

Attachment N: Failure to Assign the Best Available Loop

I. QWEST NOT ASSIGNING THE BEST AVAILABLE LOOP – ASSIGNING TO VOICE PARAMENTERS FOR CLECs	
Description of Events	Description of Qwest’s Response
<p>On 10/19/09, Integra submitted Local Service Request (LSR) PON: BS-2334098-HDSL requesting a 2-Wire Non-Loaded (NC Code – LX-N) HDSL (NCI code: 02QB9.00H) Loop. Integra authorized the charges to condition the loop.</p>	<p>Qwest delivered Circuit ID 3.LXFU.562922..NW with 110 feet of Bridge Tap.¹ Bridge Tap is known to have a potential negative impact on DSL signals. Qwest’s Raw Loop Data – Unassigned by Address indicates that there are at least two loops available without Bridge Tap at this end user customer’s service address. The CLEC is unable to reserve or select the loop that would best meet the technical parameters. Qwest has sole control over the assignment process, and the Qwest assignment process did not select the best loop.</p>

¹ The Bridge Tap on the circuit in this example is not currently interfering with the HDSL service. If Qwest later makes a network change that results in the Bridge Tap causing interference, however, Qwest should remove the Bridge Tap. Its current policy, however, is to refuse to do so. Qwest claims Qwest has *no obligation to repair* it to the standard that HDSL will continue to work.” Qwest attorney Daphne Butler, 4/1/09 letter to Integra (emphasis added). See Attachment C(23), p. 107 & Attachment A, Row No. 5.

Excerpts from Local Service Request (LSR) PON BS-2334098-HDSL, which confirms Integra requested conditioning (SCA = Y) and confirms Integra ordered a 2-Wire Non-Loaded HDSL compatible loop.

Order Information

PON: **BS-2334098-HDSL** VER: **1**
REQTYP: **A - Unbundled Loop** B - Firm Order
Activity: **N - New Installation and/or Account**
TOS: **1 - Business**

Admin

PG_of_ D/T SENT
200910191650
DSPTCH DDD APPTIME APTCON DDDO DFDT
2009/10/23

PROJECT CHC TEST
N - No Testing

REQTYPE ACT RSTTYP CIP CSO1: CSO2: PMI
AB N

CONVIND MI SUP EXP RTR
D - Confirmation of LSR & DLR

CC AENG ALBR SCA
7482 Y - Yes

AGAUTH DATED AUTHNM
Y - Authorization **2009/09/30** **[Customer Identifying information Redacted]**

PORTTYP: ACTL: AI APOT: LST: LSO: TOS: NPDI: SPEC:
651452 1

NC: NCI: SECNCI: RPON: RORD: DLQTY:
LX- 02QB9.00H 02DU9.00H 0

Excerpts from the Qwest Completion Notice for PON BS-2334098-HDSL which confirms Qwest delivered 2 Wire Non-Loaded loop on Circuit ID 5.LXFU.562922..NW.

Service Order Processor Completion Notice

Service Order Processor Completion Notice Sent: 10/21/2009 14:39, MDT

Completion Notice for LSR_ID: 29444411

Administration Section
#####

CCNA	CC--	PON-----	VER	LSR-NO	C/TSENT-----
003	7482	BS-2334098-HDSL	1		10/21/2009 02:39:41 PM

Order Information Section
#####

ORDER-REF-NUM	ORD-----	CD-----	AN-----
1	N49853634	10/21/2009	651 W30-2301-634

S&E Section:

ACTION USOC/FID

ICKI A1/CLS 3.LXFU.562922..NW
/CKR HDSL2.[Customer Identifying Information Redacted]

OICE.1

ICKL 1-.[Customer Identifying Information Redacted]
/CFA .[Customer Identifying Information Redacted]
/TAR MN1909

ILCON NR, 000 000-0000
I1 TYLCQ/NC LX-N/NCI 02QB9.00H/ZCID 003

ICKL 2-.[Customer Identifying Information Redacted] /LSO
651 452/TAR MN1909
/SN .[Customer Identifying Information Redacted]

ILCON .[Customer Identifying Information Redacted]
I1 U23WX/NC LX-N/NCI 02DU9.00H/CNC 1CRUL/ZCID 003/RTZ 4
I1 1CRUL/ZCID 003
I1 VT6TU/ZCID 003
I1 URCTC/ZCID 003
I1 URCTD/ZCID 003

Excerpts from the Qwest Interconnect Mediated Access (IMA) Pre-Order Raw Loop Data Assigned by Address which confirms that Qwest assigned and delivered 3.LXFU.562922..NW (2-Wire non-loaded loop) on facility, with a Bridge Tap.

Begin (22 of 22) -- Raw Loop Data Query By Assigned Address

WTN:

[REDACTED]

CIRCUIT ID (ECCKT) :

3.LXFU.562922..NW CKL 2

TPRDI :

[REDACTED]

Loop
Status:

WKG

Begin (1 of 2) -- Raw Loop Data Query By Assigned Address

TERMINAL ID:

X 2990 LONE OAK CIR

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
25	NO_PG	303		0

BRIDGE TAP OFFSET:

4 1.771

MAKE UP DESC:

24AWG 1.781kf 26AWG
0.025kf 24AWG 0.490kf

26BT 0.110kf

End (1 of 2) -- Raw Loop Data Query By Assigned Address

Begin (2 of 2) -- Raw Loop Data Query By Assigned Address

TERMINAL ID:

I.[Customer Identifying Information Redacted]

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
2990L	NO_PG	2492		0

BRIDGE TAP OFFSET:

MAKE UP DESC:

24AWG 2.020kf 26AWG
0.980kf 24AWG 0.720kf

Excerpts from the IMA Pre-Order Raw Loop Data Un-assigned by Address which confirms that there were at least two loops without Bridge Tap at the end user customer's location. This also confirms that CLECs are unable to reserve or select the best available facility.

Raw Loop Data Query By UnAssigned Address

Query by Address

This query will NOT reserve these facilities. This is a query

Begin (4 of 20) -- Raw Loop Data Query By UnAssigned Address

WTN:

[REDACTED]

CIRCUIT ID (ECCKT) :

[REDACTED]

TPRDI : Loop
Status:
[REDACTED] **CNF**

Begin (1 of 2) -- Raw Loop Data Query By UnAssigned Address

TERMINAL ID:

X 2990 LONE OAK CIR

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
5	NO_PG	563		0

BRIDGE TAP OFFSET:

MAKE UP DESC:

22AWG 1.517kf 24AWG
0.510kf

End (1 of 2) -- Raw Loop Data Query By UnAssigned Address

Begin (2 of 2) -- Raw Loop Data Query By UnAssigned Address

TERMINAL ID:

I.[Customer Identifying Information Redacted]

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
2990L	NO_PG	2457		0

BRIDGE TAP OFFSET:

MAKE UP DESC:

24AWG 2.020kf 26AWG
0.980kf 24AWG 0.720kf

End (2 of 2) -- Raw Loop Data Query By UnAssigned Address

Begin (7 of 20) -- Raw Loop Data Query By UnAssigned Address

WTN:

[REDACTED]

CIRCUIT ID (ECCKT) :

[REDACTED]

TPRDI : Loop
Status:
[REDACTED] **CNF**

Begin (1 of 2) -- Raw Loop Data Query By UnAssigned Address

TERMINAL ID:

X 2990 LONE OAK CIR

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
25	NO_PG	277		0

BRIDGE TAP OFFSET:

MAKE UP DESC:

24AWG 1.781kf 26AWG
0.025kf 24AWG 0.490kf

End (1 of 2) -- Raw Loop Data Query By UnAssigned Address

Begin (2 of 2) -- Raw Loop Data Query By UnAssigned Address

TERMINAL ID:

**I.[Customer Identifying Information
Redacted]**

CABLE NAME:	PAIR GAIN TYPE:	PAIR NUMBER:	LCT:	LOAD POINTS AMOUNT:
2990L	NO_PG	2419		0

BRIDGE TAP OFFSET:

MAKE UP DESC:

24AWG 2.020kf 26AWG
0.980kf 24AWG 0.720kf