pp. 59, 67-68, 70,
81, 100

Q – Easton Direct, pp. 2, 10, 11, 17

E – Denney Rebuttal, pp. 35, 38-39, 42

Q – Easton Rebuttal, p. 11

E – Denney Surrebuttal, p. 38, 45-46

Q – Easton Surrebuttal, pp. 8-10

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

E – Denney Direct, pp. 59, 67-72, 81,

Q – Easton Direct, pp. 2, 15, 19

E – Denney Rebuttal, pp. 35, 38

Q – Easton Rebuttal, p. 11

E – Denney Surrebuttal, p. 38-39,
45-46

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

E – Denney Direct, pp. 59, 67-68, 70,

Q – Easton Direct, pp. 2, 18

E – Denney Rebuttal, p. 35

Q – Easton Rebuttal, p. 11

E – Denney Surrebuttal, p. 38-39, 45

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

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

E – Denney Direct, pp. 59, 82-89, 91,
95, 100

Q – Easton Direct, pp. 2, 10, 19-20

E – Denney Rebuttal, pp. 35

Q – Easton Rebuttal, p. 16

E – Denney Surrebuttal, p. 38-39,
45-46, 52-53

Q – Easton Surrebuttal, pp. 8, 12

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

E – Denney Direct, pp. 59, 82-88, 90, 95, 100 **Q – Easton Direct, pp. 2, 10, 22**

E – Denney Rebuttal, pp. 35-36, 47 **Q – Easton Rebuttal, p. 25**

E – Denney Surrebuttal, p. 38-39, 45-46 **Q – Easton Surrebuttal, pp. 8, 13**
52

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

E - Denney Direct , pp. 59, 82-83, 85-87, **Q – Easton Direct, p. 2, 23**
92, 95, 100

E – Denney Rebuttal, pp. 35-36, 50 **Q – Easton Rebuttal, p. 3, 26**

E – Denney Surrebuttal, p. 38-39, **Q – Easton Surrebuttal, pp.8, 15**
45-46, 52, 54

Issue 5-12 (Alternative Approach to Deposits): Commission Determines Right to Deposit based on Relevant Circumstances –Section 5.4.5 (all)

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

E – Denney Direct, pp. 59, 82-83, **Q – Easton Direct, pp. 2, 10, 19, 24**
85-87, 94, 100

E – Denney Rebuttal, pp. 35-36, 51-52 **Q – Easton Rebuttal, p. 26, 30**

E – Denney Surrebuttal, p. 38, 40, 45-46, **Q – Easton Surrebuttal, p. 8, 16**
52, 54

7. REVIEW OF CREDIT STANDING – ISSUE 5-13

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

E - Denney Direct, pp. 59, 95-96, **Q – Easton Direct, pp. 2, 10, 26**
100

E – Denney Rebuttal, pp. 35-36, 53-57 **Q – Easton Rebuttal, p. 26**

E – Denney Surrebuttal, p. 38, 40, **Q – Easton Surrebuttal, p. 8, 17**
45-46, 55, 59

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

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

E – Denney Direct, p. 101

Q – Easton Direct, pp. 2, 28

E – Denney Rebuttal, p. 58

Q – Easton Rebuttal, p. 29

E – Denney Surrebuttal, p. 64

Q – Easton Surrebuttal, p. 20

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

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

E – Denney Direct, pp. 105-106

Q – Easton Direct, pp. 2, 30, 33

E – Denney Rebuttal, p. 62

Q – Easton Rebuttal, p. 30

E – Denney Surrebuttal, p. 65

Q – Easton Surrebuttal, p. 22

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

E – Denney Direct, pp. 105-106

Q – Easton Direct, pp. 2, 30, 33

E – Denney Rebuttal, p. 62

Q – Easton Rebuttal, p. 30, 15

E – Denney Surrebuttal, p. 65

Q – Easton Surrebuttal, p. 22

10. INTENTIONALLY LEFT BLANK (FORMERLY COLLOCATION AVAILABLE INVENTORY – ISSUES 8-20 and (a))

11. POWER – ISSUES 8-21 and (a) – (f), 8-22, 8-23

Issue 8-21: 48V Power Measurement - 8.2.1.29.2.1

Issue 8-21(a): 48V Power Measurement - 8.2.1.29.2.2

Issue 8-21(b): 48V Power Measurement – 8.3.1.6

Issue 8-21(c): 48V Power Measurement – 8.3.1.6.1

Issue 8-21(d): 48V Power Measurement – 8.3.1.6.2 and subparts a & b

Issue 8-21(e): 48V Power Measurement – Exhibit A, Section 8.1.4.1 and subparts

Issue 8-21(f): Intentionally Left Blank

Issue 8-22: QPF – 8.3.9.1.3, 8.3.9.2.3

Issue 8-23: Intentionally Left Blank

12. INTENTIONALLY LEFT BLANK (FORMERLY NEBS STANDARDS – ISSUE 8-24)

13. INTENTIONALLY LEFT BLANK

14. NONDISCRIMINATORY ACCESS TO UNES – ISSUE 9-31

Issue 9-31: Nondiscriminatory Access to UNEs – Section 9.1.2 (Two Eschelon proposals and one Qwest proposal for the same issue)

E – Starkey Direct, pp. 13, 127, 130, 132, 134-135, 142-143 **Q – Stewart Direct, pp. 15, 16, 21**

E – Starkey Rebuttal, pp. 2, 74, 82, 91, 134 **Q – Stewart Rebuttal, pp. 1, 10, 18**

E – Denney Surrebuttal, p. 68, 21, 70 **Q – Stewart Surrebuttal, p. 10**

E – Starkey Surrebuttal, p. 2, 11, 67, 70, 72-73, 79

15. INTENTIONALLY LEFT BLANK (FORMERLY DELAYED ORDERS WHEN FACILITIES ARE NOT AVAILABLE –ISSUE 9-32 and (a)–(c))

E – Starkey Direct, FN 42, 56, 90, 149 **Q – Stewart Direct, p. 2**

E – Starkey Rebuttal, FN 2, 19, 99, 136

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

Issue 9-33: Affect on End User Customers -- Section 9.1.9; Section 9.1.9.1

E – Starkey Direct, FN 20, 269, 281 **Q – Stewart Direct, pp. 21, 24, 31, 282**

E – Starkey Rebuttal, pp. 2, 102-103, 105, 107, 109, 113-115, 117-118 **Q – Stewart Rebuttal, pp. 1, 18, 23**

E – Starkey Surrebuttal, p. 2, 84-85, 88, 93-95, 97 **Q – Stewart Surrebuttal, p. 13, 16**

Issue 9-34: Location at Which Changes Occur -- Sections 9.1.9, 9.1.9.1

E – Starkey Direct, pp. 8, 13, 143, 145 -146, 148-149, 160-161, 163-166 **Q – Stewart Direct, pp. 21, 29, 30**

E – Starkey Rebuttal, pp. 2, 102-104, 106, 116-118 **Q – Stewart Rebuttal, pp. 1, 18, 22, 24**

E – Starkey Surrebuttal, p. 2, 84-85 95-97 **Q – Stewart Surrebuttal, p. 13, 16**

17. INTENTIONALLY LEFT BLANK (FORMERLY WIRE CENTER – ISSUES 9-37; 9-37(a); 9-37(b); 9-38; 9-39 (except CAPS); 9-40; 9-41 and 9-42)

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

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

E – Starkey Direct, pp. 15, 17, 97, 167, 169, 170-171, 173-175, 178, 180, 188-189 **Q – Million Direct, pp. 6**

E – Starkey Rebuttal, pp. 2, 10, 21, 118-122, 134 **Q – Million Rebuttal, p. 2**

E – Starkey Surrebuttal, p. 2, 30, 99-104 **Q – Million Surrebuttal, p. 1 (All Issues)**

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

E – Starkey Direct, pp. 17, 97, 167, 169-171, 173-175, 183, 188-189 **Q – Million Direct, pp. 6**

E – Starkey Rebuttal, pp. 2, 10, 118-122, 134 **Q – Million Rebuttal, pp. 2**

E – Starkey Surrebuttal, p. 2, 30, 99-104

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

E – Starkey Direct, pp. 173-174, 184-187

E – Starkey Rebuttal, p. 118

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

E – Starkey Direct, pp. 173-174, 186-187

E – Starkey Rebuttal, p. 118

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

E – Starkey Direct, pp. 173-174, 187

E – Starkey Rebuttal, p. 118

19. INTENTIONALLY LEFT BLANK

-
- *PHASE OUT OF PRODUCTS/SERVICES (22)*

20. INTENTIONALLY LEFT BLANK (FORMERLY SUBLOOPS – QWEST CROSS CONNECT/WIRE WORK – ISSUE 9-50)

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

21. INTENTIONALLY LEFT BLANK

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

Issue 9-53: Unbundled Customer Controlled Rearrangement Element (UCCRE) – 9.9.1

E – Denny Direct, pp. 109, 111, 117	Q – Stewart Direct, pp. 35, 46
E – Denney Rebuttal, pp. 69-70	Q – Stewart Rebuttal, pp. 1, 26, 32
E – Denney Surrebuttal, p. 87	Q – Stewart Surrebuttal, p. 17

22A.² INTENTIONALLY LEFT BLANK (FORMERLY APPLICATION OF UDF-IOF TERMINATION (FIXED) RATE ELEMENT – ISSUE 9-51)

23. INTENTIONALLY LEFT BLANK (FORMERLY DIFFERENT UNE COMBINATIONS – ISSUES 9-54 and (a))

24. LOOP-TRANSPORT COMBINATIONS – ISSUE 9-55

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

E – Starkey Direct, pp. 14, 189-190, 192, 194, 197-198, 209	Q – Stewart Direct, pp. 47-48, 59,
E – Starkey Rebuttal, pp. 2, 128-129, 132	Q – Stewart Rebuttal, pp. 1, 33, 35, 45
E – Starkey Surrebuttal, p. 2, 104, 108, 112, 114	Q – Stewart Surrebuttal, p. 19

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

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

E – Denney Direct, p. 125	Q – Stewart Direct, pp. 53-54
E – Denney Rebuttal, p. 80	Q – Stewart Rebuttal, pp. 1, 40
E – Denney Surrebuttal, p. 91	Q – Stewart Surrebuttal, p. 21

Issue 9-56(a): Audits - Notice – Section 9.23.43.1.1.1.1

E – Denney Direct, p. 125-126	Q – Stewart Direct, pp. 53, 55, 57
E – Denney Rebuttal, p. 80	Q – Stewart Rebuttal, pp. 1, 40
E – Denney Surrebuttal, p. 91	Q – Stewart Surrebuttal, p. 21

² Issue 9-51 was not assigned a Subject Matter number in Minnesota. To carry the numbering from state-to-state, for ease of reference for witnesses for all parties testifying in multiple states, an “A” is used here, rather than renumbering the remaining Subject Matters listed. Issue 9-51 is also slightly out of order, since Issues 9-50 and 9-53 may sometimes be discussed together.

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

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

E – Denney Direct, pp. 128, 130-131, 135, 143-145, 155 **Q – Stewart Direct, pp. 58, 60, 64**

E – Denney Rebuttal, p. 82 **Q – Stewart Rebuttal, pp. 44-45, 48, 51, 53**

E – Denney Surrebuttal, p. 93 **Q – Stewart Surrebuttal, p. 23**

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

E – Denney Direct, pp. 128, 131, 134 -135, 145, 155 **Q - Stewart Direct, pp. 63, 65 66, 69**

E – Denney Rebuttal, p. 82 **Q – Stewart Rebuttal, pp. 44,**

E – Denney Surrebuttal, p. 93 **49, 54, 57**
Q – Stewart Surrebuttal, p. 25-26

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

E – Denney Direct, pp. 128, 131, 136, 148-149 **Q – Stewart Direct, pp. 63, 69-71 73**

E- Denney Rebuttal, p. 82 **Q – Stewart Rebuttal, pp. 44, 49**

E – Denney Surrebuttal, p. 93 **57, 59, 61**

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

E – Denney Direct, pp. 128, 132, 136, 150, 156 **Q – Stewart Direction, pp. 63, 73, 75**

E – Denney Rebuttal, p. 82 **Q – Stewart Rebuttal, pp. 44,**

E – Denney Surrebuttal, p. 93 **49, 61, 63**

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

E – Denney Direct, pp. 128, 133, 136, 146, 151 **Q – Stewart Direct, pp. 63, 75-76**

E – Denney Rebuttal, p. 83 **Q – Stewart Rebuttal, pp. 44, 49**

E – Denney Surrebuttal, p. 93 **63**

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

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

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

**E – Starkey Direct, pp. 14, 198-199 Q – Stewart Direct, pp. 84-85
203-204, 208, 215**

**E – Starkey Rebuttal, pp. 2, 136-138, Q – Stewart Rebuttal, pp. 68, 75
142-144**

**E – Starkey Surrebuttal, p. 2, 114-118, Q – Stewart Surrebuttal, p. 26
120, 122**

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

**E – Starkey Direct, pp. 199, 204, Q – Stewart Direct, pp. 84-86,
208-210, 214-215 88**

E- Starkey Rebuttal, p. 137 Q – Stewart Rebuttal, p. 68

E – Starkey Surrebuttal, p. 116, 118 Q – Stewart Surrebuttal, p. 26

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

**E – Starkey Direct, pp. 202, 204 , Q – Stewart Direct, pp. 84-85, 89
207-208, 213-214**

E – Starkey Rebuttal, pp. 138, 143 Q – Stewart Rebuttal, pp. 68

E – Starkey Surrebuttal, p. 116 Q – Stewart Surrebuttal, p. 26

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

**E – Starkey Direct, pp. 221-222, Q – Stewart Direct, pp. 84-85, 91
226-227, 233-234**

E – Starkey Rebuttal, p. 138

E – Starkey Surrebuttal, p. 116, 117 Q – Stewart Surrebuttal, p. 26

28. INTENTIONALLY LEFT BLANK (FORMERLY MICRODUCT RATE - ISSUE 10-63)

E – Denney Direct, p. 200

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

Issue 12-64: Root Cause & Acknowledgement of Mistakes -- Section 12.1.4 and subparts (all)(Two Eschelon proposals)

**E – Johnson Direct, pp. 8, 31, 43, Q – Albersheim Direct, pp. 39, 44
45, 47, 49, 51-52, 55, 58**

E – Johnson Rebuttal, pp. 2
E – Johnson Surrebuttal, p. 6

Q – Albersheim Rebuttal, p. 32
Q – Albersheim Surrebuttal, p. 1, 7
18

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

E – Johnson Direct, pp. 43, 48,
55-56, 58
E – Johnson Rebuttal, p. 2
E – Johnson Surrebuttal, p. 6

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

E – Johnson Direct, pp. 43, 48,
55-58
E – Johnson Rebuttal, p. 2
E – Johnson Surrebuttal, p. 6

30. INTENTIONALLY LEFT BLANK (FORMERLY COMMUNICATIONS WITH CUSTOMERS – ISSUES 12-65, 12-66 and 12-66(a))

Issue 12-65: Responsibilities Relating to End User Customers – Repair -- Section 12.1.5.4.7

E – Johnson Direct, pp. 8, 52
E – Johnson Rebuttal, p. 30

Issue 12-66: Responsibilities Relating to End User Customers – Winbacks – Section & 12.1.5.5

E – Johnson Direct, pp. 8, 31,
52
E – Johnson Rebuttal, p. 30, FN 100

Issue 12-66(a): Responsibilities Relating to End User Customers – Repair – Section 12.1.5.4.8 (Eschelon seeking clarification that this language is closed)

E – Johnson Rebuttal, p. 30, FN 100

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

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

Issue 12-67: Expedited Orders -- Section 12.2.1.2

E – Starkey Direct, pp. 15, 17, Q – Albersheim Direct, pp. 44, 47
126
E – Starkey Rebuttal, pp. 10, 12, Q–Albersheim Rebuttal, pp. 5, 37, 50

21, 52

E - Denney Surrebuttal, p. 102, 112-113, 121 **Q – Albersheim Surrebuttal, p. 1, 7, 21**

E – Johnson Surrebuttal, p. 14 **Q – Million Surrebuttal, p. 20**

Issue 12-67(a): Expedited Orders – Emergencies --

Section 12.2.1.2.1

E – Denney Direct, pp. 159, 166-167, 169-170, 172-173, 195, 199 **Q – Albersheim Direct, p. 47**

E – Denney Rebuttal, pp. 94-95, 114-116

E – Denney Surrebuttal, p. 102, 104-105, 109, 13, 115, 119

E – Johnson Surrebuttal, p. 14

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

E – Denney Direct, pp. 159, 167, 169-170, 174 **Q – Albersheim Direct, p. 55**

E – Denney Surrebuttal, p. 113

E – Johnson Surrebuttal, p. 14

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

E – Denney Direct, pp. 159, 168-169, 171, 176 **Q – Albersheim Direct, p. 47**

E – Denney Surrebuttal, p. 113

E – Johnson Surrebuttal, p. 14

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

E – Denney Direct, pp. 159, 168-169, 171, 178 **Q – Albersheim Direct, p. 47**

E – Denney Surrebuttal, p. 115

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

E – Denney Direct, pp. 159, 168-169, 171, 178 **Q – Albersheim Direct, p. 47**

E – Johnson Surrebuttal, p. 14

Issue 12-67 (f): Expedited Orders – Trunk orders (2 Options) -- Section 7.3.5.2 and subparts

E – Denney Direct, pp. 159, 168-169, 171, 178 **Q – Albersheim Direct, p. 47**

E – Johnson Surrebuttal, p. 14

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

E – Denney Direct, pp. 159
E – Denney Surrebuttal, p. 113
E – Johnson Surrebuttal, p. 14

Q – Albersheim Direct, p. 55

31A. INTENTIONALLY LEFT BLANK (FORMERLY SUPPLEMENTAL ORDERS – ISSUE 12-68)

32. INTENTIONALLY LEFT BLANK (FORMERLY PENDING SERVICE ORDER NOTIFICATIONS (PSOs) - ISSUE 12-70)

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

Issue 12-71 – Jeopardy -- Section 12.2.7.2.4.4

E – Johnson Direct, pp. 37, 60, 64-65, 67-68, 72, 96
E – Johnson Rebuttal, p. 16
E – Johnson Surrebuttal, p. 29-30
Q – Albersheim Direct, p. 55
Q – Albersheim Rebuttal, pp. 5, 50, 62
Q – Albersheim Surrebuttal, p. 1, 7, 20, 29

Issue 12-72: Jeopardy Classification -- Section 12.2.7.2.4.4.1

E – Johnson Direct, pp. 60, 65, 68-71, 92, 96
E – Johnson Rebuttal, pp. 8, 16, 19, 23-24
E – Johnson Surrebuttal, p. 29-30
Q – Albersheim Direct, p. 55
Q – Albersheim Rebuttal, pp. 50, 62
Q – Albersheim Surrebuttal, pp. 1, 20, 29, 34, 70, 71

Issue 12-73: Jeopardy Correction -- Section 12.2.7.2.4.4.2

E – Johnson Direct, pp. 37, 60, 64-65, 67-68, 72, 96
E – Johnson Rebuttal, p. 16
E – Johnson Surrebuttal, p. 29-30
Q – Albersheim Direct, p. 55
Q – Albersheim Rebuttal, pp. 5, 50, 62
Q – Albersheim Surrebuttal, p. 1, 20, 29

SUBJECT MATERS NO. 34 THROUGH NO. 42 ARE NOW INTENTIONALLY LEFT BLANK

(FORMERLY 34. FATAL REJECTION NOTICES – ISSUE 12-74)(FORMERLY 35. TAG AT DEMARCATION POINT – ISSUE 12-75 and (a))(FORMERLY 36. LOSS AND COMPLETION REPORTS - ISSUE 12-76 and (a))FORMERLY 37. TESTING CHARGES WHEN CIRCUIT IS ON PAIR GAIN – ISSUE 12-77)(FORMERLY 38. DEFINITION OF TROUBLE REPORT – ISSUE 12-78)(FORMERLY 39. CHARGES FOR REPEATS – ISSUE 12-80 and (a)-(c))(FORMERLY 40. TEST PARAMETERS – ISSUE 12-81)(FORMERLY 41. INTENTIONALLY LEFT BLANK)(FORMERLY 42. TROUBLE REPORT CLOSURE – ISSUE 12-86)

43. CONTROLLED PRODUCTION – ISSUE 12-87

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

E – Johnson Direct, pp. 41, 96, 99-100, 103-104, 109, 111	Q – Albersheim Direct, p. 58
E – Johnson Rebuttal, pp. 32-34, 40-41	Q – Albersheim Rebuttal, p. 67-68
E – Johnson Surrebuttal, p. 79, 81	Q – Albersheim Surrebuttal, p. 1, 32

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

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

E – Denney Direct, pp. 199-202, 211	Q – Easton Direct, pp. 2, 34
E – Denney Rebuttal, p. 127	Q – Easton Rebuttal, p. 32
E – Denney Surrebuttal, p. 137-138	Q – Easton Surrebuttal, p. 25

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

E – Denney Direct, pp. 199-201, 206, 211	Q – Easton Direct, pp. 2, 35
E – Denney Rebuttal, pp. 127, 129	Q – Easton Rebuttal, pp. 32-33
E – Denney Surrebuttal, p. 137-138, 140	Q – Easton Surrebuttal, p. 25

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

E – Denney Direct, pp. 199-201, 209-211	Q – Easton Direct, pp. 2, 36
E – Denney Rebuttal, pp. 127-128, 130, 135, 137, 144	Q – Easton Rebuttal, pp. 32-34
E – Denney Surrebuttal, p. 137-138, 141	

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

Issue 22-90: Unapproved Rates - Notice and Cost Support -- Sections 22.6.1 and 22.6.1.1

E – Denney Direct, pp. 29-32, 34, 209, 211-212, 216-222, 225, 228-229, 231-233, 235, 237 (All Issues)	Q – Easton Direct, pp. 2, 36-37
E – Denney Rebuttal, pp. 131-132, 134-138, 140 (All Issues)	Q – Easton Rebuttal, p. 34
E – Denney Surrebuttal, p. 142, 144, 148-149, 151, 157, 162, 166	Q – Easton Surrebuttal, p. 27 (All Issues)

Issue 22-90(a) Unapproved Rates – Cross reference – Exhibit A - Section 22.4.1.1

Issue 22-90(b) Collocation – Planning and Engineering – Exhibit A - Section 8.1.1.2
Q – Million Surrebuttal – p. 26 (for (b) through (e))

46. INTENTIONALLY LEFT BLANK (FORMERLY INTERCONNECTION ENTRANCE FACILITY³ - ISSUE 24-92)

E – Denney Direct, p. 238

Q – Stewart Direct, p. 2

➤ *Exhibit A – See Issue 22-90(a) through (a) above*

³ Issue 24-91 (Section 24.1.1.2) is closed. The number is now Intentionally Left Blank.