

Qwest

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**Alex M. Duarte**

Corporate Counsel- Oregon and Utah

December 15, 2008

Ms. Julie Orchard
Utah Public Service Commission
Heber M. Wells Building
160 East 300 South, 4* Floor
Salt Lake City, Utah 84111

Re: Docket 08-049-50- Qwest letter re agreed-upon EDI/XML changes

Dear Ms. Orchard:

This letter provides a description of the changes relative to “EDI/XML” (Electronic Data Interchange/Extensible Mark-up Language) that Qwest agreed to make during the technical conference held on December 3, 2008 pursuant to the Commission’s procedural order in this docket. During the technical conference, Qwest further agreed to make a filing representing that it has agreed to Integra’s request to make the EDI/XML changes. Qwest described the changes as being the same, in principle, to those it agreed to make as part of similar proceedings in Washington and Colorado. Accordingly, Qwest notes that the description provided in the Colorado Public Utilities Commission Staff’s Second-Year Report (associated with the second annual review of the Colorado PAP (CPAP), May 2008) is most descriptive of these changes and forms the basis for the descriptions provided in this letter.

The agreed-upon EDI/XML changes consist of updating the PID to address the retirement of the Electronic Data Interchange (EDI) interface and its replacement with the Extensible Mark-up Language (XML) interface and making such other related PID and PAP changes as were agreed upon in the Colorado 2007 Annual PAP review, as applicable to Utah. Overall, the telecommunications industry had moved from EDI as a set of standards for computer-to-computer intercommunication and has instead begun to use XML. Since certain PIDs measured or referenced EDI, the agreed-upon changes consist of replacing references to the EDI interface with references to XML or replacing measurements or sub-measurements that exclusively addressed EDI with measurements that address XML.

Specifically, the changes include the following:

- Add language to appropriate PIDs to provide for a “stabilization period” following implementation of EDI/XML-related changes in new or modified measurements. That language is as follows:

“Stabilization Period: For each of these new measures/sub-measures that include XML results there will be a 3-month measurement stabilization period. During this period, no payment applies if the payment is determined to have been caused by the development to include XML into the PID results and not due to an actual performance miss. In order to determine the cause of payments during the stabilization period, if any payments are identified, the payment’s due date will be extended for 30 days to provide Qwest the opportunity to perform root cause analysis and make the results readily available to the impacted parties. Until performance reporting includes XML results, the prior measures/sub-measures included in the PAP will apply. Further, should either the IMA-GUI or IMA-XML interfaces be replaced in the future, results from the replacement interfaces will be automatically incorporated into these measures and be included in the PAP (with a stabilization period) coincident with CLEC migration to the new interfaces subject to changes to the impacted measures including but not limited to modification due to operational differences with the replacement interfaces.”

- The GA-2 (Gateway Availability) was replaced by GA-8, that measures availability of IMA-XML and applies the same standard from GA-2 (subject to a stabilization period described above).
- GA-7 (Timely Outage Resolution following Software Releases) and PO-16 (Timely Release Notifications): replace IMA-EDI with IMA-XML in the description.
- PO-1 (Pre-Order Response Time):
 - ◆ Replace sub-measurement PO-1B with a new sub-measurement to capture IMA-XML using existing transactions, response targets, and standards.
 - ◆ Remove sub-measurements PO-1C and PO-1D.
- PO-2 (Electronic Flow-through): Remove interface-specific sub-measurements and create a new sub-measurement to capture both IMA-GUI and IMA-XML results combined, noting that PO-2B is included in the Reinstatement/Removal process, using existing standards in combination with that process.
- PO-3 (LSR Rejection Notice Intervals) and PO-7 (Billing Completion Notice Timeliness): Remove existing interface-specific sub-measurements and create new sub-measurements to capture IMA-GUI and IMA-XML results combined, for each of these two measurements, noting that PO-3 and PO-7 are included in the Reinstatement/Removal process, using existing standards in combination with that process. Remove PO-3B entirely.
- PO-5 (FOC Timeliness) and PO-6 (Work Completion Notice Timeliness): Remove existing interface-specific sub-measurements and create new sub-measurements to capture IMA-GUI and IMA-XML results combined, for each of these two measurements, using existing PID details. For PO-6, update PID language to reflect that all notices will be measured to the point in the notification process where they are made available to the interface, for both IMA-GUI and IMA-XML.

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- PO-19 (SATE Accuracy): Qwest will continue to report PO-19 SATE results for XML with the elimination of mid-release testing, changing PID language to apply to XML instead of EDI.
- PO-20 (Manual Service Order Accuracy): Replace IMA-EDI with IMA-XML in the Description.
- Updates to PAP Section 7.4 and Attachment 1 to reflect the inclusion of the stabilization period language and to update references to measure/sub-measure numbering.

Qwest will implement these changes at the next practicable opportunity in its measurement systems following the effective date of the Commission's order in this docket.

If the Commission has any questions about this letter, or the subject of this letter, please feel free to contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Alex M. Duarte', written in a cursive style.

Alex M. Duarte
Qwest, Corporate Counsel- Utah
Attorney for Qwest Corporation